Regional Consolidated Housing and Community Development Plan

July 1, 2021 - June 30, 2026

City of Grand Rapids and Kent County





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Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

Introduction

The City of Grand Rapids and Kent County have collaborated to develop a Regional Consolidated Housing and Community Development Plan for federal fiscal year (FFY) 2021 – 2025 (July 1, 2021 through June 30, 2026). This five-year plan, referred to as a "Consolidated Plan," will guide each jurisdiction's investment of funds received through the U.S. Department of Housing and Urban Development (HUD) to address the needs outlined in this document.

The Consolidated Plan guides investment of funds from the following programs:

Community Development Block Grant Program (CDBG) - Provides funds annually to address community and neighborhood needs such as housing, infrastructure, parks and open space, and programs designed to improve the lives of Kent County and Grand Rapids residents.

HOME Investment Partnerships Program (HOME) – Provides funding specifically targeted to address housing needs. Funds can be used to develop new housing opportunities, renovate existing structures, provide rental assistance, and increase homeownership through first-time homebuyer incentives.

Emergency Solutions Grants Program (ESG) – Provides funding specifically targeted to reducing homelessness within the community and addressing the needs of those individuals currently experiencing homelessness.

Formula Program	Grand Rapids	Kent County*
Community Development Block Grant Program (CDBG)	\boxtimes	\boxtimes
HOME Investment Partnerships Program (HOME)	\boxtimes	\boxtimes
Emergency Solutions Grants Program (ESG)	\boxtimes	\boxtimes

Table 1: Formula Grant Programs

*Kent County is the administrative lead for a Kent County/City of Wyoming HOME Consortium.

The Consolidated Plan consists of the following sections:

- 1. **Process**: Describes the community engagement and consultative processes used to identify the needs and priorities outlined in this plan.
- 2. **Needs Assessment**: Analyzes the needs of the communities related to affordable housing, homelessness, and other community development needs.
- 3. **Market Analysis**: Examines the demographics of the community, and current supply and future needs of affordable housing based on anticipated growth or other community factors that could impact household composition.
- 4. **Strategic Plan**: Identifies the goals, strategies and intended outcomes to address the needs and priorities identified through the planning process.

The Plan will also include the first year (2021) Annual Action Plan for each jurisdiction, which will describe the planned investment of federal resources to implement specific activities that meet the year's strategic goals.

Kent County and the City of Grand Rapids engaged in a coordinated planning process that recognizes the region shares needs, resources and markets that do not stop at jurisdictional borders. While the jurisdictions engaged in this greater coordination among neighboring communities, each jurisdiction is responsible for allocating its own resources based on local priorities.

<u>Data</u>

The Consolidated Plan was developed using quantitative and qualitative data from many sources. The primary quantitative data sources include the 2013-2017 Comprehensive Affordability Strategy (CHAS), the 2013 – 2017 American Community Survey (ACS), and the ESRI Business Analyst. Other local and national data is used as indicated in this plan. The qualitative data is derived from the community engagement process which included focus groups, individual consultations, and resident surveys.

Plans Consulted

A number of plans and resources were consulted during the development of the Consolidated Plan. A full listing of the plans consulted is outlined in the next section. Key plans that were reviewed and consulted include:

- Bowen National Research Grand Rapids/Kent County 2020 Housing Needs Assessment
- City of Grand Rapids Strategic Plan FY 2020 2023
- City of Grand Rapids Master Plan (2002)
- City of Grand Rapids Parks and Recreation Strategic Master Plan (2017)
- Housing Next Housing Needs and Opportunities (2020)
- Grand Rapids Equitable Economic Development and Mobility Strategic Plan (2020)
- Great Housing Strategies: Addressing Current and Future Housing Needs in Grand Rapids (2015)
- Housing NOW! Data Compendium for Informed Housing Policy (2018)
- Livability for All in the City of Grand Rapids, MI: An Age-Friendly Community Survey of Residents Age 50-Plus (2016)
- Assessment of the Vision to End Homelessness (2015)
- Kent County Community Action Community Needs Assessment (2019)
- Kent County Community Action 2019 Annual Report
- KConnect "Redefining the Path Home: System Building for Housing Stability in Kent County" (2020)

Needs and Market Analysis Summary

Kent County and Grand Rapids saw an increase in population and total households over the past five years, and those trends are expected to continue over the next five years. Unfortunately, the rate of housing construction has not kept pace with the additional number of households resulting in a tight housing market that has seen an escalation in rent and home purchase prices. In many cases, these increased housing costs have outpaced the rise in incomes, leading many households to pay more than 30% of their income toward housing costs, which HUD considers the threshold for "housing cost burden." The high cost and limited supply of housing was the leading concern expressed by stakeholders during the public engagement process. Improving housing affordability, accessibility and

quality for <u>all</u> residents were high priorities identified during the consultation process. It is important to note that Black and Hispanic residents have disproportionate housing problems across most income cohorts.

Key findings from this analysis and the 2020 Bowen National Research Housing Needs Assessment are:

- 1) Population and household growth rates in Kent County have been positive since 2010 and are projected to remain positive through 2025.
- 2) An increase in senior households (age 65 and older) is projected in Kent County and Grand Rapids.
- 3) More than 2,000 housing units in the region are considered "substandard."
- 4) Many households in Kent County and Grand Rapids are "cost burdened" (paying over 30% of their income toward housing cost).
- There is limited available housing inventory serving very low- and low-income renter households, likely contributing to the large number living in substandard and/or cost burdened housing.
- 6) There is limited supply of for-sale housing available for purchase in the county, and much is not affordable to low-income households.

Housing Gap Estimates:

The 2020 Bowen National Research Housing Needs Assessment determined a rental housing gap over the next few years of 8,921 units, and a for-sale housing gap of 13,308 units within Kent County (PSA and SSA combined from Tables 2 and 3).

		Rental Housing	g Gap Estimat	tes (2020-2025)
Income Level (AMHI)	0-30%	31%-50%	51%-80%	81%-120%	121%+
Low (Income)	\$0	\$24,001	\$40,001	\$64,001	\$96,001+
High (Income)	\$24,000	\$40,000	\$64,000	\$96,000	Unlimited
Affordability Level	0-30%	31%-50%	51%-80%	81%-120%	121%+
Low (Rent)	\$0	\$601	\$1,001	\$1,601	\$2,401
High (Rent)	\$600	\$1,000	\$1,600	\$2,400	Unlimited
PSA (Grand Rapids)	1,031	895	966	1,469	979
SSA (Kent County less Grand Rapids)	266	938	924	1,001	452
DSA (Downtown Grand Rapids)	656	360	391	476	416

Table 2: Rental Housing Gap

Source: 2020 Bowen National Research Housing Needs Assessment

	For-Sale Housing Gap Estimates (2020-2025)				
Income Level (AMHI)	0-30%	31%-50%	51%-80%	81%-120%	121%+
Low (Income)	\$0	\$24,001	\$40,001	\$64,001	\$96,001+
High (Income)	\$24,000	\$40,000	\$64,000	\$96,000	Unlimited
Affordability Level	0-30%	31%-50%	51%-80%	81%-120%	121%+
Low (Price)	\$0	\$90,001	\$150,001	\$240,001	\$360,001
High (Price)	\$90,000	\$150,000	\$240,000	\$360,000	Unlimited
PSA (Grand Rapids)	254	346	949	1,569	430
SSA (Kent County less Grand Rapids)	-	1,793	1,608	3,870	2,489
DSA (Downtown Grand Rapids)	-	143	208	162	100

Table 3: For-Sale Housing Gap

Source: 2020 Bowen National Research Housing Needs Assessment

Racial Equity

Both qualitative and quantitative data analyzed in this plan evidence systems of institutional injustice. Housing segregation by race and income is apparent throughout the region and perpetuates inequitable access to a variety of opportunities. In *A City Within A City: The Black Freedom Struggle in Grand Rapids, Michigan,* Todd E. Robinson demonstrates:

As late as the mid-1950s, Blacks and Whites lived in a number of interracial neighborhoods in Grand Rapids. During the postwar housing boom, however, White residents capitalized on a suburban growth market that excluded Blacks. [...] Pervasive racism in the Grand Rapids housing market helped confine the majority of the Black population to homes in one section of the city. As a result, the core Black residential area continued to grow larger and more concentrated. Bolstered by the Federal Housing Administration's (FHA's) racially restrictive practices, local builders, real estate brokers, bankers, and white homeowners ensured the majority of Blacks had minimal access to homes outside the developing "black belt" near the center of the city. As business reformers and progressive reformers concentrated on bettering city services, building suburbs, and developing the downtown area, the growing Black community neighborhood needs went left unattended (pg. 51).

In addition to bolstering patterns of racially segregated neighborhoods, national, state, and local policies prevented black Americans from accessing the same homeownership opportunities provided to white Americans in the post-World War II era. Housing segregation and disparity in homeownership rates are inextricably linked to inequitable outcomes related to housing stability, homelessness, transportation, education, employment, health, income, and wealth. In *The Color of Law*, Richard Rothstein explains, the equity families have in their homes is "the main source of wealth for middle-class Americans" and that, due to housing discrimination and segregation, "White families are more often able to borrow from their home equity, if necessary, to weather medical emergencies, send their children to college, retire without becoming dependent on those children, aid family members experiencing hard times, or endure brief periods of joblessness without fear of losing a home or going hungry" (pg. 185).

Both the City of Grand Rapids and Kent County are committed to taking intentional steps to dismantle the systemic and institutional injustices prevalent throughout our history. The needs identified in this plan, and the strategies to address them, are rooted in an awareness that local government is uniquely positioned to reduce disparities through policy, practice, transparency, and accountability.

Evaluation of past performance

Kent County and the City of Grand Rapids each administer the HUD funded programs and activities through their respective Community Development offices. Both jurisdictions have made significant progress in meeting their previous five-year goals. Detailed progress evaluations are annually reported through the Consolidated Annual Performance and Evaluation Report (CAPER), which are posted on each jurisdiction's website.

Summary of Citizen Participation Process and Consultation Process

Public Input on Housing and Community Development Needs

Public input on housing and community development needs to inform development of the FFY 2021 – 2025 Regional Consolidated Plan was gathered through multiple means. Due to the COVID-19 pandemic, non-traditional outreach and planning meetings were required instead of in-person discussions.

- Nine (9) different focus groups were held from September 15, 2020 through September 18, 2020. Regional focus group topics included: equity and inclusion, affordable housing and fair housing needs and priorities, economic development needs and priorities, and homeless and special needs housing priorities. Jurisdiction-specific focus groups included Grand Rapids neighborhood leadership and Kent County cities, villages, and townships. Approximately 115 individuals participated in these focus groups.
- An online Community Needs and Priorities Survey was distributed through various means including direct email, posting on agency social media accounts and paid advertising through Facebook. The online survey was available from September 30, 2020 through November 13, 2020. The survey resulted in 390 responses which are summarized in Appendix D.
- The public was invited to attend a series of online public forums that took place October 7, 2020 through October 15, 2020. The forums were held in the evenings to accommodate as many working residents as possible. Four (4) forums were targeted to Kent County residents (two in English and two in Spanish), and six forums were targeted to Grand Rapids residents (three in English and three in Spanish). There were four (4) attendees.

Public Hearing and Comment Period on Draft HCD Plan

The City of Grand Rapids and Kent County held a joint 30-day public comment period on the full draft FFY 2021 – FFY 2025 Housing and Community Development Plan from January 4, 2021 – February 2, 2021. Each jurisdiction held a separate public hearing for citizen input. A hearing was held before Kent County Community Action staff on January 21, 2021 and the Grand Rapids City Commission on January 26, 2021. In addition to public notices in the *Grand Rapids Press, The Grand Rapids Times,* and *El Vocero Hispano,* an email invitation for comment was extended to all current subrecipients/contractors and to other partners identified in the Institutional Structure section of this Plan. The draft Plan was available for review on the City of Grand Rapids and Kent County web sites.

Summary of the objectives and outcomes

The following goals were identified to address the needs and priorities determined through the community engagement process. Each jurisdiction within the regional consolidated plan will tailor individual activities in a manner that best fits their community while achieving one or more of the regional goals.

Outcome 1: Prevent and resolve episodes of homelessness. Support efforts to obtain or retain housing stability for individuals and families experiencing homelessness or at risk of homelessness. Activities include, but are not limited to, homelessness prevention and rapid re-housing.

Outcome 2: Improve access to and stability of affordable housing. Increase household stability and equitable access to housing. Activities include, but are not limited to, fair housing education and enforcement, housing-related legal assistance, down payment assistance, foreclosure intervention, and tenant-based rental assistance.

Outcome 3: Increase the supply of affordable housing. Increase the number of newly constructed and rehabilitated affordable rental and homeownership units available to low- and moderate-income households. Activities include, but are not limited to, infill new construction; conversion of vacant non-residential buildings to rental housing; rehabilitation and sale of single-family homes for first-time homebuyers; and development of permanent supportive housing for persons with disabilities, the chronically homeless, or other underserved populations.

Outcome 4: Improve the condition of existing housing. Support the maintenance, repair, and improvement of existing housing. Activities include, but are not limited to, housing rehabilitation, emergency and minor repairs, access modifications, lead-based paint remediation, code enforcement, and weatherization and energy efficiency improvements.

Outcome 5: Foster engaged, connected and resilient neighborhoods. Support actions that build relationships, lift resident voice, and enhance neighborhood stability. Activities include, but are not limited to, community organizing, education and referral services, and promote equitable development.

Outcome 6: Improve community safety. Support efforts that enhance resident safety and quality of life in neighborhoods. Activities include, but are not limited to, crime prevention education and organizing, violence reduction strategies, and other services to ensure health and safety.

Outcome 7: Improve economic opportunity. Support equitable economic prosperity with an emphasis on improving financial and social capital. Activities include, but are not limited to, job readiness, skill development, training, and technical assistance for existing and new microenterprises, and supporting dedicated facilities and services for small business and entrepreneurial opportunities.

Outcome 8: Enhance neighborhood infrastructure. Improve physical infrastructure and create a sense of place in neighborhoods and neighborhood business corridors. Projects include, but are not limited to, parks and open space, streets and streetscapes, sidewalks, tree planting, and façade improvements.

Summary of public comments

A total of seventeen (17) comments, eleven (11) written and six (6) verbal, were received on the FFY 2021 – 2025 Consolidated Plan.

Verbal Comments

- One individual commented on the need to address renewable energy.
- One individual recommended prioritization of contracts for non-profit developers and focus on sustainability with particular attention to environmental health.
- One organization provided two comments (one at each public hearing) expressing appreciation for support of fair housing services.
- Two organizations asked questions about income qualifications, and Kent County's funding application process.

Written Comments

- Ten (10) individuals offered a number of comments and recommendations on a variety of topics including, but not limited to, prioritization of affordable rental housing, equity, energy efficiency, geographic targeting, housing development monitoring and oversight, and landlord engagement.
- One (1) organization commented that the Plan is well done, provides some great data, and will be helpful for preparing future grant applications.

Summary of comments or views not accepted and the reasons for not accepting them

• Some comments received identified specific circumstances related to an individual's current housing situation, property conditions, or difficulty with a landlord. These issues are covered in broader context within the plan related to housing affordability, code enforcement, etc. Individual concerns were addressed separately, as feasible, by Grand Rapids City staff.

The Process

Introduction

The plan was developed through the coordination and collaboration of the Community Development Departments of Kent County and the City of Grand Rapids. This section describes the process used to develop the Consolidated Plan.

PR - 05 Lead & Responsible Agencies 24 CFR 91.200(b)

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source. The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Grant Program	Grantee	Agency
CDBG Administrator	Grand Rapids	Community Development Department
HOME Administrator	Grand Rapids	Community Development Department
ESG Administrator	Grand Rapids	Community Development Department
CDBG Administrator	Kent County	Kent County Community Action
HOME Consortium	Kent County and City of Wyoming Consortium	Kent County Community Action
ESG Administrator	Kent County	Kent County Community Action

Table 4: Responsible Agencies

Consolidated Plan Public Contact Information

Table 5: Public Contact Information	
City of Grand Rapids	Kent County
Ms. Connie M. Bohatch	Ms. Susan Cervantes
Managing Director of Community Services	Director
Community Development Department	Kent County Community Action
cbohatch@grcity.us	Susan.Cervantes@kentcountymi.gov
300 Monroe Avenue NW, Suite 460	121 Franklin Street SE, Suite 110
(616) 456-3677	(616) 632-7950

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

<u>Provide a concise summary of the jurisdiction's activities to enhance coordination between</u> <u>public and assisted housing providers and private and governmental health, mental health, and</u> <u>service agencies (91.215(I)).</u>

Although each jurisdiction, through its Community Development Department, assumes overall responsibility for administering Consolidated Plan programs, many funded activities are carried out or otherwise supported by other city or county departments, developers, and sub-recipient organizations. These partner organizations and stakeholders bring expertise and on-the-ground perspectives that play a critical role in identifying priority community development needs and strategies that comprise the Consolidated Plan.

A broad outreach campaign was undertaken to provide opportunities for residents, community organizations, and neighborhood and civic leaders to provide input into the development of the Consolidated Plan. During the development of this plan, COVID-19 restrictions required all public engagement efforts to be undertaken online. Those efforts included public meetings, focus groups, individual interviews, and online surveys. All surveys and documents were available in English and Spanish, and the public planning meetings were facilitated in English and Spanish.

Efforts were made to publicize the meetings and events through targeted email lists, social media platforms, direct outreach to agency contacts, and direct outreach to community and neighborhood leaders. Additionally, paid advertising through Facebook was undertaken to attempt to reach additional stakeholders in the Kent County region. The Facebook ads were seen by over 32,000 individuals. Through the development of this plan approximately 500 stakeholders provided input into the development of the needs, goals, and priorities.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Each jurisdiction is a member and active participant of the Continuum of Care (Grand Rapids Area Coalition to End Homelessness) and works diligently to ensure efforts are coordinated in a manner that positively impacts the service delivery to homeless persons and those at risk of homelessness. City and County staff are members of the CoC Steering Committee which is tasked with the overall coordination of homeless prevention services.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies, and procedures for the administration of HMIS.

The City and County are active participants of the CoC and the CoC Steering Committee, which oversees all aspects of the Continuum including funding policies and procedures, and HMIS administration. The staff ensure regular consultation occurs and ESG funding is aligned with the goals, policies, and programs of the CoC.

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities.

Over 70 agencies and organizations were consulted during the development of the consolidated plan. The full list is in Appendix A.

Identify any Agency Types not consulted and provide rationale for not consulting.

Efforts were made to consult with every relevant organization and no organizations were intentionally excluded.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
City of Grand Rapids Master Plan (2002)	City of Grand Rapids Planning Department	The themes of the Master Plan: Great Neighborhoods, Vital Business Districts, A Strong Economy, Balanced Transportation, A City That Enriches Our Lives, A City in Balance with Nature are aligned with the Strategic Plan.
City of Grand Rapids Parks and Recreation Strategic Master Plan (2017)	City of Grand Rapids Parks and Recreation Department	The goals of this plan include: Creating a connected network of parks, natural areas, and waterways accessible to the entire Grand Rapids community; and creating programs and projects that support the physical, mental and emotional well-being of community members.
Bowen National Research Grand Rapids/Kent County 2020 Housing Needs Assessment	City of Grand Rapids	The goals of this plan align with the Strategic Plan goals of improving the quality, affordability, and accessibility of housing within the region.
City of Grand Rapids Strategic Plan FY 2020 - 2023	City of Grand Rapids	This plan outlines the strategic priorities of the City including economic prosperity and affordability, engaged and connected residents, health and environment, mobility, safety, and equity.
Grand Rapids Equitable Economic Development and Mobility Strategic Plan (2020)	City of Grand Rapids Economic Development Department	This plan outlines ways to ensure low income, high unemployment areas profit from the economic growth of the City and increase access to opportunities for all residents of Grand Rapids.
Housing NOW! Data Compendium for Informed Housing Policy (2018)	City of Grand Rapids	This planning initiative is aimed at increasing the supply of affordable housing and increasing homeownership opportunities in Grand Rapids.
Great Housing Strategies: Addressing Current and Future Housing Needs in Grand Rapids (2015)	City of Grand Rapids	This plan is a beginning framework for advancing policies, practices, and partnerships that contribute to a prosperous and equitable approach in meeting current and future housing needs in Grand Rapids.

Table 6: Local, Regional, and Federal Planning Efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Livability for All in the City of Grand Rapids, MI: An Age- Friendly Community Survey of Residents Age 50-Plus (2016)	City of Grand Rapids Planning Department	This initiative focuses on improvements in eight areas that influence the quality of life of older adults. The goal of the initiative is to make the community livable for all ages.
Continuum of Care Action Plan to End Homelessness 2015 - 2017	Grand Rapids Area Coalition to End Homelessness	This plan is a three-year action plan to end homelessness in Kent County and aligns with the strategic plan goals to reduce and end homelessness.
Vision to End Homelessness (2004)	Grand Rapids Area Coalition to End Homelessness	This plan seeks to end homelessness in Kent County and aligns with the strategic plan goals to reduce and end homelessness.
Assessment of the Vision to End Homelessness (2015)	Grand Rapids Area Coalition to End Homelessness	This report is an assessment of the impact and progress of the Vision to End Homelessness. The recommendations align with the Strategic Plan to reduce and end homelessness.
Kent County Community Action - Community Needs Assessment (2019)	Kent County Community Action	This assessment outlines the needs of Kent County residents and aligns with the strategic goals of reducing unemployment, improving health, increasing access and affordability of housing, and reducing poverty.
Kent County Coordinated Transit-Human Services Transportation Plan (2017)	Grand Valley Metro Council	The Grand Valley Metro Council seeks to improve mobility and transportation options to Kent County residents and stakeholders. The initiatives outlined in this plan are consistent with the strategic plan goal to increase transportation service accessibility and affordability for Kent County residents.
Redefining the Path Home: System Building for Housing Stability in Kent County (2020)	KConnect	This plan aligns with the goals of reducing housing instability and cultivating a more equitable housing system in Kent County.
Grand Rapids Housing Commission 2020-2024 Five-Year Plan	City of Grand Rapids Housing Commission	This plan aligns with the goals of expanding affordable housing access in the City of Grand Rapids.
Wyoming Housing Commission 2019-2024 Five-Year Plan	City of Wyoming Housing Commission	This plan aligns with the goals of expanding affordable housing access in the City of Wyoming
Kent County Housing Commission Five-Year Plan 2019-2024	Kent County Housing Commission	This plan aligns with the goals of expanding affordable housing access throughout Kent County

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Analysis of Impediments to Fair Housing Choice	City of Grand Rapids and Kent County Community Development Departments	The Analysis of Impediments to Fair Housing Choice aligns with the goals of removing public and private sector barriers to fair housing choice.
Grand Rapids Eviction Prevention Pilot Program Year 3 Evaluation Report (2020)	City of Grand Rapids, 61 st District Court, MDHHS Kent County Office, The Salvation Army	This report outlines assesses the outcomes of the three-year Eviction Prevention Pilot Program and aligns with the goals of reducing housing instability.
Housing Needs and Opportunties (2020)	Housing Next	This plan aligns with the goals of expanding affordable housing access in the City of Grand Rapids and Kent County.
Mayor's Lead Free Kids Advisory Committee Report (2020)	City of Grand Rapids	This plan aligns with the goals of reducing lead- based paint hazards and instances of lead- based paint poisoning.
Kent County Lead Task Force Report (2018)	Kent County	This plan aligns with the goals of reducing lead- based paint hazards and instances of lead- based paint poisoning.

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

During the preparation of the consolidated plan all local jurisdictions and most public entities within Kent County were consulted or invited to participate in focus groups and public meetings. The following public entities were invited to consult and comment on the Consolidated Plan.

Table 7: Units of Government or Other Public Entities Consulted

Table 7. Chills of Government of Other Table Entitles Consulted	
U.S. Department of Agriculture	Plainfield Charter Township
Rockford Housing Commission	Algoma Township
Wyoming Housing Commission	Alpine Township
Kent County Housing Commission	Cascade Township
Grand Rapids Community College	Village of Casnovia
West Michigan Works	City of Kentwood
City of Wyoming	City of Walker
Grand Rapids Charter Township	Gaines Township
Village of Sand Lake	Nelson Township
Kent County Health Department	Solon Township
Michigan State Housing Development Authority	City of Grandville

PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)

Summary of citizen participation process/Efforts made to broaden citizen participation.

Due to the COVID-19 pandemic, all citizen participation efforts were facilitated online because no group gatherings were allowed by order of the State of Michigan. Efforts were undertaken to reach stakeholders through direct email, social media posts and paid advertising. All outreach materials were prepared in English and Spanish, and all online public planning meetings were held in English and Spanish.

Summarize citizen participation process and how it impacted goal setting.

The City of Grand Rapids and Kent County undertook a series of efforts to engage community stakeholders in the development of the Consolidated Plan. COVID-19 restrictions required non-traditional outreach and planning meetings instead of in-person discussions. During the process, an online Community Needs and Priorities Survey was distributed through various means including direct email, posting on agency social media accounts and paid advertising through Facebook. The online survey was available from September 30, 2020 through November 13, 2020 and resulted in 390 responses. The full survey results are in Appendix D.

In addition to the survey, nine (9) focus groups were held from September 15, 2020 through September 18, 2020. Regional focus group topics included: equity and inclusion, affordable housing and fair housing needs and priorities, economic development needs and priorities, and homeless and special needs housing priorities. Jurisdiction-specific focus groups included Grand Rapids neighborhood leadership and Kent County cities, villages, and townships. Over 150 individuals were invited to participate in these focus groups. The results from the focus group conversations are listed in Appendix B.

Focus Group Topics	Date	Number of Participants
Kent County Cities, Villages and Townships	September 15, 2020 at 1:00 PM	16
First Equity Focus Group	September 16, 2020 at 8:30 AM	10
Second Equity Focus Group	September 16, 2020 at 10:30 AM	5
First Affordable Housing Focus Group	September 16, 2020 at 1:00 PM	14
Grand Rapids Neighborhood Leadership	September 16, 2020 at 3:00 PM	13
Economic Development	September 17, 2020 at 8:30 AM	16
Second Affordable Housing Focus Group	September 17, 2020 at 1:00 PM	9
Third Affordable Housing Focus Group	September 17, 2020 at 3:00 PM	8
Grand Rapids Area Continuum of Care	September 18, 2020 at 10:00 AM	24

Table 8: Focus Groups

The public was invited to attend a series of online public forums that took place October 7, 2020 through October 15, 2020. The online forums were held in the evening for convenience and to accommodate as many working residents as possible. Four forums targeted Kent County Residents (two in English and two in Spanish), and six forums targeted Grand Rapids Residents (three in English and three in Spanish). The feedback received from the various focus groups, online survey responses and the public forums were used to the shape the goals, objectives and priorities outlined in the Consolidated Plan.

Citizen Participation Outreach

Table 9: Citizen Participation Outreach

Mode of Outreach and Target	Response/Attendance	Summary of Comments Received	Comments Accepted/Not Accepted	URL (If applicable)
Online Survey Non-English Speaking: Spanish Non-targeted/broad community	390 survey responses received	Not applicable	All responses were accepted.	https://www.sur veymonkey.com/ r/Community_Ne eds_and_Prioriti es_Survey
Public Forums Non-English Speaking: Spanish Non-targeted/broad community	Four (4) people attended	All comments summarized in the Appendix	All comments were accepted.	Not applicable
Focus Group Meetings Non-targeted/ broad community	115 people participated	All comments summarized in the Appendix	All comments were accepted.	Not applicable

				rage 1
Mode of Outreach and Target	Response/Attendance	Summary of Comments Received	Comments Accepted/Not Accepted	URL (If applicable)
Public Meetings Minorities Non-English Speaking: Spanish Persons with Disabilities Non-targeted/broad community	A public hearing was held before Kent County Community Action staff on January 21, 2021 and the Grand Rapids City Commission on January 26, 2021. A total of six (6) comments were received.	One individual commented on the need to address renewable energy, and another recommended prioritization of contracts for nonprofit developers and focus on sustainability, particularly environmental health. At each hearing, (two total comments) an organization expressed appreciation for support of fair housing services. Organizations also asked questions about income qualifications, and Kent County's funding application process.	All comments were accepted and incorporated as applicable in the final Plan.	Not applicable
Newspaper Ad/Internet Outreach/Media Releases Minorities Non-English Speaking: Spanish Persons with Disabilities Non-targeted/broad community	Ten (10) written comments were received	Ten (10) individuals offered a number of comments and recommendations on a variety of topics including equity, prioritization of affordable rental housing, energy efficiency, geographic targeting, housing development monitoring and oversight, and landlord engagement.	All comments were accepted and incorporated as applicable in the final Plan, while some were of personal nature and were addressed separately, as feasible, by Grand Rapids staff.	Not applicable

Mode of Outreach and Target	Response/Attendance	Summary of Comments Received	Comments Accepted/Not Accepted	URL (If applicable)
Electronic Mail Outreach Subrecipients, contractors and other partners identified in the institutional structure section of this Plan	One (1) written comment was received	One (1) organization commented the Plan is well done, provides some great data, and will be helpful for preparing future grant applications.		Not applicable

Needs Assessment

NA-5 Overview

The Needs Assessment examines residents' housing needs including affordable housing and special needs housing. The sections within the Needs Assessment include:

- Housing Needs Assessment
- Disproportionately Greater Need
- Public Housing
- Homeless Needs Assessment
- Non-Homeless Needs Assessment
- Non-Housing Community Development Needs

The assessment identifies those needs with the highest priorities which influence the goals and outcomes of the strategic plan. The data contained in this section is from the 2014-2018 American Community Survey, the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) or third-party data venders through ESRI. The various tables found in the Needs Assessment outline the Census data for Kent County, Grand Rapids, Wyoming, and the "Balance of County." The Balance of County data excludes the cities of Grand Rapids and Wyoming. The quantitative data is supplemented by qualitative data gathered through the community engagement process.

The housing portion of the needs assessment largely focuses on housing problems that residents may experience. HUD defines housing problems as:

- Units lacking complete kitchen facilities.
- Units lacking complete plumbing (bathroom) facilities.
- Housing cost burden of more than 30% of household income. Housing costs include rent and utilities for renter households, and mortgage payments, utilities, taxes, and insurance for homeowners.
- Overcrowding, which HUD defines as more than one person per room, not including bathrooms, porches, foyers, halls, or half-rooms.

The CDBG and HOME programs operate under federally-established income limits. These limits are based on the area median family income (AMI) of the Grand Rapids – Wyoming Metropolitan Statistical Area (MSA) and are updated annually. The MSA is comprised of Iona, Kent, Montcalm, and Ottawa counties. The ESG program is not subject to income requirements.

Generally, very-low income refers to incomes at or below 30 percent of AMI; low-income refers to incomes between 31 and 50 percent of AMI; moderate-income refers to incomes between 51 and 80 percent of AMI; all adjusted for family size. The CDBG and HOME programs target low- and moderate-income beneficiaries; except that HOME rental activities can benefit those with income up to 60% AMI. ESG activities are assumed to benefit low- and moderate-income persons.

Table 10 provides the current income limits subject to annual adjustments by HUD.

Household Size	Extremely Low Income (30% AMI)	Very Low Income (50% AMI)	60% AMI	Low Income (80% AMI)
1	\$16,800	\$28,000	\$33,600	\$44,800
2	\$19,200	\$32,000	\$38,400	\$51,200
3	\$21,960	\$36,000	\$43,200	\$57,600
4	\$26,500	\$40,000	\$48,000	\$64,000
5	\$31,040	\$43,200	\$51,840	\$69,150
6	\$35,580	\$46,400	\$55,680	\$74,250
7	\$40,120	\$49,600	\$59,520	\$79,400
8	\$44,660	\$52,800	\$63,360	\$84,500

Table 10: FY 2020 Income Limits – Grand Rapids – Wyoming Metro Area

Source: U.S. Department of Housing and Urban Development (HUD), effective April 1, 2020

NA-10 Housing Needs Assessment

Over the past 20 years the Kent County region has added nearly 80,000 residents. While Grand Rapids lost population between 2000 and 2010, an estimated 15,000 residents have since moved to the City. Over the next five years, the region is expected to grow another 4.0% to a population of approximately 680,000. Grand Rapids is estimated to grow to approximately 210,000 residents, and the City of Wyoming to 81,000 residents.

Summary of Housing Needs

Grand Rapids and Kent County continue to grow in terms of population size. Within the region, Grand Rapids is the largest city and comprises approximately 30% of the regional population. The City of Wyoming comprise 12% of the Kent County population, and the remaining townships, villages and cities comprise the remaining 58% of the county's population. Despite a drop in population between 2000 and 2010 in Grand Rapids, demographic projections estimate a population increase over the next five years. The county is estimated to add 26,331 residents. Of these, Grand Rapids is estimated to gain 7,250 additional residents, Wyoming 2,900 new residents, and the balance of the county 16,181. With an already tight housing market, additional housing units will need to be brought online to effectively accommodate this projected growth.

	Grand Rapids	Wyoming	Balance of County	Kent County
	Population	Population	Population	Population
2000	197,327	69,582	307,426	574,335
2010	187,941	72,184	342,497	602,622
2020 Estimate	202,436	78,252	373,594	654,282
2025 Projection	209,686	81,152	389,775	680,613

Table 11. Denulation by Community

Source: US Census, ESRI Demographics

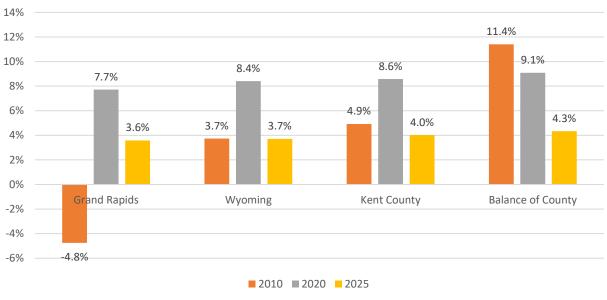


Figure 1: Regional Population Change

Regional Population Change 2000 - 2025

Source: US Census, ESRI

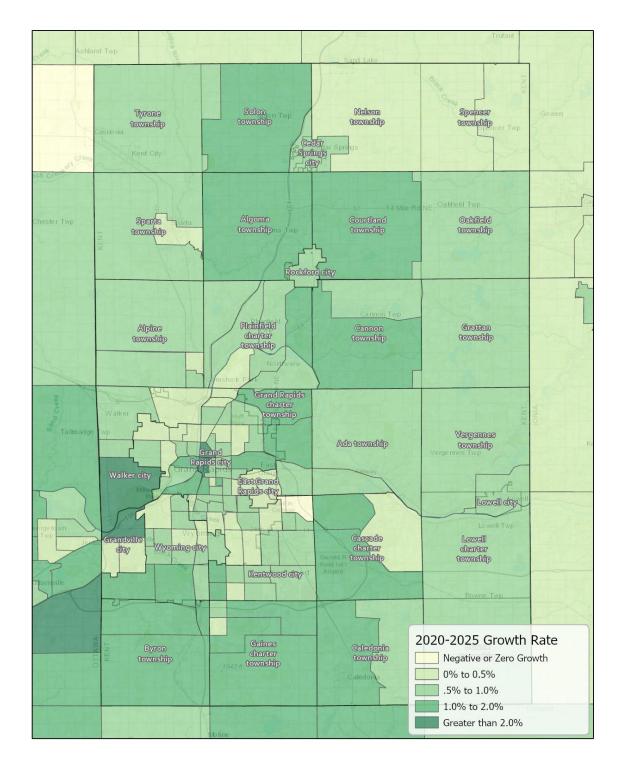
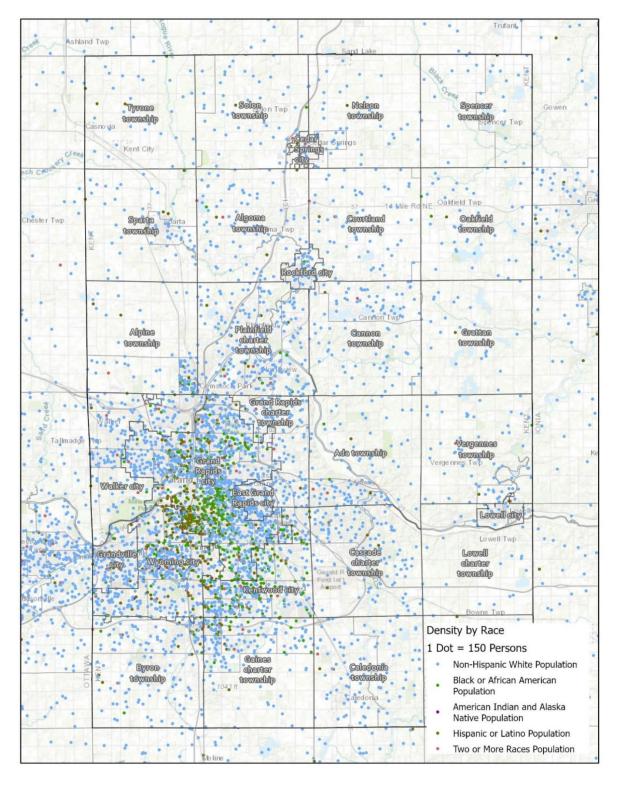


Figure 2: Regional Population Growth

Source: ESRI Demographics

Figure 3: Race and Ethnicity by Density



Source: 2012-2017 ACS

Overall, Kent County is racially less diverse than Michigan as a whole, with Grand Rapids being the exception. Michigan overall is 74.8% White. Kent County is estimated to be 77.11% White, 10% Black, and 11.11% Hispanic. However, when Grand Rapids and Wyoming are removed the balance of the county is 86.8% White, 4.3% Black, and 5.3% Hispanic. Table 12 illustrates population by race, based on population numbers from the year 2000. Grand Rapids is 61.22% White, 21.4% Black and 17.56% Hispanic. The City of Wyoming is 71.89% White, 7.47% Black and 22.26% Hispanic.

2020 Population by Race	Grand Rapids		Grand Ranids Wyoming			Kent Co	ounty	
White	123,936	61.2%	56,256	71.9%	324,316	86.8%	504,508	77.1%
Black/African American	43,475	21.5%	5,849	7.5%	16,171	4.3%	65,495	10.0%
American Indian/Alaska Native	1,551	0.8%	489	0.6%	1,331	0.4%	3,371	0.5%
Asian	5,589	2.8%	3,321	4.2%	14,415	3.9%	23,325	3.6%
Pacific Islander	138	0.07%	43	0.05%	119	0.0%	300	0.05%
Other Race	17,683	8.7%	8,703	11.1%	7 <i>,</i> 068	1.9%	33,454	5.1%
Population of Two or More Races	10,065	5.0%	3,591	4.6%	10,173	2.7%	23,829	3.6%
Hispanic Population	35,546	17.6%	17,420	22.3%	19,749	5.3%	72,715	11.1%

Table 12: 2020 Estimated Population by Race

Source: ESRI Demographics

Over the next five years, the racial diversity within all Kent County communities is expected to increase. Table 13 illustrates the projected 2025 population by race within the three jurisdictions and the balance of Kent County. The share of all races, and the share of Hispanic population are all estimated to increase, while the share of White population is estimated to decline in Grand Rapids, Wyoming, and the balance of the county.

2025 Population by Race	Grand Rapids		Grand Rapids Wyoming		Balance of County		Kent County	
White	124,492	59.4%	56,431	69.5%	332,682	85.4%	513,605	75.5%
Black/African American	45,642	21.8%	6,181	7.6%	17,336	4.5%	69,159	10.2%
American Indian/Alaska Native	1,640	0.9%	520	0.6%	1,391	0.4%	3,551	0.5%
Asian	6,803	3.2%	4,100	5.0%	18,107	4.7%	29,010	4.3%
Pacific Islander	143	0.07%	44	0.05%	125	0.03%	312	0.05%
Other Race	19,554	9.3%	9,795	12.1%	8,174	2.1%	37,523	5.5%
Population of Two or More Races	11,412	5.4%	4,082	5.0%	11,959	3.1%	27,453	4.0%
Hispanic Population	39,388	18.8%	19,560	24.1%	22,964	5.9%	81,912	12.0%

Table 13: 2025 Projected Population by Race

Source: ESRI Demographics

The population by household type is also evolving in Kent County and its communities. The Census defines a household as all the people that occupy a housing unit, and there are two types of households: family and non-family. A family household is one in which two or more people residing together are related by birth, marriage, or adoption, plus any unrelated individuals living in the household. A non-family household is one in which the householder lives alone (single individual) or where the householder shares the unit exclusively with people to whom he or she is not related.

The number of people living in non-family households has continued to grow, and over the next five years, Kent County is expected to see its non-family population grow from 127,995 to 135,661. In Grand Rapids, the number of residents in non-family households (singles, or unrelated individuals) is expected to grow from 55,339 (28.48%) in 2020 to 58,534 (29.04%) in 2025. This is important because it speaks to the need of new housing units, not just housing structures. New, high density, multi-unit developments will need to be developed to help accommodate this growth in non-family households.

Fable 14: Population by Household Type										
Grand I	Rapids	Wyo	ming	Balance of County		Kent County				
187,941		72,184		342,497		602,	622			
179,676	95.6%	71,826	99.5%	339,767	99.2%	591,269	98.1%			
131,224	69.8%	58,368	80.9%	290,784	84.9%	480,376	79.7%			
48,452	27.0%	13,458	18.7%	48,983	14.4%	110,893	18.8%			
202,436		78,252		373,594		654,	282			
194,325	96.0%	77,888	99.5%	370,530	99.2%	642,743	98.2%			
138,986	68.7%	62,413	79.8%	313,349	83.9%	514,748	78.7%			
55,339	28.5%	15,475	19.9%	57,181	15.4%	127,995	19.9%			
209,686		81,152		389,775		680,	613			
201,575	96.1%	80,789	99.6%	386,710	99.2%	669,074	98.3%			
143,041	68.2%	64,456	79.4%	325,916	83.6%	533,413	78.4%			
58,534	29.0%	16,333	20.2%	60,794	15.7%	135,661	20.3%			
	Grand F 187,941 179,676 131,224 48,452 202,436 194,325 138,986 138,986 203,686 201,575 143,041	Grand Radian 187,941 179,676 95.6% 131,224 69.8% 48,452 27.0% 202,436 700 138,986 96.0% 138,986 28.5% 209,686 700 201,575 96.1% 143,041 68.2%	Grand Rights Wyor 187,941 72,184 179,676 95.6% 71,826 131,224 69.8% 58,368 48,452 27.0% 13,458 202,436 78,252 138,986 68.7% 62,413 138,986 28.5% 15,475 209,686 81,152 143,041 68.2% 64,456 64,456	Grand Right $Wyoing187,94172,184179,67695.6\%71,82699.5\%131,22469.8\%58,36880.9\%48,45227.0\%13,45818.7\%202,43677,88899.5\%138,98668.7\%62,41379.8\%138,98628.5\%15,47519.9\%209,68681,152120,57596.1\%80,789143,04168.2\%64,45679.4\%$	Grand $\[mathbb{ \]}$ WyomingBalance of187,94172,184342,497179,67695.6%71,82699.5%339,767131,22469.8%58,36880.9%290,78448,45227.0%13,45818.7%48,983202,43678,252373,594194,32596.0%77,88899.5%370,530138,98668.7%62,41379.8%313,34955,33928.5%15,47519.9%57,181209,68681,152389,775386,710143,04168.2%64,45679.4%325,916	Grand ReputsWyominBalance of County $187,941$ $72,184$ $342,497$ $179,676$ 95.6% $71,826$ 99.5% $339,767$ 99.2% $131,224$ 69.8% $58,368$ 80.9% $290,784$ 84.9% $48,452$ 27.0% $13,458$ 18.7% $48,983$ 14.4% $72,2436$ $78,252$ $73,594$ $71,259$ $71,259$ $194,325$ 96.0% $77,888$ 99.5% $313,349$ 83.9% $138,986$ 68.7% $62,413$ 79.8% $57,181$ 15.4% $720,686$ 79.5% 19.9% $389,775$ 7123 $201,575$ 96.1% $80,789$ 99.6% $386,710$ 99.2% $143,041$ 68.2% $64,456$ 79.4% $325,916$ 83.6%	Grand \mathbb{P} pds Wyomin Balance of Cunty Kent Cunty 187,941 72,184 342,497 662,4 179,676 95.6% 71,826 99.5% 339,767 99.2% 591,269 131,224 69.8% 58,368 80.9% 290,784 84.9% 480,376 48,452 27.0% 13,458 18.7% 48,983 14.4% 110,893 202,436 78,252 373,594 104,924 642,743 654,743 194,325 96.0% 77,888 99.5% 313,349 83.9% 642,743 138,986 68.7% 62,413 79.8% 313,349 83.9% 514,748 138,986 68.7% 15,475 19.9% 57,181 15.4% 127,995 209,686 81,152 389,775 680,70 92.2% 669,074 92.2% 669,074 143,041 68.2% 64,456 79.4% 325,916 83.6% 533,413			

Table 14: Population by Household Type

Source: ESRI Demographics

Housing Needs by Community

The next section outlines the specific housing needs by community for Kent County, Grand Rapids, and Wyoming. The housing needs discussed in this section cover the following housing problems:

- Cost burden
- Substandard housing (lacking complete kitchen or bathroom facilities)
- Overcrowding (more than one person per room)

Kent County

The following tables illustrate the housing needs for the balance of the county which excludes the City of Grand Rapids and the City of Wyoming. Overall, the balance of the county is wealthier than Grand Rapids or Wyoming. Table 15 illustrates the income distribution of households by tenure in the balance of Kent County. While the number of extremely low income (less than 30% AMI) is 7.37% of the total households, 17.21% are renters. Over 35% of renters are either extremely or very-low income, compared to just over 11% of owner households.

Income Range	Owner		Renter		Total Households	
0 - 30% AMI	4,745	4.5%	5,245	17.2%	9,990	7.4%
30% - 50% AMI	7,055	6.7%	5,685	18.7%	12,740	9.4%
50% - 80% AMI	14,410	13.7%	7,515	24.7%	21,925	16.2%
80% to - 100% AMI	10,910	10.4%	4,010	13.2%	14,920	11.0%
Greater than 100% AMI	68,000	64.7%	8,025	26.3%	76,025	56.1%
Total	105,120	100%	30,480	100%	135,600	100%

Table 15: Income Distribution by Tenure - Balance of County

Source: 2013 – 2017 ACS

Kent County renters have a higher proportion of households experiencing housing cost burden than owners as illustrated in Table 16. Over 36% of renter households have a cost burden over 30%, compared to approximately 16% of homeowners. However, when looking at the absolute number of households experiencing a cost burden, there are more cost burdened owner households than renter households.

Table 16: Housing Cost Burden – Balance of County

Housing Cost Burden	Owner		Renter		Total Households	
Less than 30%	87,655	83.4%	19,015	62.4%	106,670	78.7%
30% to 50%	10,845	10.3%	6,331	20.8%	17,176	12.7%
Greater than 50%	6,113	5.8%	4,853	15.9%	10,966	8.1%
Cost Burden not available	505	0.5%	285	0.9%	790	0.6%
Total	105,118	100%	30,484	100%	135,602	100%

Source: 2013-2017 CHAS

Figure 4 illustrates where extremely low-income Kent County residents live by tenure. The map shows the percentage of extremely low-income renters and homeowners on a gradient of low concentration to high concentration. Renter households are illustrated in pink and owner households are blue. The darker the shade, the higher the concentration of that particular household type. Areas that are white indicate low percentage of extremely low-income renters and homeowners, while areas that are purple

(a combination of pink and blue) indicate a high concentration of both low-income renters and homeowners. This map is useful to illustrate where these extremely low-income residents are concentrated and whether assistance programs should be targeted to renter households, owner households or both.

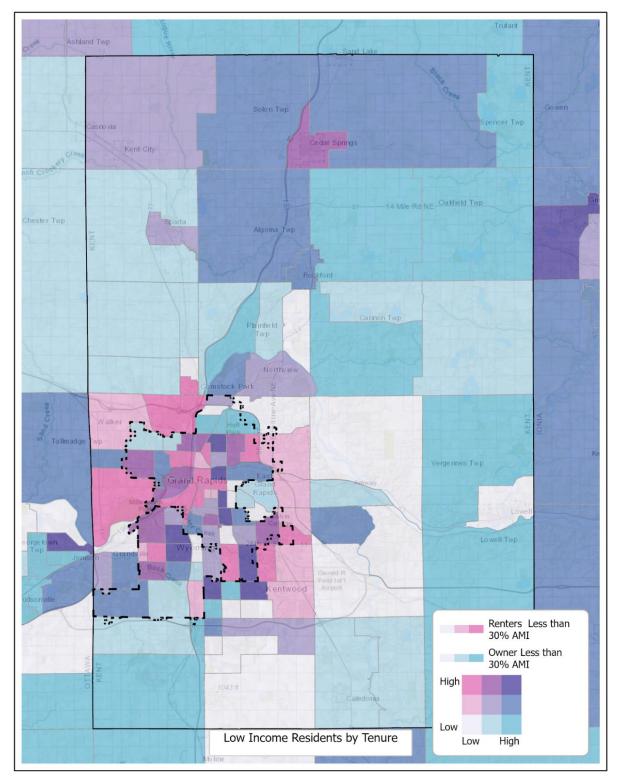


Figure 4: Low Income Households by Tenure – Kent County

Source: 2013-2017 CHAS

Table 17 through Table 19 illustrate the number of households experiencing a housing cost burden by income strata and tenure. Within the balance of the county, over 17,000 households have a cost burden greater than 30% and nearly 11,000 have cost burden greater than 50%. Over 81% of extremely low-income households are severely cost burdened.

	Cost burden > 30%		Severe Cost bur	den > 50%	Total	
0 - 30% AMI	1,525	18.9%	6,551	81.1%	8,076	100%
30% - 50% AMI	5,630	70.6%	2,346	29.4%	7,976	100%
50% - 80% AMI	5,640	78.8%	1,522	21.3%	7,162	100%
80% to - 100% AMI	2,190	91.8%	197	8.3%	2,387	100%
Greater than 100% AMI	2,191	86.2%	350	13.8%	2,541	100%
Total	17,176	61.0%	10,966	39.0%	28,142	100%

Table 17: Income by Cost Burden (Owners and Renters) – Balance of County

Source: 2013 - 2017 CHAS

Table 18 shows cost burden by income for homeowners in the balance of Kent County. Of the extremely low-income homeowners, over 76% are severely cost burdened. The locations of the severely cost burdened owner households are illustrated on the map labeled Figure 5. The map indicates the percentage of severely cost burdened owner households that are distributed throughout Kent County. When looking at the balance of the county, these households are more concentrated in areas of Kentwood, Walker, and Gaines Charter Township.

Table 18: Income by Cost Burden (Owners Only) – Balance of County

	Cost burde	en > 30%	Severe Cost bur	den > 50%	Total Households	
0 - 30% AMI	920	23.4%	3,015	76.6%	3,935	100%
30% - 50% AMI	2,425	64.0%	1,365	36.0%	3,790	100%
50% - 80% AMI	3,555	73.3%	1,292	26.7%	4,847	100%
80% to - 100% AMI	1,865	91.6%	171	8.4%	2,036	100%
Greater than 100% AMI	2,080	88.5%	270	11.5%	2,350	100%
Total	10,845	64.0%	6,113	36.0%	16,958	100%

Source: 2013 - 2017 CHAS

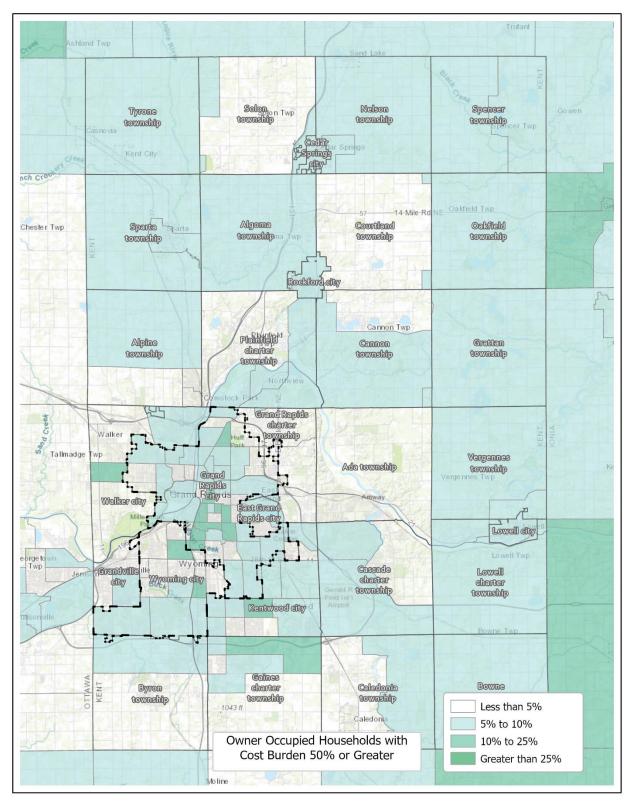


Figure 5: Kent County Owner Occupied Households with 50% Cost Burden or Greater

Source: 2013-2017 CHAS

	Cost burde	Cost burden > 30%		rden > 50%	Total	
0 - 30% AMI	605	14.6%	3,536	85.4%	4,141	100%
30% - 50% AMI	3,205	76.6%	981	23.4%	4,186	100%
50% - 80% AMI	2,085	90.1%	230	9.9%	2,315	100%
80% to - 100% AMI	325	92.6%	26	7.4%	351	100%
Greater than 100% AMI	111	58.1%	80	41.9%	191	100%
Total	6,331	56.6%	4,853	43.4%	11,184	100%

Table 19: Income by Cost Burden (Renters Only) – Balance of County

Source: 2013 – 2017 CHAS

Table 19 illustrates cost burdened renter households by income. Over 8,300 extremely and very low-income renters are cost burdened. Of the extremely low-income renters, over 85% are severely cost burdened.

Figure 6 shows the relative concentration of severely cost burdened renters throughout Kent County. In the balance of the County, severely cost burdened renters are concentrated in communities such as:

- Grattan Township
- Plainfield Charter Township
- East Grand Rapids
- Algoma Township

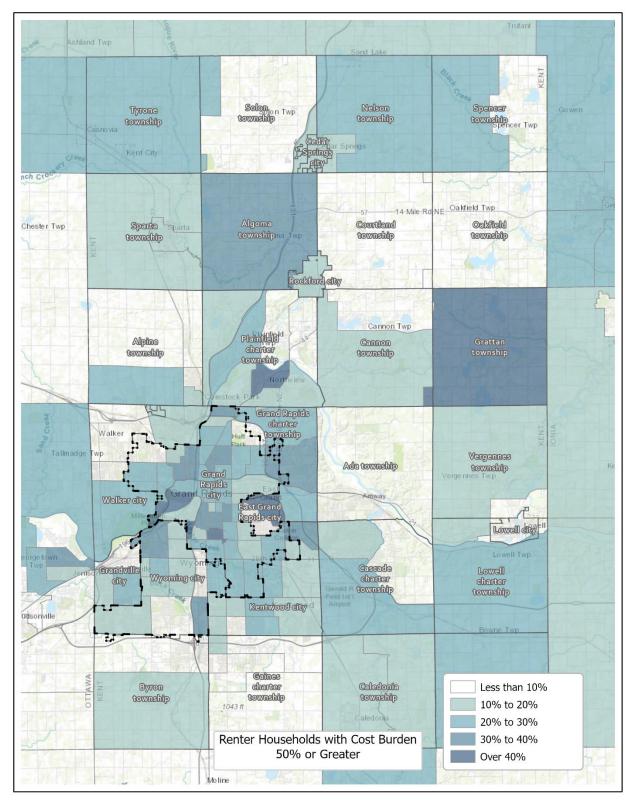


Figure 6: Renter Households with Cost Burden 50% or Greater

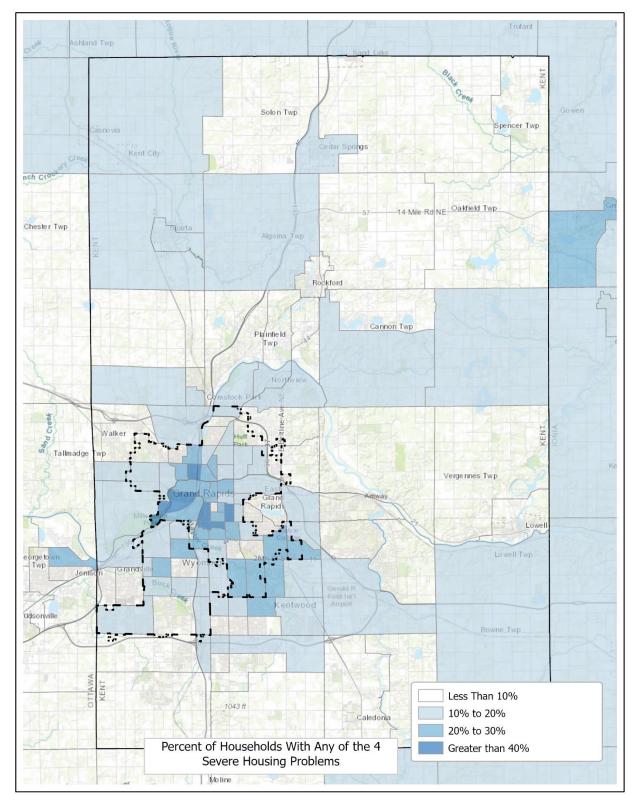


Figure 7: Kent County Percent of Households with Severe Housing Problems

Table 20 Illustrates housing problems (substandard housing, overcrowding, cost burden) of the households in the balance of the county (not including Grand Rapids and Wyoming). More renters live in substandard housing and are in severely overcrowded situations than homeowners. There are significantly more owner households with housing cost burdens than renter households.

Table 20: Housing Prob	D		Renter					Owner		
	< 30% AMI	30- 50% AMI	50- 80% AMI	80- 100% AMI	Renter Total	< 30% AMI	30- 50% AMI	50- 80% AMI	80- 100% AMI	Owner Total
Substandard Housing – Lacking complete plumbing or kitchen facilities	110	165	65	50	85	475	15	36	85	30
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	75	165	240	115	76	671	75	85	220	70
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	65	135	40	45	20	305	25	11	26	40
Housing cost burden greater than 50% of income (and none of the above problems)	535	3,090	2,000	335	116	6,076	860	2,355	3,490	1,855
Housing cost burden greater than 30% of income (and none of the above problems)	3,445	870	220	10	75	4,620	2,985	1,355	1,265	160
Zero/negative Income (and none of the above problems) Source: 2013 – 2017 CH	255 HAS	0	0	0	0	255	510	0	0	0

Table 20: Housing Problems – Balance of County

Table 21 illustrates households with one or more severe housing problems (lacks kitchen, lacks complete plumbing, overcrowding, cost burden) in the balance of the county. As the table indicates, nearly 5,600 renter households and nearly 6,500 owner households have one or more housing problems. The majority of renter households with severe housing problems are very low- and low-income renters. Additional income-based subsidy rental units are likely necessary to address this issue.

			Renter		ř			Owner		
	< 30% AMI	30- 50% AMI	50- 80% AMI	80- 100% AMI	Renter Total	< 30% AMI	30- 50% AMI	50- 80% AMI	80- 100% AMI	Owner Total
Having 1 or more of four housing problems	3,690	1,335	570	225	5,595	3,105	1,480	1,590	300	6,475
Having none of four housing problems	1,295	4,355	6,945	3,790	12,595	1,140	5,570	12,815	10,605	30,130
Having zero or negative income but none of the other housing problems	255	0	0	0	255	510	0	0	0	510

Table 21: Severe Housing Problems – Balance of County

Source: 2013 – 2017 CHAS

Table 22 illustrates the number of households with a cost burden greater than 30% by household type. Within the balance of the county, there are a large number of cost-burdened elderly renter and owner households.

Table 22: Select Households with Cost Burden Greater Than 30% – Balance of County

		Re	nter		Owner			
	< 30% AMI	30-50% AMI	50-80% AMI	Renter Total	< 30% AMI	30-50% AMI	50-80% AMI	Owner Total
Small Related	1,395	1,635	905	3,935	890	955	1,755	3,600
Large Related	235	160	65	460	185	325	615	1,125
Elderly	811	976	330	2,117	2,040	1 <i>,</i> 975	1,761	5,776
Other	1,700	1,415	1,015	4,130	820	535	716	2,071
Total Households	4,141	4,186	2,315	10,642	3,935	3,790	4,847	12,572

Source: 2013 – 2017 CHAS

Table 23 outlines the number of households with a cost burden greater than 50% by household type, income, and tenure in the balance of the county. Similar to the previous table, there are a significant number of elderly cost burdened owner households.

		Rei	nter		Owner			
	< 30% AMI	30-50% AMI	50-80% AMI	Total	< 30% AMI	30-50% AMI	50-80% AMI	Total
Small Related	1,250	370	35	1,655	745	405	505	1,655
Large Related	205	35	0	240	110	125	130	365
Elderly	586	346	60	992	1,460	620	471	2,551
Other	1,495	230	135	1,860	700	215	186	1,101
Total Households	3,536	981	230	4,747	3,015	1,365	1,292	5,672

Table 23: Select Households with Cost Burden Greater Than 50% – Balance of County

Source: 2013 - 2017 CHAS

Table 24 indicates the number of children under the age of six by tenure in the balance of the county. The number of young children is nearly equal between owner and renter households, but proportionately, there are greater percentages living in very low- and low-income households.

		Rei	nter		Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Households with Children Present	1,025	1,015	1,455	3,495	410	920	2,195	3,525

Table 24: Presence of Children Under Age 6 by Tenure and Income – Balance of County

Source: 2013 - 2017 CHAS

City of Grand Rapids

Table 25 illustrates the income distribution of households within Grand Rapids by tenure (renters and owners). Of the total households, over 32% have household income at or below 50% of Area Median Income (AMI). Over 36% have incomes above 100% AMI. When examined by tenure, there is a stark contrast between renter and owner households. Over 51% of owner households earn over 100% AMI, compared with only 19.5% of renter households. Only 16.8% of owner households have income less than 50% AMI, compared to over 50% of renter households, and only 7.14% of owner households have incomes below 30% AMI, compared to nearly 30% of renters. This segment of renters is likely living on the financial edge and may be at risk for a housing crisis event or homelessness.

Table 25: Income Distribution by Tenure – Grand Rapids

	Owner		Rent	ter	Total	
0 - 30% AMI	2,850	7.1%	9,960	29.7%	12,810	17.4%
30% - 50% AMI	3,885	9.7%	7,210	21.5%	11,095	15.1%
50% - 80% AMI	7,700	19.3%	6,395	19.1%	14,095	19.2%
80% to - 100% AMI	5,070	12.7%	3,375	10.1%	8,445	11.5%
Greater than 100% AMI	20,425	51.2%	6,560	19.6%	26,985	36.8%
Total	39,930	100%	33,505	100%	73,435	100%

Table 26 illustrates the change between the number of households within each income cohort over a five-year period (2008-2012 ACS versus 2013-2017 ACS). This comparison only shows the difference between the number of households within each income cohort, it does not yield insights on how or why the changes occurred (e.g. increased wages versus job loss).

	% Change	Renter	% Change	Total	% Change
370	14.9%	-420	-4.1%	-50	-0.4%
-505	-11.5%	115	1.6%	-390	-3.4%
820	11.9%	600	10.4%	1,420	11.2%
-455	-8.2%	550	19.5%	95	1.1%
-1,500	-6.8%	1,065	19.4%	-435	-1.6%
	-505 820 -455	-505 -11.5% 820 11.9% -455 -8.2% -1,500 -6.8%	-505 -11.5% 115 820 11.9% 600 -455 -8.2% 550 -1,500 -6.8% 1,065	-505 -11.5% 115 1.6% 820 11.9% 600 10.4% -455 -8.2% 550 19.5% -1,500 -6.8% 1,065 19.4%	-505 -11.5% 115 1.6% -390 820 11.9% 600 10.4% 1,420 -455 -8.2% 550 19.5% 95 -1,500 -6.8% 1,065 19.4% -435

Table 26: Five-Year Change in Household Income Distribution – Grand Rapids

Source: 2008-2012 ACS, 2013-2017 ACS

On a positive note, the number of renter households earning less than 30% AMI declined by over 4%. There were also increases in the overall number of renter households in higher-income categories.

The number of homeowners earning less than 30% AMI increased by nearly 15%. These are likely senior or disabled homeowners with limited retirement or income streams. The increasing number of very low-income owner households may have difficulty in affording to maintain their homes in the future. Interestingly, Grand Rapids also saw a net decline in moderate- and upper-income households.

Figure 8 illustrates where extremely low-income Kent County residents live by tenure. The map shows the percentage of extremely low-income renters and homeowners on a gradient of low concentration to high concentration. Renter households are illustrated in pink and owner households are blue. The darker the shade, the higher the concentration of that particular household type. Areas that are white indicate a low percentage of extremely low-income renters and homeowners, while areas that are purple (a combination of pink and blue) indicate a high concentration of both low-income renters and homeowners. This map is useful to illustrate where these extremely low-income residents are concentrated and whether assistance programs should be targeted to renter households, owner households or both.

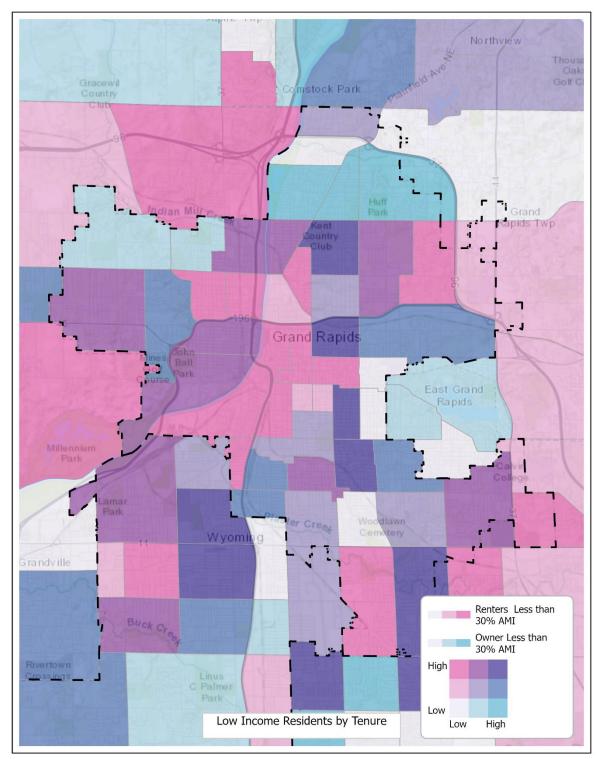


Figure 8: Low Income Residents by Tenure

Cost burden

HUD defines housing cost burden as a household paying more than 30% of its income toward housing costs, including rent or mortgage, property taxes, and utilities. A severely cost burdened household is one paying 50% or more of its income toward housing costs. Cost burden is related to both income and housing costs, and can be solved by increasing household income, lowering housing costs, or a combination of both.

Lower income residents are more likely to have a high housing cost burden, which can lead to eviction or foreclosure, deferred maintenance, or reduced spending on other necessary items such as food, childcare, medical expenses, and transportation. Households with high-cost burden are at risk for a housing crisis which can lead to episodes of homelessness.

Table 27 illustrates that over 32% of all Grand Rapids households are cost burdened, and 17% are severely cost burdened. Not surprisingly, renters are more likely to be cost burdened. Nearly 50% of renter households are cost burdened, compared with almost 19% of owner households. The number of severely cost burdened renter households is more than three and a half times higher than the number of severely cost burdened homeowners.

Housing Cost Burden	Owner		Rent	er	Total	
Less than 30% of Income Spent on Housing (Not Burdened)	32,265	80.8%	16,040	47.9%	48,305	65.8%
30% to 50% Spent on Housing	4,730	11.9%	6,965	20.8%	11,695	15.9%
50% or More Spent on Housing	2,710	6.8%	9,765	29.1%	12,475	17.0%
Cost Burden not available	220	0.6%	725	2.2%	945	1.3%
Total	39,925	100%	33,495	100%	73,420	100%

Table 27: Housing Cost Burden – Grand Rapids

Source: 2013 – 2017 CHAS

The prevalence of cost burdened households is most evident when also evaluating income. Table 28 illustrates the number of cost burdened and severely cost burdened owner and renter households by income categories. Households earning less than 30% AMI make up 17.45% of the total households in Grand Rapids. Nearly 80% of households earning less than 30% AMI are cost burdened, and over two-thirds have a severe housing cost burden. This is a stark contrast to those households earning more than 100% AMI, which make up over 36% of Grand Rapids households. Only 2.45% of those households are cost burdened and less than 1% are severely cost burdened. Programs and activities intended to lower the number of cost burdened households should be targeted to low- and very low-income owners and renters.

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	Cost Burde	Cost Burden > 30%		den > 50%	Total Households						
0 - 30% AMI	10,195	79.6%	8,565	66.9%	12,810	17.5%					
30% - 50% AMI	7,775	70.1%	3,225	29.1%	11,095	15.1%					
50% - 80% AMI	4,790	34.0%	590	4.2%	14,095	19.2%					
80% to - 100% AMI	760	9.0%	85	1.0%	8,445	11.5%					
Greater than 100% AMI	660	2.5%	20	0.07%	26,985	36.6%					
Total	24,180	32.9%	12,485	17.00%	73,430	100%					

Source: 2013 - 2017 CHAS

Table 29 illustrates the cost burden renter households face in Grand Rapids. Among the lowest income renter households, nearly 80% are cost burdened and nearly 70% are severely cost burdened. It is important to note the total number of cost burdened renters, especially at the lower end of the income spectrum far outnumber cost burdened homeowners. Of the 10,190 very low-income cost burdened owner and renter households 7,910 are renters. Programs designed to increase the incomes of these renters or provide rent subsidies are necessary to address this issue.

Programs to reduce cost burden among homeowners could target housing operating costs, such as utility costs. This can be done by creating programs to insulate older homes and provide Energy Star rated doors, windows, HVAC systems, and appliances. Additionally, first-time homebuyer down payment assistance programs can reduce mortgage loan amounts so monthly housing costs are less than 30% of household income.

	Cost Burde	Cost Burden > 30%		rden > 50%	Total Renter Households	
0 - 30% AMI	7,910	79.4%	6,970	70.0%	9,960	29.7%
30% - 50% AMI	5,750	79.8%	2,490	34.5%	7,210	21.5%
50% - 80% AMI	2,490	38.9%	240	3.8%	6,395	19.1%
80% to - 100% AMI	310	9.2%	45	1.3%	3,375	10.1%
Greater than 100% AMI	270	4.1%	20	0.3%	6,560	19.6%
Total	16,730	49.9%	9,765	29.2%	33,500	100%

Table 29: Income by Cost Burden (Renters Only) – Grand Rapids

Source 2013 – 2017 CHAS

Table 30: Income by Cost Burden (Owners Only) – Grand Rapids

	Cost Burg	Cost Burden > 30%		rden > 50%	Total Owner Households		
0 - 30% AMI	2,280	80.0%	1,590	55.8%	2,850	7.1%	
30% - 50% AMI	2,025	52.1%	735	18.9%	3,885	9.7%	
50% - 80% AMI	2,295	29.8%	345	4.5%	7,700	19.3%	
80% to - 100% AMI	450	8.9%	40	0.8%	5,070	12.7%	
Greater than 100% AMI	390	1.9%	0	0.0%	20,425	51.2%	
Total	7,440	18.63%	2,710	6.79%	39,930	100%	

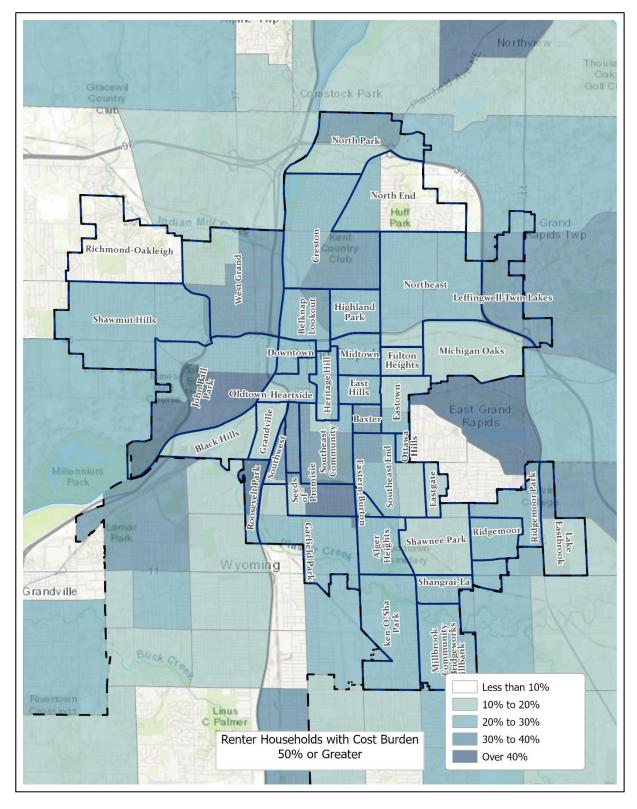


Figure 9: Renter Households with Cost Burden of 50% or Greater

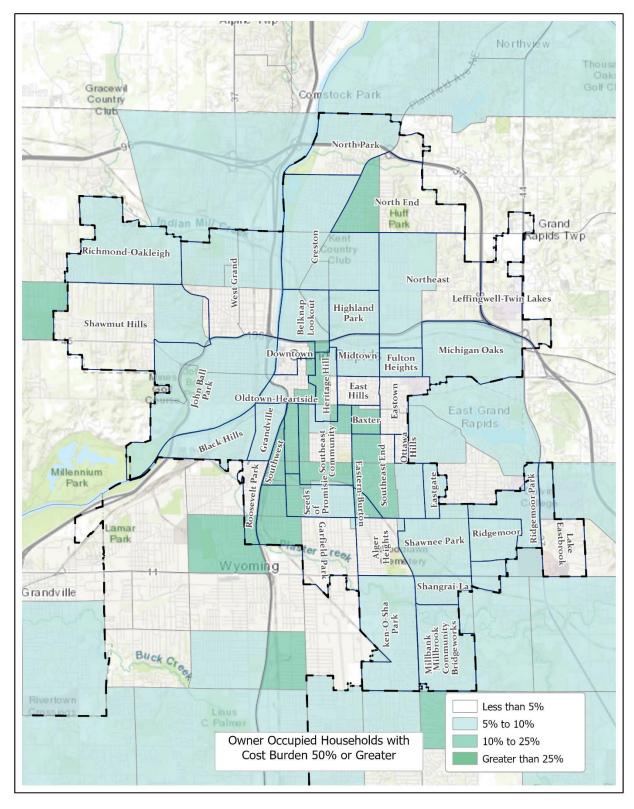


Figure 10: Owner Occupied Households with Cost Burden Greater than 50%

Comparing the changes in the number of cost burdened households can reveal trends related to housing costs or income. In general, cost burden has improved over the past five years. Examining the 2008-2012 ACS versus the 2013-2017 ACS yields the following changes outlined in Table 31 and Table 32. As Table 31 illustrates, the total number of cost burdened households decreased over the preceding five years.

	Cost Burden > 30%		Cost Burde	en > 50%	Total Households		
0 - 30% AMI	-115	-1.1%	170	2.0%	-50	-0.4%	
30% - 50% AMI	-595	-7.1%	-730	-18.5%	-390	-3.4%	
50% - 80% AMI	-725	-13.2%	-480	-44.9%	1,420	11.2%	
80% to - 100% AMI	-905	-54.4%	-80	-48.5%	95	1.1%	
Greater than 100% AMI	-675	-50.6%	-30	-60.0%	-435	-1.6%	
Total	-3,015	-11.1%	-1,150	-8.4%	640	0.9%	

 Table 31: Five-Year Net Change in Housing Cost Burden (Owners and Renters) – Grand Rapids

Source: 2008-2012 ACS, 2013-2017 ACS

However, that decrease was largely driven by the decrease in cost burdened owners, illustrated in Source: 2008-2012 ACS, 2013-2017 ACS

Table 33. While the total number of cost burdened rental households declined, the number of severely cost burdened renter households increased by 189, illustrated in Table 32. The increasing number of renters experiencing a severe cost burden is a concern and could be related to the rising housing costs in Grand Rapids.

	Cost Burden > 30%		Cost Burd	en > 50%	Households		
0 - 30% AMI	-345	-4.2%	155	2.3%	-420	-4.1%	
30% - 50% AMI	105	1.9%	30	1.2%	115	1.2%	
50% - 80% AMI	45	1.8%	25	11.6%	600	10.4%	
80% to - 100% AMI	-180	-36.7%	-40	-47.1%	550	19.5%	
Greater than 100% AMI	85	46.0%	19	19.0%	1,065	19.4%	
Total	-290	-1.7%	189	2.0%	1,910	6.1%	

Table 32: Five-Year Net Change in Housing Cost Burden (Renters Only) – Grand Rapids

Source: 2008-2012 ACS, 2013-2017 ACS

Table 33: Five-Year Net Change in Housing Cost Burden (Owners Only) – Grand Rapids

	8 8		· ·	• /	1		
	Cost Burden > 30%		Cost Burd	len > 50%	Total Households		
0 - 30% AMI	225	11.0%	10	0.6%	370	14.9%	
30% - 50% AMI	-695	-25.6%	-755	-50.7%	-505	-11.5%	
50% - 80% AMI	-780	-25.4%	-510	-59.7%	820	11.9%	
80% to - 100% AMI	-720	-61.5%	-35	-46.7%	-455	-8.2%	
Greater than 100% AMI	-765	-66.2%	-50	-100.0%	-1,500	-6.8%	

Total	-2,735	-26.9%	-1,340	-32.9%	-1,270	-3.1%
Source: 2008-2012 ACS, 2	013-2017 ACS					

Household Type and Needs

The next section examines housing types and needs that are separate from the larger population in Grand Rapids. For example, the needs of small households (less than four people) are different than large families (more than five people) and it is necessary to understand the breadth of those needs for each housing type. In addition to housing type, this section looks at housing problems such as substandard housing and overcrowding.

Table 34 illustrates the number of households by household type and income range. Within Grand Rapids, there are 12,810 households that earn less than 30% AMI. Within that income range, 3,645 are small family households and 1,115 are large family households. More than 3,000 households earning less than 30% AMI have someone over the age of 62 in the home.

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	>100% AMI
Total Households	12,810	11,095	14,095	8,445	26,985
Small Family Households (less than four people)	3,645	3,430	4,695	2,970	11,765
Large Family Households (more than five people)	1,115	1,185	1,530	925	1,990
Household contains at least one person 62-74 years of age	1,825	1,505	2,455	1,420	5,040
Household contains at least one-person age 75 or older	1,225	2,095	1,780	855	1,740
Households with one or more children 6 years old or younger	2,635	2,230	2,500	1,470	3,355

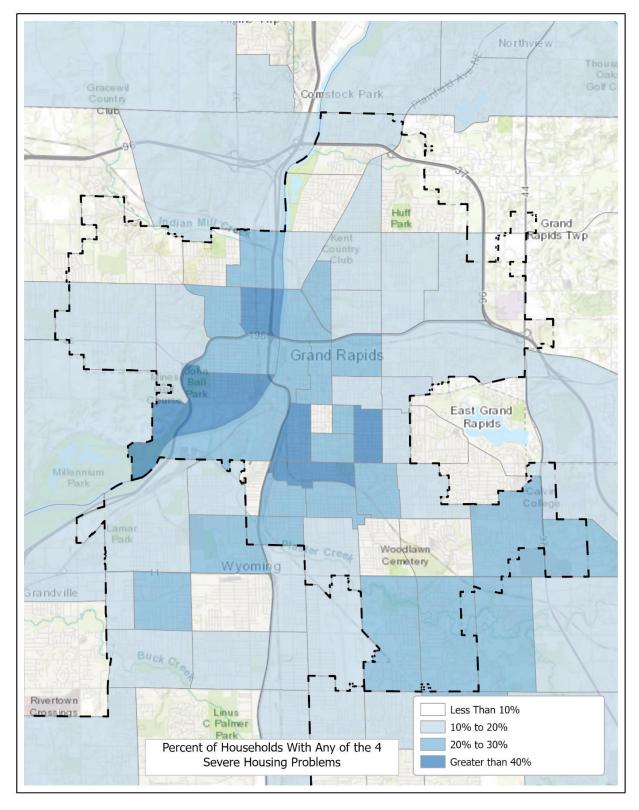
Table 34: Total Households – Grand Rapids

Source 2013 – 2017 CHAS

Table 35 outlines the number of households by income and tenure that face one or more housing problem (substandard housing, overcrowding, or cost burden). As the table indicates, renter households experience significantly more housing issues than homeowners. Within Grand Rapids, over 850 renter households live in substandard housing (lacking complete plumbing or kitchen facilities). Over 360 are living in severely overcrowded housing situations, and almost 9,000 renter households have a cost burden greater than 50%. Addressing the needs of low- and moderate-income renter households is a priority need in Grand Rapids.

Table 35: Households with	Problems	s – Granc	-					_		
			Renter					Owner		
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Renter Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Owner Total
Substandard Housing – Lacking complete plumbing or kitchen facilities	315	285	215	40	855	20	70	20	0	110
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	175	115	75	0	365	45	10	4	0	59
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	275	240	95	190	800	25	70	135	105	335
Housing cost burden greater than 50% of income (and none of the above problems)	6,410	2,245	190	35	8,880	1,570	725	345	40	2,680
Housing cost burden greater than 30% of income (and none of the above problems)	795	3,005	2,175	265	6,240	640	1,220	1,930	410	4,200
Zero/negative Income (and none of the above problems)	680	0	0	0	680	220	0	0	0	220

Table 35: Households with Problems – Grand Rapids



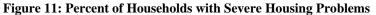


Table 36 illustrates households with one or more Severe Housing Problems (lacks kitchen, lacks complete plumbing, overcrowding, cost burden). As the table indicates, nearly 11,000 renters have one or more housing problems, and the majority of those are very low-income renters. Additional income-based subsidy rental units are likely necessary to help address this issue.

Table 50. Housen				100101110	or and it	-pras					
			Renter			Owner					
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Renter Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Owner Total	
Having 1 or more of four housing problems	7,175	2,885	575	260	10,895	1,655	875	510	145	3,185	
Having none of four housing problems	2,105	4,320	5,820	3,115	15,360	970	3,010	7,190	4,925	16,095	
Having zero or negative income but none of the other housing problems	680	0	0	0	680	220	0	0	0	220	
Source: 2013 – 2	017 CHA	S									

Table 36: Households with Severe Housing Problems – Grand Rapids

Table 37 and Table 38 illustrate the number of specific household types by income and tenure. Table 37 indicates there are 15,705 cost burdened renter households in Grand Rapids compared to 6,600 cost burdened owner households. In almost every category, the number of renter households with needs are nearly double the number of owner-households. Elderly households are the only housing type where the number of households with needs is similar between renters and owners.

Table 37: Types of Households with a Cost Burden Greater Than 30% - Grand Rapids

	Rer	nter		Owner					
0-30% AMI	>30- 50% AMI	>50- 80% AMI	Renter Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Owner Total		
2,590	2,105	380	5,075	520	525	740	1,785		
885	685	85	1,655	135	245	150	530		
1,250	1,025	520	2,795	815	855	690	2,360		
3,190	1,935	1,055	6,180	810	395	720	1,925		
7,915	5,750	2,040	15,705	2,280	2,020	2,300	6,600		
	AMI 2,590 885 1,250 3,190	0-30% >30- AMI 50% 2,590 2,105 885 685 1,250 1,025 3,190 1,935	>30- 50% >50- 80% AMI 2,590 2,105 380 885 685 85 1,250 1,025 520 3,190 1,935 1,055	0-30% AMI>30- 50% 80% AMI>50- 80% AMIRenter Total2,5902,1053805,075885685851,6551,2501,0255202,7953,1901,9351,0556,180	0-30% AMI>30- 50% 80% AMI>50- 80% AMIRenter Total0-30% AMI2,5902,1053805,0755202,5902,1053805,075520885685851,6551351,2501,0255202,7958153,1901,9351,0556,180810	0-30% AMI>30- 50% 80% AMI>50- 80% AMIRenter Total0-30% AMI>30- 50% 	0-30% AMI >30- 50% AMI >50- 80% AMI Renter Total 0-30% AMI >30- 50% AMI >50- 80% AMI 2,590 2,105 380 5,075 520 525 740 2,590 2,105 380 5,075 520 525 740 885 685 85 1,655 135 245 150 1,250 1,025 520 2,795 815 855 690 3,190 1,935 1,055 6,180 810 395 720		

Table 38 illustrates the number of specific household types by income and tenure that have a cost burden greater than 50%. The number of renter households with needs far outweighs the number of owner households with needs.

		Ren	ter		Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Renter Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Owner Total	
Small Related	2,235	1,020	70	3,325	430	190	40	660	
Large Related	730	125	0	855	85	35	0	120	
Elderly	1,050	495	125	1,670	440	330	175	945	
Other	2,960	850	45	3,855	635	180	130	945	
Total	6,975	2,490	240	9,705	1,590	735	345	2,670	

Table 38: Types of Households with a Cost Burden Greater Than 50% - Grand Rapids

Source: 2013 - 2017 CHAS

Table 39 illustrates the number of households with children under the age of six by income and tenure. Children under the age of six are at risk of lead-based paint poisoning. The number of low- and moderate-income renter households with children is nearly twice the number of owner households. Lead-based paint hazard remediation programs should target these households.

Table 39: Presence of Children Under Age 6 by Tenure and Income – Grand Rapids

					0 - 00 000			
		Rer	nter		Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Households with Children Present	2,380	1,605	1,175	5,160	255	625	1,325	2,205
Source: 2013 - 2017 CHAS								

City of Wyoming

Table 40 illustrates the income distribution of households within the City of Wyoming by tenure. Of the total households, approximately 25% have income at or below 50% AMI. Over 40% have incomes above 100% AMI. Among renter households, nearly 43% have incomes below 50% AMI and almost 24% have incomes at or below 30% AMI. This segment of renters is likely living on the financial edge and may be at risk for a housing crisis event.

	Owi	Owner		nter	Total	
0 - 30% AMI	1,140	6.3%	2,305	23.9%	3,445	12.3%
30% - 50% AMI	1,660	9.1%	1,825	18.9%	3,485	12.5%
50% - 80% AMI	3,465	19.0%	2,700	27.9%	6,165	22.1%
80% to - 100% AMI	2,570	14.1%	890	9.2%	3,460	12.4%
Greater than 100% AMI	9,410	51.6%	1,945	20.1%	11,355	40.7%
Total	18,245	100%	9,665	100%	27,910	100%

Table 40: Income Distribution by Tenure – Wyoming

Source: 2013 – 2017 ACS

Table 41 illustrates the five-year change in households by income and tenure in Wyoming. The number of extremely low-income households grew by nearly 10 percent, driven largely by the increase in extremely low-income renter households. The number of low- and moderate-income households grew overall in Wyoming, while there was a net loss of households earning above 100% AMI.

	Owner	% Change	Renter	% Change	Total	% Change
0 - 30% AMI	40	3.6%	270	13.3%	310	9.9%
30% - 50% AMI	-150	-8.3%	30	1.8%	-120	-3.3%
50% - 80% AMI	225	6.9%	250	10.2%	475	8.4%
80% to - 100% AMI	235	10.1%	-65	-6.8%	170	5.2%
Greater than 100% AMI	-260	-2.7%	70	3.7%	-190	-1.6%

Table 41: Five-Year Change in Household Income Distribution – Wyoming

Source: 2008-2012 ACS, 2013-2017 ACS

Approximately 27% of Wyoming households experience a cost burden of at least 30%, illustrated in Table 42. Many renters face significant cost burden in Wyoming. Unlike Grand Rapids, the number of households with a housing cost burden of at least 30% are nearly evenly split between owner and renter households. However, the number of renter households with a cost burden greater than 50% is nearly double the number of owner households.

	Ow	Owner		nter	Total Household	
Less than 30%	14,885	81.5%	5,210	53.9%	20,095	72.0%
30% to 50%	2,285	12.5%	2,249	23.3%	4,534	16.2%
Greater than 50%	1,000	5.5%	2,104	21.8%	3,104	11.1%
Cost Burden not available	85	0.5%	100	1.0%	185	0.7%
Total	18,255	100%	9,663	100%	27,918	100%

Table 42: Housing Cost Burden - Wyoming

Source: 2013 - 2017 CHAS

Lower income households are more likely to face housing cost burden situations. Table 43 illustrates that 85% of very low-income Wyoming residents have a housing cost burden greater than 30%, and nearly 70% have a severe cost burden.

able 43: Income by Cost Burden (Owners and Renters) - Wyoming	

	Cost Burden > 30%		Severe Cost Bur	den > 50%	Total Households		
0 - 30% AMI	2,940	85.3%	2,405	69.8%	3,445	12.3%	
30% - 50% AMI	2,585	74.2%	640	18.4%	3,485	12.5%	
50% - 80% AMI	1,720	27.9%	50	0.8%	6,165	22.1%	
80% to - 100% AMI	169	4.9%	4	0.1%	3,460	12.4%	
Greater than 100% AMI	220	1.9%	0	0.0%	11,355	40.7%	
Total	7,634	27.4%	3,099	11.1%	27,910	100%	

Source: 2013 - 2017 CHAS

Table 44 and Table 45 illustrate cost burden by household tenure. Not surprisingly, there are a higher number of cost burdened renter households than homeowners. However, there are more cost burdened upper income homeowners than renters in the same income category.

	Cost Burde	en > 30%	Severe Cost Bur	den > 50%	Total Households		
0 - 30% AMI	1,985	86.1%	1,765	76.6%	2,305	23.9%	
30% - 50% AMI	1,475	80.8%	295	16.2%	1,825	18.9%	
50% - 80% AMI	845	31.3%	40	1.5%	2,700	27.9%	
80% to - 100% AMI	44	4.9%	4	0.5%	890	9.2%	
Greater than 100% AMI	4	0.2%	0	0.0%	1,945	20.1%	
Total	4,353	45.0%	2,104	21.8%	9,665	100%	

Table 44: Income by Cost Burden (Renters Only) - Wyoming

Source: 2013 – 2017 CHAS

Table 45: Income by Cost Burden (Owners Only) - Wyoming

	Cost Burde	Cost Burden > 30%		rden > 50%	Total Households		
0 - 30% AMI	955	83.8%	640	56.1%	1,140	6.3%	
30% - 50% AMI	1,110	66.9%	345	20.8%	1,660	9.1%	
50% - 80% AMI	880	25.4%	15	0.4%	3,465	19.0%	
80% to - 100% AMI	125	4.9%	0	0.0%	2,570	14.1%	
Greater than 100% AMI	215	2.3%	0	0.0%	9,410	51.6%	
Total	3,285	18.0%	1,000	5.5%	18,245	100%	

The following three tables compare the present data to the previous Consolidated Plan period, showing the five-year net change from 2008-2012 CHAS to 2013-2017 CHAS.

As illustrated in Table 46, Wyoming saw a significant drop in the overall number of cost burdened households over the previous five-year period. However, there was an increase in the number of very low-income households who are cost burdened.

	Cost Burden > 30%	% Change	Cost Burden > 50%	% Change	Total Households	% Change
0 - 30% AMI	365	14.2%	165	7.4%	310	9.9%
30% - 50% AMI	-170	-6.2%	-550	-46.2%	-120	-3.3%
50% - 80% AMI	-525	-23.4%	-295	-85.5%	475	8.4%
80% to - 100% AMI	-471	-73.6%	-76	-95.0%	170	5.2%
Greater than 100% AMI	-590	-72.8%	-55	-100.0%	-190	-1.7%
Total	-1,391	-15.4%	-796	-20.4%	650	2.4%

Table 46: Five-Year Net Change in Housing Cost Burden (Owners and Renters) - Wyoming

Source: 2008-2012 CHAS, 2013-2017 CHAS

Table 47 and Table 48 show the overall drop in cost burdened households was driven by the significant reduction of homeowners facing a cost burden. The number of renter households experiencing a cost burden went up in every category except those earning over 100% AMI.

Table 47: Five-Year Net Change in Housing Cost Burden (Renters Only) - Wyoming

	Cost Burden > 30%	% Change	Cost Burden > 50%	% Change	Total Households	% Change
0 - 30% AMI	385	24.1%	290	19.7%	270	13.3%
30% - 50% AMI	15	1.0%	-205	-41.0%	30	1.7%
50% - 80% AMI	105	14.2%	5	14.3%	250	10.2%
80% to - 100% AMI	29	193.3%	-11	-73.3%	-65	-6.8%
Greater than 100% AMI	-131	-97.0%	-20	-100.0%	70	3.7%
Total	403	10.2%	59	2.9%	555	6.1%

Source: 2008-2012 CHAS, 2013-2017 CHAS

Table 48: Five-Year Net Change in Housing Cost Burden (Owners Only) - Wyoming

	Cost Burden > 30%	% Change	Cost Burden > 50%	% Change	Total Households	% Change
0 - 30% AMI	-10	-1.0%	-120	-15.8%	40	3.6%
30% - 50% AMI	-180	-14.0%	-340	-49.6%	-150	-8.3%
50% - 80% AMI	-625	-41.5%	-295	-95.2%	225	6.9%
80% to - 100% AMI	-500	-80.0%	-65	-100.0%	235	10.1%
Greater than 100% AMI	-455	-67.9%	-35	-100.0%	-260	-2.7%
Total	-1,770	-35.0%	-855	-46.1%	95	0.5%

Source: 2008-2012 CHAS, 2013-2017 CHAS

City of Wyoming Household Type and Needs

The next section examines unique needs and housing types in Wyoming, such as the needs of small households, large families, seniors, etc. In addition, this section examines problems such as substandard housing and overcrowding.

	< 30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	>100% AMI
Total Households	3,445	3,485	6,165	3,460	11,355
Small Family Households	1,215	1,025	2,235	1,765	6,235
Large Family Households	340	390	770	320	970
Household contains at least one person 62-74 years of age	560	555	970	700	1,965
Household contains at least one person age 75 or older	270	615	695	119	530
Households with one or more children 6 years old or younger	660	695	1,630	775	1,789
Source: 2013 – 2017 CHAS					

Table 49: Select Household Types by Income - Wyoming

Table 50 outlines the number of households by income and tenure that face at least one housing problem (substandard housing, overcrowding, or cost burden). As the table indicates, renter households experience substantially more housing issues than homeowners. Nearly four times as many renter households live in substandard housing compared to owner households. Within Wyoming, there are 635 households living in overcrowded or severely overcrowded situations, compared with only 199 owner households. The only area where the number of renter and owner households are similar are those households experiencing a cost burden greater than 50%.

Table 50: Households w		Owner								
	0-30% AMI	>30- 50% AMI	Renter >50- 80% AMI	>80- 100% AMI	Renter Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Owner Total
Substandard Housing – Lacking complete plumbing or kitchen facilities	0	90	25	20	135	15	4	15	0	34
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	230	165	135	0	530	0	45	90	50	185
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0	65	40	0	105	0	4	0	10	14
Housing cost burden greater than 50% of income (and none of the above problems)	220	1,045	795	25	2,085	315	725	800	125	1,965
Housing cost burden greater than 30% of income (and none of the above problems)	1,540	235	40	0	1,815	640	345	15	0	1,000
Zero/negative Income (and none of the above problems) Source: 2013 – 2017 Ch	100 HAS	0	0	0	100	85	0	0	0	85

Table 50: Households with Problems – Wyoming

Table 51 illustrates households with one or more Severe Housing Problems (lacks kitchen, complete plumbing, overcrowding, cost burden). As the table indicates, over 2,500 renter households have one or more housing problems, and the majority of those are very low-income renters. Additional income-based subsidy rental units are likely necessary to address this issue.

Table 51. Houseno			Renter	-	vv yonnių	Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Renter Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Owner Total
Having 1 or more of four housing problems	1,775	555	240	20	2,590	655	405	120	60	1,240
Having none of four housing problems	430	1,270	2,460	870	5,030	400	1,260	3,345	2,510	7,515
Having zero or negative income but none of the other housing problems	100	0	0	0	100	85	0	0	0	85

Table 51: Households with Severe Housing Problems - Wyoming

Source: 2013 – 2017 CHAS

Table 52 illustrates the number of households with a cost burden greater than 30% by household type and tenure. Small households in Wyoming, regardless of tenure, have the highest number of cost burdened households.

Table 52: Types of Households with a Cost Burden Greater Than 30% – Wyoming

	Renter					Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Renter Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Owner Total	
Small Related	690	360	250	1,300	340	440	275	1,055	
Large Related	260	105	45	410	70	155	105	330	
Elderly	259	259	259	259	259	259	259	259	
Other	1,984	1,474	845	4,303	950	1,110	878	2,938	
Total need by income	3,193	2,198	1,399	6,272	1,619	1,964	1,517	4,582	

Table 53 illustrates the number of Wyoming households with a cost burden greater than 50% by tenure and household type.

		Re	nter			Owner			
	< 30% AMI	30-50% AMI	50-80% AMI	Renter Total	< 30% AMI	30-50% AMI	50-80% AMI	Owner Total	
Small Related	560	35	0	595	305	110	0	415	
Large Related	260	0	0	260	25	10	0	35	
Elderly	229	229	229	229	229	229	229	229	
Other	710	85	10	805	135	85	4	224	
Total Need by Income	1,759	349	239	1,889	694	434	233	903	

Table 53: Types of Households with a Cost Burden Greater Than 50% – Wyoming

Source: 2013 – 2017 CHAS

Table 54 identifies the number of children under the age of six by tenure and income. There are nearly 3,000 children in low- and moderate-income households in Wyoming. Renter households have the majority of very low- and low-income households with young children.

Table 54: Presence of Children Under Age 6 by Tenure and Income – Wyoming

	Renter				Owner			
	< 30% AMI	30-50% AMI	50-80% AMI	Renter Total	< 30% AMI	30-50% AMI	50-80% AMI	Owner Total
Households with Children Under Age 6	435	440	725	1,600	225	255	905	1,385
Source: 2013 – 2017 CHAS								

Describe the number and type of single person households in need of housing assistance.

Table 55 illustrates the number of single (non-family) households within each jurisdiction that are cost burdened. Within Grand Rapids, there are approximately 13,000 cost burdened non-family households, and about one third of the households are elderly. In Wyoming, of the over 3,800 non-family households nearly a third are elderly. In the balance of the County, the split is nearly even. In each jurisdiction there are more cost burdened renter households than owner occupied households.

	Cost Burd	en 30-50%	Cost Burden > 50%		Total
	Renter	Owner	Renter	Owner	
Grand Rapids					
Household type is elderly non-family	1,065	1,030	1,610	600	4,305
Other household type (non-elderly non- family)	2,620	1,205	3,855	945	8,625
Wyoming					
Household type is elderly non-family	285	350	399	244	1,278
Other household type (non-elderly non- family)	989	565	805	224	2,583
Balance of County					
Household type is elderly non-family	1,020	2,350	961	1,761	6,092
Other household type (non-elderly non- family)	2,386	1,405	1,860	1,126	6,777

Table 55: Cost Burdened Non-Family Households

Source: 2013 – 2017 CHAS

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

This section examines the potential housing assistance needs for the most vulnerable residents in the community. Table 56 illustrates the number of households within each community where at least one member has a disability. A household may report more than one disability. Within the balance of the County, over 53,000 households have a member with a disability. Of those households, 15,355 have incomes less than 30% AMI. Those residents may be the most vulnerable and have the least means to pay for care or home modifications necessary to remain housed independently.

Over 52,000 households in Grand Rapids have a member that reports one or more disabilities. Of those households, 20,740 have incomes of less than 30% AMI.

Within Wyoming, over 17,700 households have a member who reports one or more disabilities. Of those, 5,495 have incomes less than 30% AMI.

	Cognitive limitation	Vision Impairment	Self-Care or Independent Living Limitation	Ambulatory limitation	Total
Grand Rapids					
0% to 30% AMI	5,580	3,480	5,890	5,790	20,740
30% to 50% AMI	4,250	3,470	4,180	4,625	16,525
50% to 80% AMI	3,370	3,530	3,840	4,615	15,355
Total	13,200	10,480	13,910	15,030	52,620
Wyoming					
0% to 30% AMI	1,620	840	1,345	1,690	5,495
30% to 50% AMI	1,330	1,190	1,350	1,835	5,705
50% to 80% AMI	1,580	1,290	1,830	1,860	6,560
Total	4,530	3,320	4,535	5,385	17,760
Balance of County					
0% to 30% AMI	3,955	3,200	3,530	4,670	15,355
30% to 50% AMI	3,160	4,100	4,080	5,090	16,430
50% to 80% AMI	5,135	5,130	4,970	6,590	21,825
Total	12,250	12,430	12,580	16,350	53,610

Table 56: Households by Income with at Least One Member with a Disability

Source: 2013-2017 CHAS

Domestic Violence

Statistics on domestic violence, dating violence and sex crimes by known subjects are difficult to obtain because historically data on known versus unknown offenders was not captured through the Uniform Crime Reporting (UCR) system. Many police agencies are migrating to the National Incident Based Reporting System (NIBRS) which collects a higher degree of data specificity. While Grand Rapids reports crimes in NIBRS, the victim / offender relationship data is not collected. However, in 2019 there were 144 rapes reported, and 60% of those occurred at a residence. The Kent County Sheriff's Office reported 135 rapes with 77% occurring at a residence.

The YWCA provides shelter and care for women and families affected by domestic and sexual violence. Between October 1, 2018 and September 30, 2019, the YWCA served 641 women and their children in emergency shelter and long-term supportive housing. During that same time period, the agency provided rape exams to 341 women, including 138 children.

What are the most common housing problems?

Cost burden is the most common housing problem for each community, followed by overcrowding. Cost burden problems can be addressed through raising household wages or reducing the overall housing costs.

	Grand Rapids		Wyo	ming	Balance of County	
Lacking complete plumbing or kitchen facilities	1,345	5.2%	214	2.6%	746	2.5%
Cost burden greater than 30% but less than or equal to 50%	11,020	42.7%	4,269	52.0%	16,701	55.7%
Cost burden greater than 50%	11,560	44.8%	2,815	34.3%	10,655	35.5%
With more than 1 but less than or equal to 1.5 persons per room	1,385	5.4%	739	9.0%	1,436	4.8%
With more than 1.5 persons per room	494	1.9%	174	2.1%	457	1.5%
Total	25,804	100%	8,211	100%	29,995	100%

Table 57: Housing Problems by Community

Source: 2013 - 2017 CHAS

Are any populations/household types more affected than others by these problems?

As discussed earlier, low and very low-income renter households are the most effected households with housing problems, particularly issues of cost burden. Non-family households have a greater rate of housing problems than family households. To effectively address these issues, strategies and activities must increase household wages and reduce overall housing costs.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

Individuals at most risk of experiencing homelessness are low-income renters living in overcrowded housing that is not their own. They are living with family or friends. Table 58 shows the number of subfamily households, living in overcrowded situations, and income is less than 80% AMI. There are approximately 500 households at risk.

Table 58: Households at Risk of Homelessness

	Grand Rapids	Wyoming	Balance of County
Owner Occupied	108	10	142
Renter Occupied	145	94	1
Total	253	104	143

Source: 2013 - 2017 CHAS

Homeless needs focus group attendees indicted a need for additional Housing Choice Vouchers and permanent housing as priorities to address the needs of those in rapid rehousing or living in emergency

shelters but have the ability to live in permanent housing. Additional deeply subsidized housing units need to be developed to meet these needs.

Black families are at disproportionate risk of becoming homeless in Kent County. According to KConnect "Redefining the Path Home: System Building for Housing Stability in Kent County" (2020), one (1) in six (6) African American children in Kent County were in the homeless system in 2019, compared to one (1) in 130 White children.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

See above.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

See above.

Discussion

The Grand Rapids and Kent County region continues to grow and add population. Within the region, Grand Rapids is the largest city making up approximately 30% of the population. City of Wyoming residents comprise 12% of the Kent County population, and the remaining townships, villages and cities comprise the remaining 58% of the county's population. Despite a drop in population between 2000 and 2010 in Grand Rapids, Census estimates and projections indicate an increase over the five-year consolidated plan period. The County is estimated to add 26,331 additional residents over the next five years. Grand Rapids is estimated to gain 7,250 additional residents, Wyoming 2,900 new residents, and the balance of the county 16,181.

Many residents, particularly low-income renters and owners face high housing cost burdens and reside in substandard housing:

- More than 22,500 Grand Rapids households are cost burdened.
- More than 17,000 Balance of County households are cost burdened.
- Over 500 Kent County households are at risk of homelessness due to their housing or living conditions.

As the housing needs assessment indicates, there is a need for additional affordable housing to address issues of affordability for current residents. As the population continues to grow, this issue will continue to worsen. With an already tight housing market, additional units will need to be brought online to effectively accommodate this projected growth.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. This section looks at the disproportionately greater need as it related to housing problems.

HUD defines the four housing problems as:

- 1. Lacks complete kitchen facilities
- 2. Lacks complete plumbing facilities (bathrooms)
- 3. Is overcrowded with more than one person per room
- 4. The housing cost burden is greater than 30%

Based on the tables below the following disproportionate needs were identified:

0-30% AMI:

- Black households in each jurisdiction
- Hispanic households in Wyoming

30% - 50% AMI:

- Black households in Grand Rapids
- Hispanic households in Wyoming

50% - 80% AMI:

• No disproportionately greater need

80% - 100% AMI:

• Asian households in Wyoming

Over the next five years Kent County and Grand Rapids, along with their housing partners will work toward addressing these disproportionate needs of low and moderate-income households.

Table 59: Percent of Households by Race

	Kent County	Grand Rapids	Wyoming	Balance of County
White alone, non-Hispanic	80.2%	68.2%	72.8%	88.3%
Black or African-American alone, non-Hispanic	9.0%	18.2%	7.3%	4.4%
American Indian or Alaska Native alone, non-Hispanic	0.3%	0.3%	0.5%	0.2%
Asian alone, non-Hispanic	2.3%	1.7%	2.6%	2.5%
Pacific Islander alone, non-Hispanic	0.02%	0.01%	0.1%	0.01%
Other (including multiple races, non-Hispanic)	1.5%	1.7%	2.7%	1.2%
Hispanic, any race	6.7%	9.8%	14.0%	3.5%
Total	100%	100%	100%	100%
Source: 2013 – 2017 CHAS				

Table 60 illustrates that Black households have a disproportionate housing need. Black households make up 18.21% of Grand Rapids households, yet over 33% of the Black households earning less than 30% AMI have housing problems.

	Housing	Problems	No Housir	ng Problems	No Income	
White alone, non-Hispanic	5,000	48.7%	900	54.7%	400	44.4%
Black or African-American alone, non-Hispanic	3,415	33.3%	505	30.7%	330	36.7%
American Indian or Alaska Native alone, non-Hispanic	50	0.5%	10	0.6%	0	0.0%
Asian alone, non-Hispanic	155	1.5%	10	0.6%	10	1.1%
Hispanic, any race	1,380	13.5%	220	13.4%	125	13.9%
Other (including multiple races, non-Hispanic)	260	2.5%	0	0.0%	35	3.9%
Pacific Islander alone, non- Hispanic	0	0.0%	0	0.0%	0	0.0%
Total	10,260	100%	1,645	100%	900	100%
Source: 2013 – 2017 CHAS						

Table 60: Housing	Problems by	v Race ()% - 30%	AMI –	Grand Rapids
Tuble out Housing	I I UDICIIIS D	y made o	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		or and maplus

Table 61 illustrates that Black households have a disproportionate housing need. Black households make up 7.3% of Wyoming households, yet nearly 20% of the Black households earning less than 30% AMI have housing problems.

	Housing	Problems	No Housing Problems		No income	
White alone, non-Hispanic	1,435	48.4%	185	62.7%	125	64.1%
Black or African-American alone, non-Hispanic	590	19.9%	80	27.1%	0	0.0%
American Indian or Alaska Native alone, non-Hispanic	4	0.1%	0	0.0%	0	0.0%
Asian alone, non-Hispanic	30	1.0%	0	0.0%	30	15.4%
Hispanic, any race	720	24.3%	0	0.0%	25	12.8%
Other (including multiple races, non-Hispanic)	150	5.1%	30	10.2%	15	7.7%
Pacific Islander alone, non- Hispanic	35	1.2%	0	0.0%	0	0.0%
Total	2,964	100%	295	100%	195	100%

Table 61: Housing Problems by Race 0% - 30% AMI – Wyoming

Source: 2013 – 2017 CHAS

Table 62 illustrates that Black households have a disproportionate housing need. Black households make up 7.3% of the balance of Kent County, yet 13.17% of the Black households earning less than 30% AMI have housing problems.

Table 62: Housing Problems by Race 0% - 30% AMI – Balance of County								
	Housing P	roblems	No Housi	ng Problems	No income			
White alone, non-Hispanic	6,285	76.6%	925	89.4%	735	96.7%		
Black or African-American alone, non-Hispanic	1,080	13.2%	10	1.0%	20	2.6%		
American Indian or Alaska Native alone, non-Hispanic	41	0.5%	0	0.0%	0	0.0%		
Asian alone, non-Hispanic	205	2.5%	50	4.8%	0	0.0%		
Hispanic, any race	440	5.4%	5	0.5%	0	0.0%		
Other (including multiple races, non-Hispanic)	150	1.8%	45	4.4%	5	0.7%		
Pacific Islander alone, non- Hispanic	0	0.0%	0	0.0%	0	0.0%		
Total	8,201	100%	1,035	100%	760	100%		
Source: 2013 – 2017 CHAS								

Table 62: Housing Problems by Race 0% - 30% AMI – Balance of County

Table 63 illustrates that Black households have a disproportionate housing need in Grand Rapids. Black households make up 18.21% of Grand Rapids households, yet over 30% of the Black households earning between 30% and 50% AMI have housing problems.

Table 63: Housing Problems by Race 30% - 50% AMI – Grand Rapids

	Housing Problems		No Housing Problen	
White alone, non-Hispanic	3,995	50.0%	2,005	64.6%
Black or African-American alone, non-Hispanic	2,450	30.7%	550	17.7%
American Indian or Alaska Native alone, non- Hispanic	20	0.3%	10	0.3%
Asian alone, non-Hispanic	245	3.1%	19	0.6%
Hispanic, any race	1,090	13.6%	400	12.9%
Other (including multiple races, non-Hispanic)	185	2.3%	120	3.9%
Pacific Islander alone, non-Hispanic	0	0%	0	0%
Total	7,985	100%	3,104	100%

Source: 2013 – 2017 CHAS

Table 64: Housing Problems by Race 30% - 50% AMI – Wyoming

	• 0			
	Housing	Housing Problems		g Problems
White alone, non-Hispanic	1,690	61.9%	605	79.1%
Black or African-American alone, non-Hispanic	215	7.9%	30	3.9%
American Indian or Alaska Native alone, non- Hispanic	10	0.4%	0	0.0%
Asian alone, non-Hispanic	45	1.7%	15	2.0%
Hispanic, any race	705	25.8%	95	12.4%
Other (including multiple races, non-Hispanic)	65	2.4%	20	2.6%
Pacific Islander alone, non-Hispanic	0	0.0%	0	0.0%
Total	2,730	100%	765	100%
Source: 2013 - 2017 CHAS				

Table 65 illustrates that Asian households have a disproportionate housing need. Asian households make up 2.59% of Wyoming, yet over 34% of the Asian households earning between 80% and 100% AMI have housing problems.

Housing Problems		No Housing Problems	
125	53.2%	2,425	75.1%
10	4.3%	310	9.6%
0	0.0%	15	0.5%
80	34.0%	160	5.0%
20	8.5%	240	7.4%
0	0.0%	80	2.5%
0	0.0%	0	0.0%
235	100%	3,230	100%
	10 0 80 20 0 0	10 4.3% 0 0.0% 80 34.0% 20 8.5% 0 0.0% 0 0.0%	10 4.3% 310 0 0.0% 15 80 34.0% 160 20 8.5% 240 0 0.0% 80 0 0.0% 0

Table 65: Housing Problems by Race 80% - 100% AMI – Wyoming

Table 66: Housing Problems by Race 80% - 100% AMI – Balance of County

	Housing Problems		No Housing	Problems
White alone, non-Hispanic	2,405	88.9%	10,655	87.4%
Black or African-American alone, non-Hispanic	85	3.1%	475	3.9%
American Indian or Alaska Native alone, non- Hispanic	0	0.0%	0	0.0%
Asian alone, non-Hispanic	75	2.8%	305	2.5%
Hispanic, any race	80	3.0%	590	4.8%
Other (including multiple races, non-Hispanic)	60	2.2%	165	1.4%
Pacific Islander alone, non-Hispanic	0	0.0%	0	0.0%
Total	2,705	100%	12,190	100%

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. This section looks at the disproportionately greater need as it is related to Severe housing problems.

HUD defines the four severe housing problems as:

- 1. Lacks complete kitchen facilities
- 2. Lacks complete plumbing facilities (bathrooms)
- 3. Is overcrowded with more than 1.5 persons per room
- 4. The housing cost burden is greater than 50%

Table 67: Percent of Households by Race

	Kent County	Grand Rapids	Wyoming	Balance of County
White alone, non-Hispanic	80.2%	68.2%	72.8%	88.3%
Black or African-American alone, non-Hispanic	9.0%	18.2%	7.3%	4.4%
American Indian or Alaska Native alone, non- Hispanic	0.3%	0.3%	0.5%	0.2%
Asian alone, non-Hispanic	2.3%	1.7%	2.6%	2.5%
Pacific Islander alone, non-Hispanic	0.02%	0.01%	0.1%	0.01%
Other (including multiple races, non-Hispanic)	1.5%	1.7%	2.7%	1.2%
Hispanic, any race	6.7%	9.8%	14.0%	3.5%
Total	100%	100%	100%	100%
Source: 2013 - 2017 CHAS				

	Has Severe Housing Problems	Has No Severe Housing Problems	Has Zero Income but, None of the Other Severe Problems
Kent County			
White alone, non-Hispanic	58.2%	66.5%	67.9%
Black or African-American alone, non-Hispanic	24.2%	20.7%	18.9%
Asian alone, non-Hispanic	1.9%	1.7%	2.2%
American Indian or Alaska Native alone, non- Hispanic	0.5%	0.2%	0.0%
Pacific Islander alone, non-Hispanic	0.2%	0.0%	0.0%
Hispanic, any race	11.9%	9.8%	8.1%
Other (including multiple races, non-Hispanic)	3.1%	1.2%	3.0%
Grand Rapids			
White alone, non-Hispanic	48.9%	51.3%	44.4%
Black or African-American alone, non-Hispanic	32.8%	33.5%	36.7%
Asian alone, non-Hispanic	1.6%	0.8%	1.1%
American Indian or Alaska Native alone, non- Hispanic	0.5%	0.5%	0.0%
Pacific Islander alone, non-Hispanic	0.0%	0.0%	0.0%
Hispanic, any race	13.3%	14.0%	13.9%
Other (including multiple races, non-Hispanic)	3.0%	0.0%	3.9%
Wyoming			
White alone, non-Hispanic	43.3%	68.1%	64.1%
Black or African-American alone, non-Hispanic	21.9%	16.9%	0.0%
Asian alone, non-Hispanic	0.6%	1.8%	15.4%
American Indian or Alaska Native alone, non- Hispanic	0.2%	0.0%	0.0%
Pacific Islander alone, non-Hispanic	1.4%	0.0%	0.0%
Hispanic, any race	26.4%	9.6%	12.8%
Other (including multiple races, non-Hispanic)	6.2%	3.6%	7.7%
Balance of County			
White alone, non-Hispanic	75.6%	85.2%	96.7%
Black or African-American alone, non-Hispanic	14.0%	5.8%	2.6%
Asian alone, non-Hispanic	2.7%	2.7%	0.0%
American Indian or Alaska Native alone, non- Hispanic	0.6%	0.0%	0.0%
Pacific Islander alone, non-Hispanic	0.0%	0.0%	0.0%
Hispanic, any race	4.9%	4.5%	0.0%
Other (including multiple races, non-Hispanic)	2.2%	1.9%	0.7%

Table 68: Severe Housing Problems (0%- 30% AMI)

able 09. Severe Housing Froblems (30% - 50% Alvir)	Has Severe Housing Problems	Has No Severe Housing Problems
Kent County		
White alone, non-Hispanic	62.1%	70.4%
Black or African-American alone, non-Hispanic	17.7%	13.8%
Asian alone, non-Hispanic	3.1%	1.5%
American Indian or Alaska Native alone, non-Hispanic	0.0%	0.5%
Pacific Islander alone, non-Hispanic	0.0%	0.0%
Hispanic, any race	14.6%	11.5%
Other (including multiple races, non-Hispanic)	2.5%	2.4%
Grand Rapids		
White alone, non-Hispanic	52.1%	55.1%
Black or African-American alone, non-Hispanic	29.0%	26.0%
Asian alone, non-Hispanic	3.7%	1.7%
American Indian or Alaska Native alone, non-Hispanic	0.0%	0.4%
Pacific Islander alone, non-Hispanic	0.0%	0.0%
Hispanic, any race	13.6%	13.4%
Other (including multiple races, non-Hispanic)	1.6%	3.3%
Wyoming		
White alone, non-Hispanic	71.7%	63.4%
Black or African-American alone, non-Hispanic	2.1%	8.9%
Asian alone, non-Hispanic	0.0%	2.4%
American Indian or Alaska Native alone, non-Hispanic	0.0%	0.4%
Pacific Islander alone, non-Hispanic	0.0%	0.0%
Hispanic, any race	24.1%	22.3%
Other (including multiple races, non-Hispanic)	2.1%	2.6%
Balance of County		
White alone, non-Hispanic	72.2%	83.4%
Black or African-American alone, non-Hispanic	8.0%	6.0%
Asian alone, non-Hispanic	3.2%	1.2%
American Indian or Alaska Native alone, non-Hispanic	0.0%	0.6%
Pacific Islander alone, non-Hispanic	0.0%	0.0%
Hispanic, any race	12.8%	7.2%
Other (including multiple races, non-Hispanic)	3.9%	1.7%

Table 69: Severe Housing Problems (30% - 50% AMI)

Table 70: Severe Housing Problems (50% - 80% AMI)	Has Severe Housing Problems	Has No Severe Housing Problems
Kent County		
White alone, non-Hispanic	72.3%	76.1%
Black or African-American alone, non-Hispanic	6.8%	10.8%
Asian alone, non-Hispanic	2.8%	2.5%
American Indian or Alaska Native alone, non-Hispanic	0.8%	0.4%
Pacific Islander alone, non-Hispanic	0.3%	0.0%
Hispanic, any race	15.8%	8.6%
Other (including multiple races, non-Hispanic)	1.3%	1.7%
Grand Rapids		
White alone, non-Hispanic	69.5%	63.7%
Black or African-American alone, non-Hispanic	13.0%	17.9%
Asian alone, non-Hispanic	0.4%	2.3%
American Indian or Alaska Native alone, non-Hispanic	0.0%	0.4%
Pacific Islander alone, non-Hispanic	0.0%	0.0%
Hispanic, any race	13.9%	13.7%
Other (including multiple races, non-Hispanic)	3.2%	1.9%
Wyoming		
White alone, non-Hispanic	38.9%	73.0%
Black or African-American alone, non-Hispanic	0.0%	6.9%
Asian alone, non-Hispanic	0.0%	2.2%
American Indian or Alaska Native alone, non-Hispanic	5.6%	0.0%
Pacific Islander alone, non-Hispanic	0.0%	0.0%
Hispanic, any race	55.6%	15.0%
Other (including multiple races, non-Hispanic)	0.0%	2.9%
Balance of County		
White alone, non-Hispanic	79.2%	85.2%
Black or African-American alone, non-Hispanic	4.8%	7.2%
Asian alone, non-Hispanic	4.4%	2.7%
American Indian or Alaska Native alone, non-Hispanic	0.5%	0.4%
Pacific Islander alone, non-Hispanic	0.5%	0.0%
Hispanic, any race	10.1%	3.3%
Other (including multiple races, non-Hispanic)	0.5%	1.2%

Table 70: Severe Housing Problems (50% - 80% AMI)

	Has Severe Housing Problems	Has No Severe Housing Problems
Kent County		
White alone, non-Hispanic	62.8%	81.4%
Black or African-American alone, non-Hispanic	15.2%	8.1%
Asian alone, non-Hispanic	5.9%	2.8%
American Indian or Alaska Native alone, non- Hispanic	0.0%	0.1%
Pacific Islander alone, non-Hispanic	0.0%	0.02%
Hispanic, any race	12.3%	6.1%
Other (including multiple races, non-Hispanic)	3.9%	1.5%
Grand Rapids		
White alone, non-Hispanic	27.2%	73.6%
Black or African-American alone, non-Hispanic	38.3%	15.0%
Asian alone, non-Hispanic	6.2%	1.7%
American Indian or Alaska Native alone, non- Hispanic	0.0%	0.2%
Pacific Islander alone, non-Hispanic	0.0%	0.1%
Hispanic, any race	18.5%	8.6%
Other (including multiple races, non-Hispanic)	9.9%	0.9%
Wyoming		
White alone, non-Hispanic	62.5%	73.8%
Black or African-American alone, non-Hispanic	0.0%	9.5%
Asian alone, non-Hispanic	12.5%	6.8%
American Indian or Alaska Native alone, non- Hispanic	0.0%	0.4%
Pacific Islander alone, non-Hispanic	0.0%	0.0%
Hispanic, any race	25.0%	7.1%
Other (including multiple races, non-Hispanic)	0.0%	2.4%
Balance of County		
White alone, non-Hispanic	89.7%	87.5%
Black or African-American alone, non-Hispanic	0.0%	4.0%
Asian alone, non-Hispanic	4.7%	2.5%
American Indian or Alaska Native alone, non- Hispanic	0.0%	0.0%
Pacific Islander alone, non-Hispanic	0.0%	0.0%
Hispanic, any race	5.6%	4.5%
Other (including multiple races, non-Hispanic)	0.0%	1.6%

Table 71: Severe Housing Problems (80% - 100% AMI)

Based on the tables above, the following disproportionate severe housing needs were identified:

0 – 30% AMI:

- Black households in each jurisdiction
- Hispanic households in Wyoming

30% - 50% AMI:

- Black households in Grand Rapids
- Hispanic households in Wyoming

50% - 80% AMI:

• Hispanic households in Wyoming

80% - 100% AMI:

- Black households in Grand Rapids
- Asian and Hispanic households in Wyoming

Over this next five years Kent County and Grand Rapids, along with their housing partners will work toward addressing these disproportionate needs of low and moderate-income households.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

This section looks at the disproportionately greater need as it is related to housing cost burdens. Black households in Grand Rapids and Wyoming with a cost burden greater than 50% have a disproportionately greater need. While black households are 18.2% of the Grand Rapids population, Table 73 shows 32.1% of black households have a cost burden greater than 50%.

Table 72: Percent of Households by Race

	Kent County	Grand Rapids	Wyoming	Balance of County
White alone, non-Hispanic	80.2%	68.2%	72.8%	88.3%
Black or African-American alone, non-Hispanic	9.0%	18.2%	7.3%	4.4%
American Indian or Alaska Native alone, non- Hispanic	0.3%	0.3%	0.5%	0.2%
Asian alone, non-Hispanic	2.3%	1.7%	2.6%	2.5%
Pacific Islander alone, non-Hispanic	0.02%	0.01%	0.1%	0.01%
Other (including multiple races, non-Hispanic)	1.5%	1.7%	2.7%	1.2%
Hispanic, any race	6.7%	9.8%	14.0%	3.5%
Total	100%	100%	100%	100%
Source: 2013 - 2017 CHAS				

	< 30%	30-50%	> 50%	Not computed	Total
Grand Rapids					
White alone, non-Hispanic	75.4%	56.8%	52.7%	44.4%	68.2%
Black or African-American alone, non-Hispanic	12.4%	25.8%	32.1%	36.0%	18.2%
Asian alone, non-Hispanic	1.4%	2.9%	1.8%	1.1%	1.7%
American Indian or Alaska Native alone, non- Hispanic	0.3%	0.4%	0.4%	0.0%	0.3%
Pacific Islander alone, non-Hispanic	0.01%	0.0%	0.0%	0.0%	0.01%
Hispanic, any race	9.0%	12.1%	10.6%	14.8%	9.8%
other (including multiple races, non-Hispanic)	1.3%	2.1%	2.5%	3.7%	1.8%
Wyoming					
White alone, non-Hispanic	77.5%	65.5%	52.5%	64.1%	72.7%
Black or African-American alone, non-Hispanic	5.4%	9.4%	17.8%	0.0%	7.4%
Asian alone, non-Hispanic	2.5%	3.9%	0.5%	15.4%	2.6%
American Indian or Alaska Native alone, non- Hispanic	0.6%	0.2%	0.1%	0.0%	0.5%
Pacific Islander alone, non-Hispanic	0.0%	0.0%	1.1%	0.0%	0.1%
Hispanic, any race	11.7%	18.2%	22.5%	12.8%	14.0%
Other (including multiple races, non-Hispanic)	2.3%	2.9%	5.5%	7.7%	2.8%
Balance of County					
White alone, non-Hispanic	90.1%	83.1%	78.8%	93.0%	88.4%
Black or African-American alone, non-Hispanic	3.1%	8.2%	11.5%	2.5%	4.4%
Asian alone, non-Hispanic	2.6%	1.7%	2.6%	0.0%	2.5%
American Indian or Alaska Native alone, non- Hispanic	0.1%	0.4%	0.5%	0.0%	0.2%
Pacific Islander alone, non-Hispanic	0.0%	0.0%	0.1%	0.0%	0.01%
Hispanic, any race	3.1%	5.0%	4.3%	3.8%	3.5%
Other (including multiple races, non-Hispanic) ource: 2013 – 2017 CHAS	1.0%	1.5%	2.3%	0.6%	1.2%

Table 73: Housing Cost Burden

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The housing needs analysis indicates that, in general, very low-income Black and Hispanic households experience disproportionate housing needs across most jurisdictions. The following disproportionate needs were identified by income categories:

0 – 30% AMI:

- Black households in each jurisdiction
- Hispanic households in Wyoming

30% - 50% AMI:

- Black households in Grand Rapids
- Hispanic households in Wyoming

50% - 80% AMI:

- No disproportionately greater need 80% 100% AMI:
 - Asian households in Wyoming

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The red outlines in Figure 12 show areas of racially/ethnically concentrated areas of poverty.

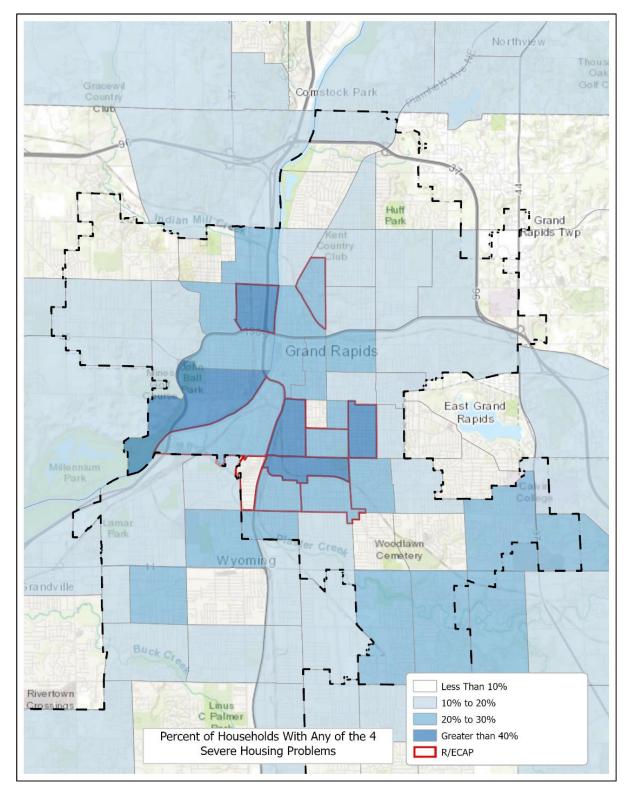


Figure 12: Percent of Households with Severe Housing Problems & Racially/Ethnically Concentrated Areas of Poverty

NA-35 Public Housing – 91.205(b)

Introduction

Four public housing authorities serve residents in Kent County: Kent County Housing Commission, Grand Rapids Housing Commission, Rockford Housing Commission and Wyoming Housing Commission. Together, they serve over 10,000 households through public housing and housing voucher programs. Housing voucher programs are classified into two types: project-based and tenant-based vouchers. Project-based vouchers are tied to a particular housing development or unit. Tenant-based vouchers are issued to individual households and can be used anywhere that accepts vouchers. Tenant-based vouchers offer families and individuals greater opportunities to find housing that meets their needs in Kent County.

No new public housing has been constructed since the Quality Housing and Work Responsibility Act was passed in 1998. Instead, housing for very low-income residents has been developed through other initiatives such as expanding the Section 8 programs. In 2012, the Rental Assistance Demonstration (RAD) program was initiated to allow public housing agencies to convert their public housing inventory to project-based voucher units. The RAD conversion program benefits both the public housing authority and the residents in two main ways. The public housing authority benefits from a more predictable and stable income stream since the units are under a long-term Section 8 contract, and not subject to fluctuations in operating income based on HUD's annual budget. Secondly, the properties are able to function similar to private-sector apartments by taking on debt to finance repairs and upgrades. Residents benefit because the housing authority is able maintain and improve the units in a more consistent manner. As a result of this program, the number of traditional public housing units in Kent County has declined to 477, while the number of housing vouchers has increased.

High quality public and subsidized housing in a community is important because the needs of the residents who live in public and subsidized housing can be greater than the average needs of the overall population. The average income of households in traditional public housing is \$13,279. The average income of households in project-based voucher developments is \$13,555, and \$14,163 for households with a tenant-based voucher. The tables below outline the profile of public housing residents in Kent County.

						Vouchers		
						Specia	al Purpose Vou	cher
	Mod- Rehab	Public Housing	Total	Project -based	Tenant -based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled
Grand Rapids	127	230	6,241	1,622	4,619	22	0	1,680
Rockford		52	213	192	22			
Wyoming		195	1,048	190	858			
Balance of County			2,315	982	1,333	174		
Total		477	9,817	2,986	6,832	196		

Table 74: HUD Assisted Housing

Source: Public Housing Information Center 2020

			hers					
	Mod	Dublic				•	Purpose cher	
					Project -based	Tenant -based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	\$7 <i>,</i> 985	\$13,279		\$13,555	\$14,163	0	0	
Average length of stay (months)	76	83	82	80	83	0	0	
Average Household size	1.2	1.6		1.6	2.4	0	0	
# Homeless at admission	8	0	59	2	57	0	0	
# of Elderly Program Participants (>62)	9	45	486	210	274	0	0	
# of Disabled Families						0	0	
<pre># of Families requesting accessibility features</pre>	97	378	2,979	405	2,547	0	0	
<pre># of HIV/AIDS program participants</pre>	0	0	0	0	0	0	0	
# of DV victims	0	0	0	0	0	0	0	

 Table 75: Characteristics of Public Housing Residents by Program Type

Source: Public Housing Information Center 2020

Table 76: Race/Ethnicity of Public Housing Residents by Program Type

							Vouchers		
							Specia	l Purpose Vou	cher
Race	Certificate	Mod- Rehab	Public Housing	Total	Project -based	Tenant -based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled
White	0	63%	41%		51%	25%	0	0	0
Black/African American	0	27%	47%		32%	66%	0	0	0
Asian	0	2%	0%		2%	0%	0	0	0
American Indian/Alaska Native	0	1%	1%		1%	0%	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	
Hispanic	0	2%	11%		9%	8%	0	0	0
Not Hispanic	0	95%	89%		91%	92%	0	0	0

Source: Public Housing Information Center 2020

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Waiting list times for residents who seek assistance are dreadfully long. The average wait list time for public housing is nearly 17 months, and over two years for Housing Choice Voucher applicants. Of those, nearly 80% of all households have a disability and need some form of accessible housing. As the market study indicates, there is a sizable and growing number of residents who report a disability, across all income spectrums.

Most immediate needs of residents of Public Housing and Housing Choice Voucher holders

The most immediate needs of residents of public housing and Housing Choice Vouchers (HCV) are additional housing choices and landlords willing to take HCV. There is a need for additional accessible units and 2-bedroom units. Sixteen percent (16%) of the households with HCV's are over-housed, meaning they live in housing with more bedrooms than necessary.

Services for disabled public housing residents and those with an HCV are also needed. Twenty-five percent (25%) of all households with HCV's have a member with a disability, and eighty percent (80%) of elderly households have a disability.

Supporting very low-income residents is a high need. Ninety-five percent (95%) of households are very low income and the average household income is 23% AMI. The PHA's have expanded their Family Self Sufficiency programs when funding is available to support low-income residents.

How do these needs compare to the housing needs of the population at large?

Public Housing and HCV households earn significantly less than the population at large, and therefore their housing needs tend to be greater. Because of their limited income, their mobility options are limited. Additionally, the rate of disability within the households is significantly higher than the population at large, particularly among public housing residents.

Discussion

The four public housing authorities serve over 10,000 households through public housing units owned and managed by the authorities, and through the Housing Choice Voucher programs. As discussed earlier, the shift away from traditional public housing to project-based vouchers benefits both the public housing authorities and the residents. The housing developments have more predictable and stable cash flow and operate more like privately owned housing. The residents benefit because the public housing authorities are able to meet the repair and upgrade needs of the housing units because their cash flow is more stable and predictable.

Families and individuals receiving housing vouchers are lower income than the population as a whole, have higher instances of disabilities within the household, and are more likely to suffer a housing crisis if they lose their housing voucher. These residents are some of the most vulnerable and in the most need for decent affordable housing.

The need for additional housing vouchers and increased value of the vouchers cannot be overstated, especially tenant-based vouchers. This issue was raised in the affordable housing focus groups and by Continuum of Care members. This need is evidenced by an exceptionally long waiting time of over two years to obtain a voucher. A significant challenge faced by voucher holders is the ability to find housing where the cost of rent is equal to or less than the value of the voucher. In 2018, the HUD fair market rent for a two-bedroom unit was \$878 per month. According to the 2014-2018 ACS, the median gross

rent for two-bedroom apartment was \$890/month in Kent County. A voucher holder either needs to find a unit costing less than the voucher value or make up the difference. An additional challenge is that the HUD fair market rents have not kept pace with increasing rent costs.

According to Zillow Research, the mean rent in the Grand Rapids / Wyoming MSA has increased 9% between 2018 and 2020, yet the HUD fair market rent only increased 7% over that same time period. The diverging difference between the actual market rent and the HUD fair market rent creates two challenges for low-income residents. First, fewer landlords may participate in the program if they can charge more rent on the open market versus accepting the HUD fair market rent. This may ultimately reduce the number of apartments available to voucher holders. Secondly, the public housing authority has the flexibility to pay more than HUD fair market rents, but that reduces the total number of available vouchers, and the number of households that can be served.

NA-40 Homeless Needs Assessment – 91.205C

Introduction

The Grand Rapids Area Coalition to End Homelessness is a community collaborative actively working on systems change to end homelessness. The goal of the Coalition is to prevent and end systemic homelessness in Kent County, guided by the values and philosophy set forth in the original 10-year community-developed plan, the Vision to End Homelessness. The Grand Rapids Area Coalition to End Homelessness, also known as the Kent County Continuum of Care (CoC), is an independent, non-incorporated membership entity comprised of numerous organizations and individuals. It was formed in response to federal requirements in the McKinney-Vento Homeless Assistance Act of 1987 reauthorization in 1994 and amended in the Homeless Emergency Assistance and Rapid Transition (HEARTH) Act of 2009 for administration of U.S. Department of Housing and Urban Development (HUD) funding to address homelessness.

The Essential Needs Task Force (ENTF) is a broader community effort to coordinate the response to basic needs and strengthen communications across systems in Kent County. The ENTF functions with subcommittees that include Housing, Energy Efficiency, Economic & Workforce Development, Transportation, and Food & Nutrition. The Continuum of Care is the ENTF's Housing Subcommittee.

Governance decisions on behalf of the CoC are made by a Steering Council elected from the membership, in accordance with the CoC Governance charter. The Steering Council is comprised of up to 21 seats representing the broad interests of the Coalition. Of those 21 seats, two are held by homeless or formerly homeless individuals. The Steering Council must also represent organizations or programs serving homeless subpopulations including:

- Persons with substance abuse disorders
- Persons with HIV/AIDS
- Veterans
- Chronically homeless
- Families with children
- Unaccompanied youth
- Seriously mentally ill
- Formerly incarcerated
- Victims of domestic violence, sexual assault, and stalking

The major responsibilities of the CoC, according to its charter and to comply with HUD regulations are:

- 1. Convene regular meetings of the full membership, with published agendas, at least semiannually.
- 2. Issue a public invitation for new members within Kent County at least annually.
- 3. Adopt and follow a written process to select a board to act on behalf of the CoC (identified as the Steering Council for Continuum of Care) and review that process at least once every 5 years.
- 4. Appoint additional committees, subcommittees, or work groups comprised of provider representatives and community advocates; and action boards comprised of consumers, as needed.
- 5. Designate the Homeless Management Information System (HMIS) lead for the CoC.
- 6. In consultation with the collaborative applicant for HUD funds and the HMIS lead, develop, follow and update annually:
 - a. A governance charter

- b. A code of conduct and recusal process for the board, its chairperson and any person acting on behalf of the board
- 7. Establish and operate a centralized or coordinated entry system.
- 8. Develop a plan for a coordinated housing and service system that meets the needs of individuals, unaccompanied youth, and families experiencing homelessness.
- 9. Plan and conduct an annual Point-in-Time count of sheltered and unsheltered persons that meets HUD guidelines.
- 10. Establish performance targets appropriate for population and program type in consultation with recipients and sub-recipients.
- 11. Monitor recipient and sub-recipient performance and address concerns of poor performance.
- 12. Work with Emergency Solutions Grants recipients and Consolidated Plan jurisdictions within the geographic boundaries of the CoC to allocate, report and evaluate use of funds, and inform the plan.
- 13. In consultation with recipients of Emergency Solutions Grants program funds, establish and consistently follow written standards for providing CoC assistance with those funds.

Various subcommittees are responsible for guiding and implementing the overarching CoC policies. Annually the Continuum of Care applies to the HUD Continuum of Care (CoC) Program for funding to address homelessness. The CoC is committed to collaboration to accomplish its stated goals to end homelessness.

Coordinated Assessment and Referral System

HUD requires CoCs establish and operate a coordinated entry (CE) process. The CE process is an approach to coordination and management of a housing crisis response system's resources that allows users to make consistent decisions from available information to efficiently and effectively connect people to interventions that will rapidly end episodes of homelessness. In October 2020, the CoC adopted a new CE Policy and have begun implementing the new processes. Coordinated Entry (CE) helps people in Kent County, who are or are about to become homeless. This process treats homelessness like the crisis it is, and supports an equitable, efficient response to families and individuals experiencing homelessness. The response is focused on immediately helping persons secure a safe place to stay, while at the same time, partnering to find a permanent solution to the homeless episode. As persons experiencing a housing crisis complete the CE assessment, the following coordinated entry core components are completed to ensure appropriate referrals and resources are provided:

1. Access: Access points are the virtual or physical places where a person in need of assistance accesses the coordinated entry process.

2. Assessment/Prioritization of Risk: Coordinated Entry utilizes a standardized process to determine eligibility, as well as discern primary needs and their urgency. A face-to-face assessment is scheduled for those who are literally homeless (including attempting to flee or fleeing domestic violence), seeking shelter or, if prevention funding is available, for those that need prevention financial assistance (at imminent risk of homelessness- HUD Category 2.) A common assessment tool is administered at time of assessment, which identifies strengths, natural supports, and housing resources. CE ensures that consumers quickly receive access to the most appropriate resources and housing services available.

3. Referral: Households prioritized and matched to a permanent housing resource are referred for services to the appropriate project.

Figure 13: Coordinated Entry Process



The key components of the system are:

Access – Community Housing Connect is the designated access tool for families and individuals. The tool can be completed online, over the phone, or in-person. Common access points include the following, but are not limited to:

- 2-1-1
- The Housing Assessment Program
- Shelters
- Housing providers
- Community partner agencies
- Street outreach teams

Any agency interested in assisting with expanding access to our CE system can participate as an access point. Access points may assist consumers by providing a device to access an assessment tool online. They may also assist consumers in calling the Housing Assessment Program to walk through the tool over the telephone.

Assessment – A simple assessment allows for identification of those conditions that require immediate attention (those that pose the greatest danger or threat), while also supporting the development of a long-term housing plan. Upon review of available services and completion of the Coordinated Entry assessment, families and individuals have the option of scheduling an appointment with a Community Solutions Specialist.

Emergency and urgent concerns identified by the family or individual are prioritized first through the provision of housing and services. Fundamental needs and the overall health of the family is assessed and prioritized for non-urgent community-based services. Assessments are completed to identify the most vulnerable households based on the number of anticipated housing placements across all resources occurring within the next sixty (60) days.

Prioritization – Once an assessment is complete, the Coordinated Entry process moves on to determine the priority for housing and supportive services. The level of vulnerability and need is determined by analyzing the information obtained from the initial assessment as well as an ongoing evaluation of risk during the case management process.

Risk factors utilized for prioritization of housing services through Coordinated Entry are categorized as emergencies and urgent needs. Additional information obtained on semi-urgent and non-urgent chronic needs is utilized to make additional referrals to community partners. All families and individuals having

identified emergent or urgent needs are prioritized for services. In times of an emergency or disaster declaration prioritization standards may be adjusted accordingly and approved by the CE and Steering Committees. Emergency services are a critical crisis response resource, and access to such services are not prioritized.

Dynamic Prioritization is used to identify the person with the highest needs at that point in time in the prioritized group(s), determine if referral is appropriate based on household needs and preferences, and to consider their eligibility for the program(s).

- Housing placement occurs within 60 days or as quickly as possible.
- All available CoC resources are leveraged in the most flexible manner possible.
- Project is working towards and contributes to continuous improvement of system measurements.

Referral – Once the prioritization process results in a household being matched to an open permanent housing program, Coordinated Entry completes a referral to the appropriate service. One of the guiding principles of CE is consumer choice. Consumers can reject service strategies and housing options offered to them, without repercussion. Consumers are not steered toward any particular housing program, facility, or neighborhood, but are matched based on eligibility, prioritization, and consumer choice.

2020 Point In Time Counts

Based on the 2020 Point-in-Time (PIT) counts, the trends surrounding those who are experiencing homeless and chronic homelessness are headed in the wrong direction, particularly among those experiencing chronic homelessness. Over the past four years the number of chronic homelessness has increased from 63 persons in 2016, to 185 persons in 2020. This represents a 194% increase in those experiencing chronic homelessness. The total number of persons experiencing homelessness increased during that same period from 800 persons to 923 persons in 2020, a 15% increase.

The PIT data also suggests that homelessness is increasing among young people. The number of youth (18-24) increased 66% since 2016, and youth with children increased 70%. The only group that saw a decrease were veterans, whose population decreased 9% to 69 individuals experiencing homelessness in 2020.

The PIT count occurred before the COVID-19 pandemic impacted national and local economies. Therefore, the increasing number of homeless can largely be attributed to the declining amount of lowpriced and deeply subsidized housing in Kent County. The increasing rise of chronic homeless persons reflects the need for additional permanent supportive housing and rent subsidies.

Table 77 through

Table 79 illustrate the results of the 2020 Point in Time count.

		Sheltered	Unsheltered	Total	
Households without Children	Emergency	Transitional	Safe Haven		
Total Number of Households	419	48	0	83	550
Total Number of Persons (Adults)	420	53	0	85	558
Number of Young Adults (Age 18-24)	30	18	0	4	52
Number of Adults (Over Age 24)	390	35	0	81	506
Gender					
Female	119	15	0	21	155
Male	297	37	0	61	395
Transgender	4	0	0	0	4
Gender Non-Conforming (i.e. not exclusively male or female)	0	1	0	0	1
Client Doesn't Know / Client Refused	0	0	0	3	3
Ethnicity					
Non-Hispanic/Non-Latino	388	49	0	75	512
Hispanic/Latino	28	4	0	4	36
Client Doesn't Know / Client Refused	1	0	0	6	7
Missing / Non-HUD	3	0	0	0	3
Race					
White	197	27	0	52	276
Black or African American	194	23	0	22	239
Asian	2	1	0	0	3
American Indian or Alaska Native	5	0	0	5	10
Native Hawaiian or Other Pacific Islander	1	0	0	0	1
Multiple Races	17	2	0	3	22
Client Doesn't Know / Client Refused	2	0	0	3	5
Missing / Non-HUD	2	0	0	0	2
Chronically Homeless					

Table 77 Households without Children (2020 Point in Time Count)

	She	ltered	Unsheltered	Total
	Emergency	Transitional		
Total Number of Households	53	40	0	93
Total Number of Persons (Adults and Children)	219	126	0	345
Number of Children (Under Age 18)	138	81	0	219
Number of Young Adults (Age 18-24	16	15	0	31
Number of Adults (Over Age 24)	65	30	0	95
Gender (adults and children)				
Female	126	85	0	211
Male	93	41	0	134
Transgender	0	0	0	0
Gender Non-Conforming (i.e. not exclusively male or female)	0	0	0	0
Ethnicity (adults and children)				
Non-Hispanic/Non-Latino	210	105	0	315
Hispanic/Latino	9	20	0	29
Missing / Non-HUD	0	1	0	1
Race (adults and children)				
White	26	20	0	46
Black or African American	154	86	0	240
Asian	3	3	0	6
American Indian or Alaska Native	0	1	0	1
Native Hawaiian or Other Pacific Islander	0	1	0	1
Multiple Races	35	15	0	50
Client Doesn't Know / Client Refused	1	0	0	1
Missing / Non-HUD	0	0	0	0
Chronically Homeless				
Total Number of Households	5		0	5
Total Number of Persons	30		0	30

able 79 Homeless Households with C		ltered	Unsheltered	Total	
	Emergency	Transitional			
Total Number of Households	5	1	1	7	
Total Number of Children (Under 18)	5	1	1	7	
Gender					
Female	2	0	0	2	
Male	3	1	1	5	
Transgender	0	0	0	0	
Gender Non-Conforming (i.e. not exclusively male or female)	0	0	0	0	
Client Doesn't Know / Client Refused	0	0	0	0	
Missing / Non-HUD	0	0	0	0	
Ethnicity					
Non-Hispanic/Non-Latino	3	1	1	5	
Hispanic/Latino	2	0	0	2	
Client Doesn't Know / Client Refused	0	0	0	0	
Missing / Non-HUD	0	0	0	0	
Race					
White	2	0	1	3	
Black or African American	3	1	0	4	
Asian	0	0	0	0	
American Indian or Alaska Native	0	0	0	0	
Native Hawaiian or Other Pacific Islander	0	0	0	0	
Multiple Races	0	0	0	0	
Client Doesn't Know / Client Refused	0	0	0	0	
Missing / Non-HUD	0	0	0	0	
Chronically Homeless					
Total Number of Persons	0		1	1	

Table 79 Homeless Households with Children (2020 Point in Time Count)

As the tables above indicate, households without children (558 individuals) comprise the largest group of homeless households. Within this group, 71% were male and 28% were female. Ninety-one percent (91%) were over the age of 24, and only 9% were young adults. Of the adult homeless individuals, 49% were White and 43% were Black. Black residents experiencing homelessness were disproportionately represented within Grand Rapids and Kent County.

Of the 558 homeless individuals, 75% (420 individuals) were living in emergency shelters, 9% (53 individuals) were living in transitional housing, and 15% (85 individuals) were unsheltered. The number

of single persons living in emergency shelter is at a four-year high. Housing individuals in emergency shelters is significantly more expensive than permanent housing (with and without supportive services). Efforts must be made to add deeply subsidized units, or units dedicated to serving formerly homeless, to the overall housing inventory.

In addition to the Point in Time Counts, the Grand Rapids Coalition to End Homelessness has a robust data dashboard that tracks many system indicators by quarter. Figure 14 below shows the number of households experiencing homelessness rose steadily in 2019 but began to fall in 2020.

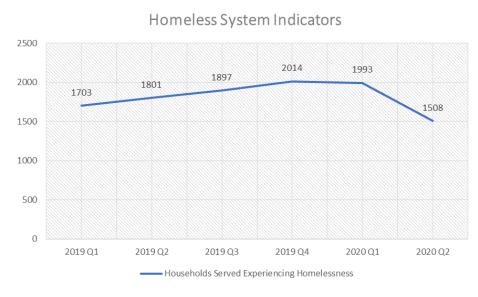
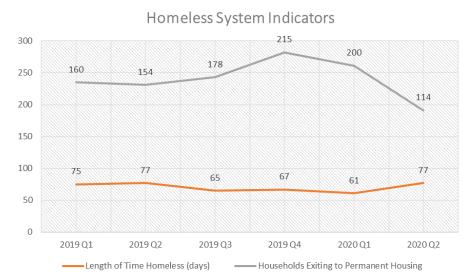
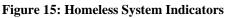


Figure 14: Households Served Experiencing Homelessness

Figure 15 illustrates the average length of time, in days, all households were served in emergency shelter, transitional housing, rapid re-housing, or prior to moving into permanent supportive housing.





The length of time has stayed relatively stable. The number of households exiting to permanent housing increased through 2019 but declined through the first two quarters of 2020. Based on focus group discussions, this is likely due to a lack of available permanent housing.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The number of homeless families in Kent County continues to rise. Over the past five years, the number of homeless families identified through the PIT ranged from a low of 73 in 2018 to 85 in 2019. The 2020 PIT identified 93 homeless families, a 9% increase. While the number of homeless families increased, the number of children within those families remained constant between 2019 and 2020. There were no unsheltered families counted in 2020. However, there were four unsheltered homeless youth under the age of 24.

There were 138 children under age 18 within the 53 households living in emergency shelters, the highest number recorded in the previous five-years. There is a large disparity between homeless females with children and homeless men with children. The 2020 PIT counted 240 homeless female headed households with children and 134 homeless male headed households.

Kent County has reached functional zero for homeless veterans, meaning the number who are homeless, whether unsheltered or sheltered, is no greater than the number that can be routinely housed in permanent housing. The number of homeless veterans has fluctuated over the past five years from a high of 92 in 2017 to a low of 56 in 2019. The 2020 PIT counted 72 homeless veterans, a 28% increase over the 2019 count. The 2020 PIT counted 65 sheltered veterans and 7 who were unsheltered. Ninety percent (90%) of the homeless veterans were male, including all unsheltered individuals. Seventy-two percent (72%) of homeless veterans were White, 24% were Black, and the other 4% were some other race. Only 3% of the homeless veterans were Hispanic.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Black individuals and families disproportionally experience homelessness in Kent County. Of the homeless single individuals (households without children) 49% are White and 43% are Black. The racial disparities among families are worse. Of the homeless families identified in the 2020 PIT, 70% were Black homeless families comparted to 13% that were White homeless families. There is substantial over representation of Black individuals in families within the shelter system, particularly the emergency shelters.

In regard to ethnicity, homeless individuals and families are more reflective of the overall population. Among households without children 6% are Hispanic/Latino. Among households with children, 8% are Hispanic/Latino.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

There were no unsheltered families observed in the 2020 PIT count. There were 85 unsheltered individuals within 83 households. Of the 85 unsheltered homeless, one was under age 18 and three were young adults (18-24). The gender ratios for sheltered and unsheltered individuals is nearly identical. Racially, there is a higher percentage of unsheltered White homeless compared to sheltered White homeless (61% versus 49%). As a percentage, the number of unsheltered Black homeless is nearly half of sheltered Black homeless (26% versus 43%). Of the 10 homeless individuals who are American Indian or Alaskan Native, 50% are living in unsheltered conditions.

Chronically homeless individuals comprise 51% of the unsheltered population.

Four subpopulations are tabulated through the Point in Time count:

- 1) Adults with a serious mental illness
- 2) Adults with a substance use disorder
- 3) Adults with HIV/AIDS
- 4) Victims of Domestic Violence

There were 117 adults with a serious mental illness. Ninety-five (81%) were sheltered and 22 (19%) were unsheltered. Of the total number of unsheltered homeless, 26% have a serious mental illness. There is a total of 60 homeless individuals with a substance use disorder. Of the total number of unsheltered homeless 18% have a substance use disorder. Seven (7) homeless individuals have HIV/AIDS, of which only one person is unsheltered. Lastly, 44 homeless individuals are victims of domestic violence, and only one victim is currently unsheltered.

Discussion:

While the CoC has officially adopted a Housing First framework, a 2015 evaluation report titled "Assessment of Grand Rapids and Kent County Vision to End Homelessness" indicated this approach was not fully embraced. A key outcome recommendation of the assessment was to continue to focus resources on housing-focused solutions, not emergency shelter beds. It appears this philosophy is slowly gaining traction. Based on the recent Housing Inventory Chart, of the 294 new beds brought online in 2019, or under construction in 2020, only 16 were emergency shelter beds. Kent County and Grand Rapids should continue to move investment away from emergency shelter programs and invest resources on housing-focused solutions.

In May 2018, concerned community stakeholders asked KConnect to bring people together to examine how the housing system is working, establish shared goals, and develop collaborative strategies to reach those goals with a focus on children, families, youth, and people of color. KConnect initiated its work in Fall 2018 and began a process to convene organizations, funders, and other stakeholders within the housing and homeless systems. This initiative was prompted by a recognition of existing racial inequities amongst those experiencing homelessness. As mentioned above, Black families are substantially overrepresented within the community's homelessness system data. Over the past two-years the Housing Stability Alliance studied these issues and released a plan entitled "Redefining the Path Home: System Building for Housing Stability in Kent County." The vision of the plan is to:

- 1) Increase access to quality affordable housing.
- 2) Dissolve homelessness in Kent County.
- 3) Focus on eliminating racial disparities among families, children and youth.
- 4) Address data-driven problems.

The plan's roadmap to achieve this vision includes five key elements:

- 1) **Equity and Community Engagement Plan**. The goal is to move those most affected by housing instability into decision-making power within the system.
- 2) **High-Leverage Activities**. The purpose of High-Leverage Activities is to maximize the efficiency and effectiveness of the resources, funding, relationships, and time available in order to produce the greatest results.
- 3) Shared Measurement System. A Shared Measurement System is largely defined by a community's ability to collect data and measure results using a common set of community and program-level Indicators. Shared Measurement Systems encourage organizations to align their

efforts on shared outcomes, enable them to collectively track and evaluate their collective progress, and offer them opportunities to benchmark their results.

- 4) **Continuous Communication Plan**. Continuous Communication is essential to keep internal and external stakeholders informed and excited about the work of the Housing Stability Alliance.
- 5) **Backbone Entity and Governance**. The Backbone entity fulfills several critical functions that are essential to facilitating collaborative, long-lasting system change. This includes guiding vision and strategy for the network, supporting aligned activities for maximum impact, cultivating community engagement, and mobilizing resources.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Describe the characteristics of special needs populations in your community:

Special needs populations include frail and non-frail elderly, persons with a physical disability, persons with HIV/AIDS and victims of domestic violence.

Elderly

There are nearly 70,000 households with at least one elderly resident in Kent County, with the majority of those households residing in the balance of the County (outside of Grand Rapids and Wyoming). Needs of the elderly include increased accessibility of housing, transportation services and in-home care as residents age.

	Grand Rapids	Wyoming	Balance of County
Household contains at			
least 1 person age 62-74	12,245	4,750	28,040
but no one age 75+			
Household contains at	7 605	2 220	14.386
least 1 person age 75+	7,695	2,229	14,560
Total	19,940	6,979	42,426

Table 80: Elderly – Kent County

Source: 2013-2017 CHAS

Frail Elderly

Frail elderly is defined as an elderly person who requires assistance with three or more activities of daily living, such as bathing, walking and performing light housework. The needs of the frail elderly include those of the elderly listed above in addition to other services such as in-home aids or living situations that provide medical support. Table 81 and Table 82 illustrate disability by age. Within Kent County, there are 16,245 residents over age 65 that have a self-care or independent living disability. An estimated 6,108 of those residents live in Grand Rapids and an estimated 1,701 live in Wyoming.

Disability

Physical disabilities include hearing, vision, cognitive, ambulatory, self-care, and independent living. As discussed previously, many disabled residents live in lower income households, limiting their ability to address the costs of daily life. There are an estimated 74,467 residents with a disability in Kent County, which is an overall disability rate of 11.8%. The instances of disability increase as the population ages. When examining disability by race and ethnicity in Kent County, minority residents have a higher rate of disabilities than White residents. While the overall population is relatively low, 23.6% of Native

Hawaiian/Pacific Islander and 17.7% of American Indian/Alaskan Native residents are disabled. Over 15% of Black residents are disabled in Kent County.

	Kent County						
	Under 5	5 - 17	18-34	35-64	65 and Over		
Disability Rate	0.5%	5.8%	7.0%	12.7%	34%		
Hearing	68	641	1,186	5,629	11,355		
Vision	165	1,142	1,689	4,877	3,801		
Cognitive		5,115	7,529	12,978	6,272		
Ambulatory		703	2,697	15,871	15,673		
Self-Care		1,088	1,418	6,042	5,279		
Independent Living			5,085	11,536	10,966		
Overall Disability Rate	11.8% (74,467 persons)						

Table 81: Kent County Disabled Population

Source: 2013-2017 ACS

There are an estimated 26,611 residents with a disability in Grand Rapids, which is an overall disability rate of 13.8% (higher than Kent County as a whole). The instances of disability increase as the population ages, and nearly 40% of residents over age 65 have a disability. Over 17% of Grand Rapids Black residents have a disability.

Table 82: Grand Rapids Disabled Population

	Grand Rapids					
	Under 5	5 - 17	18-34	35-64	65 and Over	
Disability Rate	1.3%	7.9%	8.0%	17.1%	39.7%	
Hearing	56	207	629	1,884	3,142	
Vision	137	621	788	1,882	1,357	
Cognitive		1,666	3,628	5 <i>,</i> 096	2,029	
Ambulatory		242	1,198	5 <i>,</i> 954	5,228	
Self-Care		301	532	2,514	2,114	
Independent Living			2,186	4,391	3,994	
Overall Disability Rate	13.8% (26,611 Persons)					

Source: 2013-2017 ACS

There are an estimated 10,105 residents with a disability in Wyoming, which is an overall disability rate of 13.5% (higher than Kent County overall). The instances of disability increase as the population ages, and nearly 35% of residents over age 65 have a disability. As discussed in the Housing Needs section, Asian households were disproportionately cost burdened. In the City of Wyoming, 14.7% of Asian residents are disabled, which is nearly double the rate of the County overall.

Table 83: Wyoming Disabled Population								
	Wyoming							
	Under 5	5 - 17	18-34	35-64	65 and Over			
Disability Rate	0.1%	6.7%	8.2%	17.7%	34.9%			
Hearing	0	87	137	722	1,080			
Vision	8	149	223	915	401			
Cognitive		771	1,067	2,129	652			
Ambulatory		120	490	2,698	1,762			
Self-Care		91	320	737	595			
Independent Living			819	1,883	1,106			
Overall Disability Rate	13.5% (10,105 persons)							
6								

Source: 2013-2017 ACS

Table 84 illustrates the disability rate by race and ethnicity.

Table 84: Percent Disabled by Race/Ethnicity

Kent County	Grand Rapids	Wyoming
% Disabled	% Disabled	% Disabled
11.5%	13.2%	13.8%
15.5%	17.3%	12.5%
17.7%	12.4%	15.0%
7.2%	5.8%	14.7%
23.6%	9.9%	0.0%
10.1%	10.5%	10.4%
12.6%	15.9%	13.0%
9.3%	10.2%	9.8%
	% Disabled 11.5% 15.5% 17.7% 7.2% 23.6% 10.1% 12.6%	% Disabled % Disabled 11.5% 13.2% 15.5% 17.3% 17.7% 12.4% 7.2% 5.8% 23.6% 9.9% 10.1% 10.5% 12.6% 15.9%

Source: 2013-2017 ACS

Domestic Violence

Victims of domestic violence, including dating violence, sexual assault, and stalking, are a special needs population. Because domestic violence is often unreported, it is difficult to track. The YWCA provides shelter and care for women and families affected by domestic and sexual violence. Between October 1, 2018 and September 30, 2019, the YWCA served 641 women and their children in emergency shelter and long-term supportive housing. During that same time period, the agency provided rape exams to 341 women, including 138 children.

What are the housing and supportive service needs of these populations and how are these needs determined?

During focus group discussions and in survey results, the housing and supportive service needs of these populations were similar to the needs of the low-income population as a whole. Transportation needs are a high priority as are accessibility modifications for those with mobility impairments. As the population ages, there will be greater demands for transportation services, in home care, and affordable congregate living facilities. Many of these populations live in low- and moderate-income households and issues of housing cost burden will continue to grow.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the Kent County Health Department, there are an estimated 1,110 people living with HIV.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Non-housing community development needs include public facilities, infrastructure, transportation, and public services. The needs were determined by reviewing existing plans and feedback from focus groups and resident surveys.

Describe the jurisdiction's need for Public Facilities and Improvements:

During the public engagement process the following public facility needs were identified as priorities:

- 1. Improvements to existing parks, open space, and recreation trails. The Grand Rapids Parks & Recreation Strategic Master Plan has a number of goals intended to strengthen the community:
 - Create a connected network of parks, natural areas, and waterways accessible to the entire Grand Rapids community.
 - Create programs and projects that support the physical, mental, and emotional wellbeing of community members.
 - Create diverse experiences by drawing on community feedback, local ecology, and national trends.
 - Seek innovative solutions to become more financially self-sustainable and diversify funding sources.
- 2. Street tree improvements. Grand Rapids Forestry Department has a goal of a 40% tree canopy. This aligns with community priorities related to the environment and neighborhood quality.
- 3. Accessibility improvements to public facilities. As the community ages, accessibility improvements will be necessary to ensure residents of all ages can access public facilities.

Describe the jurisdiction's need for Public Improvements:

- 1. Improved internet access. This was a key priority in the Community Needs Survey, likely driven by the recent shift to working and learning at home.
- 2. Street improvements (paving and traffic calming). Resident surveys indicated a high need. Additionally, the Grand Rapids Vital Streets Task Force identified a need of \$22 million per year over 15 years to repair streets. In 2014 the Vital Street fund was approved to meet these needs. The Goal is to have 70% of the streets in good or fair condition. Currently 61% are good or fair. The 2015 Kent County Road Commission noted a \$10 million investment in road improvements is needed.
- 3. Pedestrian accessibility improvements (curb ramps and sidewalks). Accessibility needs ranked high in the Community Needs Survey. The City of Grand Rapids has begun to accelerate ADA ramp installation as a response to this need. In 2018, 117 ramps were replaced.
- 4. Sidewalk improvements. The Vital Streets plan also noted a need for improved sidewalks and paths, with a goal of adding five additional miles by 2020.
- 5. Street lighting improvements. Residents indicated a need for improved street and alley lighting for enhanced safety.

Describe the jurisdiction's need for Public Services:

The public engagement process yielded the following public service priorities:

- Childcare. Childcare was identified as a barrier to employment by focus group participants, and the Community Needs Survey identified it as a high need.
- Medical and mental health services. The need for mental health services has increased across the country during the pandemic, and the need was also reflected in the Community Needs Survey.

- Homeless and housing crisis services. The 2015 Continuum of Care Action Plan to End Homelessness identified a series of needs including permanent housing resources, high performing programs, and the need to support and increase affordable housing.
- Emergency payment assistance for rent, utilities, and mortgages. This was rated a high need on the Community Needs Survey and has likely been heightened by the economic effects of the pandemic.
- Activities for youth. This was listed as a high need in the Community Needs Survey.

Other needs included:

- 1. Crime prevention activities. There has been a rise in gun violence throughout the nation during the COVID-19 pandemic, and Kent County is no exception. The Community Needs Survey and interviews with neighborhood leaders indicated crime prevention activities remain a need.
- Services for persons with disabilities. Nearly 50,000 households include at least one person with a disability. Increased service needs include in-home care, home modifications to remove barriers, transportation assistance and specialty healthcare. Service needs for persons with disabilities will likely increase as the population ages.
- Transportation assistance. Transportation assistance was identified as a need in the Kent County City, Villages and Township focus group, particularly for areas in northern Kent County. The need for connected and improved transportation services was also outlined in the Kent County Transit Needs Assessment undertaken by Grand Valley Metropolitan Council.

Housing Market Analysis

MA-05 Overview

Over the past 20 years, the Kent County region has added nearly 80,000 residents. While Grand Rapids lost population between 2000 and 2010, an estimated 15,000 residents have since moved to the City. Over the next five years, the regional population is expected to grow another 4.0% to approximately 680,000 residents.

Grand Rapids is estimated to grow to approximately 210,000 and the City of Wyoming to 81,000 residents. Figure 16 shows the areas projected to grow over the next five years. The population growth will put added pressure on an already tight housing market.

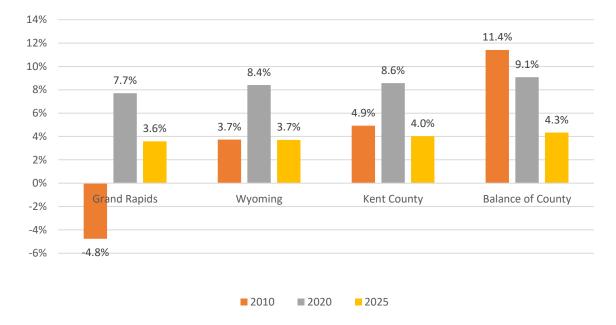


Figure 16: Regional Population Change 2000 - 2025

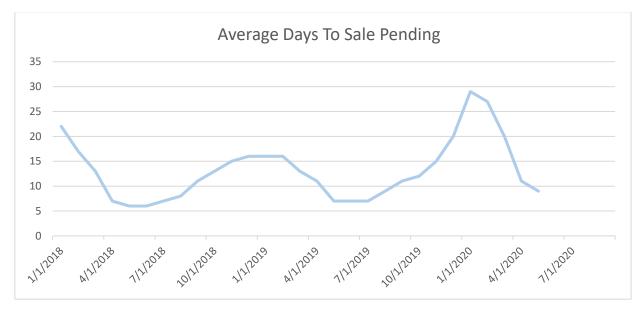
Source: ESRI Demographics

The tight housing market is evidenced by several factors. The homeowner market is evaluated based on factors such as the homeowner vacancy rate, average days to sale pending and average sale prices over time. Housing market analysts generall view a healthy for-sale market as one that has a homeowner vacancy rate of 1% - 3%. This level of vacancy provides available units for existing homeowners to prospective homeowners to find housing that fits the needs of their household.

According to the 2018 ACS, current homeowner vacancy rates are as follows: Kent County: 0.7% Grand Rapids: 1.4% Wyoming: 0.5%

Figure 17 illustrates the average days from list to sale pending for homes in the Kent County region, according to Zillow Research. While there was a temporary slowdown in the early months of 2020, likely due to COVID-19, the rate appears to have settled between five and ten days. This means, on

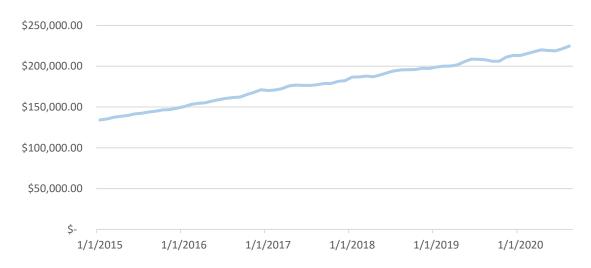
average, a home goes from listed to sale pending in less than two weeks. This makes searching for a home incredibly difficult and leaves little room for price negotiations.





Source: Zillow Market Research





Source: Zillow Market Research

The rental market is evaluated in a similar fashion including rental vacancy rate and average rental costs over time. Housing market analysts generally view a healthy rental housing market as having a rental vacancy rate range of 5% - 7%. These vacant units allow existing or relocating residents to readily find housing that is more suitable for their household needs, and accommodates new households forming in the community.

For rental units, the 2018 ACS estimate of rental vacancy rates was: Kent County: 3.6% Grand Rapids: 3.9%

Wyoming: 4.5%

These low rates can lead to an accelerated increase in monthly rent costs, which appears to be evident as illustrated on Figure 19 from Zillow Research.

Tight housing markets have a disproportionate effect on low-income households who do not have the financial ability to afford rent increases. They may be forced to move from their neighborhood or settle for a unit that does not fit their household needs (e.g. too few bedrooms, greater distance from their place of employment, or in a distressed condition).

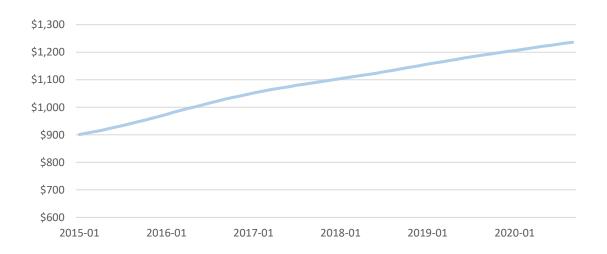


Figure 19: Grand Rapids MSA Average Monthly Rent

Source: Zillow Market Research

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

According to the 2014 – 2018 American Community Survey, there are 239,236 households in Kent County. The split between homeowner and renter households is illustrated in Figure 20.

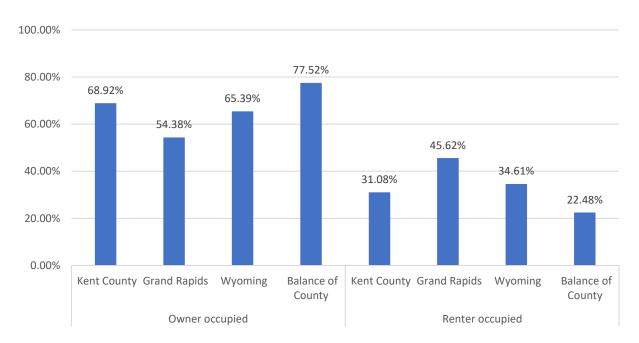


Figure 20: Owner and Renter Percentage by Community

Source: 2013-2017 ACS

The ownership versus rental household split is similar to most midwestern communities where the homeownership rate is higher the further distance from the central city. During the public engagement phase of the plan development, many Grand Rapids stakeholders expressed a desire to increase the homeownership rate within the city, especially among minority residents who were historically excluded from homeownership. Historically, homeownership has been the path towards generational wealth building; and increasing the minority homeownership rate is one strategy to reduce the wealth gap between White and Black households. In addition to increasing the homeownership rate, the community expressed the need for additional rental housing, particularly affordable rental housing. These needs will be met through a combination of new construction and renovation of existing properties.

Property Type

Figure 21 illustrates the distribution of property types within Kent County. Single-unit detached structures are the majority in all communities. The proportion of single-unit structures increases as one travels from the central city, with the highest concentration in the balance of Kent County. Grand Rapids has the largest proportion of smaller, 2-4 unit structures and large (20+ units) residential

buildings. The City of Wyoming has the largest share of mid-sized residential structures. The rural areas of Kent County have the largest proportion of mobile homes and other residential property types.

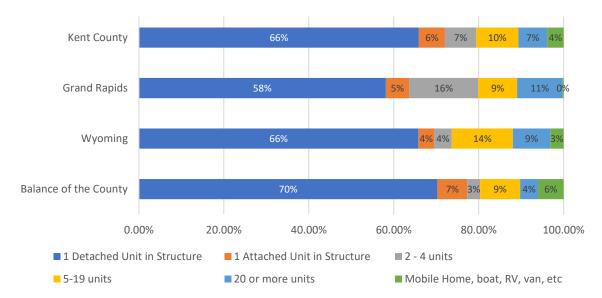


Figure 21: Property Type

Source: 2013-2017 CHAS

To meet the need for additional affordable housing, a mixture of property types will need to be constructed and must accommodate a variety of densities, household needs and desires, and keep development costs low.

Unit Size by Tenure

Figure 22 illustrates the unit size by tenure in Kent County. The number of bedrooms in a structure varies widely depending on whether it was built for homeowners or renters. Across all communities, over 75% of homeowners have three or more bedrooms. Only 20 percent of homeowners live in 2-bedroom homes, and less than 3 percent have one or fewer bedrooms. The limited supply of small units provides fewer options for small households if they want to own, but do not want or cannot afford a home with three or more bedrooms.

Among renter households, the unit size is more appropriately distributed. Approximately one third of all renter households live in a zero to one-bedroom rental unit. Approximately 40% live in a two-bedroom unit. However, unlike homeowners, three-bedroom units are only occupied by about one third of renter households. Since only one third of rental units are three or more bedrooms, large families may find it difficult to locate affordable rental housing that accommodates their family size. This lack of inventory can lead to overcrowding and increased cost.

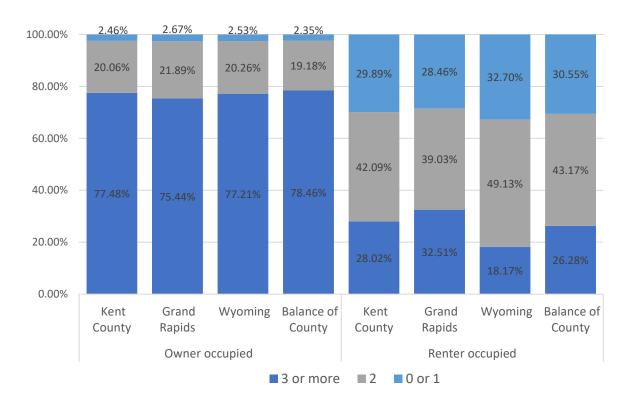


Figure 22: Unit Size by Tenure

Source: 2013-2017 CHAS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

This section largely addresses units directly assisted by HUD, either through the public housing agencies, or direct contracts with property owners. Assistance provided under HUD programs falls into three categories: 1) public housing, 2) tenant-based, and 3) privately owned, project-based assistance. Local and state assistance, such as HOME and the Low Income Housing Tax Credit (LIHTC) typically include direct HUD funding either through a Section 8 contract or a resident with a Housing Choice Voucher.

In public housing, local housing authorities receive allocations of HUD funding to build, operate, or make improvements to housing. The housing is owned by the local authorities. Public housing is a form of project-based subsidy because households may receive assistance only if they agree to live at a particular public housing development.

Currently, tenant-based assistance is the most prevalent form of housing assistance provided. Historically, tenant-based assistance began with the Section 8 certificate and voucher programs, which were created in 1974 and 1983, respectively. These programs were replaced by the Housing Choice Voucher (HCV) program, under legislation enacted in 1998. Tenant-based programs allow participants to find and lease housing in the private market. Local public housing authorities (PHAs) and some state agencies serving as PHAs enter into contracts with HUD to administer the programs. The PHAs then enter into contracts with private landlords. The housing must meet housing quality standards and other program requirements. The subsidies are used to supplement the rent paid by low-income households. Under tenant-based programs, assisted households may move and take their subsidy with them. The primary difference between certificates and vouchers is that under certificates, there was a maximum rent which the unit may not exceed. By contrast, vouchers have no specific maximum rent; the low-income household must pay any excess over the payment standard, an amount that is determined locally and that is based on the Fair Market Rent. HUD calculates the Fair Market Rent based on the 40th percentile of the gross rents paid by recent movers for non-luxury units meeting certain quality standards.

The third major type of HUD rental assistance is a collection of programs generally referred to as multifamily assisted, or privately-owned, project-based housing. These types of housing assistance fall under a collection of programs created during the last four decades. What these programs have in common is that they provide rental housing owned by private landlords who enter into contracts with HUD in order to receive housing subsidies. The subsidies pay the difference between tenant rent and total rental costs. The subsidy arrangement is termed project-based because the assisted household may not take the subsidy and move to another location. The single largest project-based program was the Section 8 program, which was created in 1974. This program allowed for new construction and substantial rehabilitation that was delivered through a wide variety of financing mechanisms. An important variant of project-based Section 8 was the Loan Management Set Aside (LMSA) program, which was provided in projects financed under Federal Housing Administration (FHA) programs that were not originally intended to provide deep subsidy rental assistance. Projects receiving these LMSA "piggyback" subsidies were developed under the Section 236 program, the Section 221(d)(3) Below Market Interest Rate (BMIR) program, and others that were unassisted when originally developed.

Based on data from the HUD Office of Policy Development and Research, there are 11,000 HUD subsidized units in Kent County. The breakdown of units by community is found in Table 85.

	202 (Elderly)	811 (Disabled)	Housing Choice Vouchers	Mod Rehab	Project Based Section 8	Public Housing	Total
Grand Rapids	81	23	4,808	102	1,726	201	6,941
Wyoming			867		190	195	1,252
Balance of County	225		1,359		1,171	52	2,807
Total	306	23	7,034	102	3,087	448	11,000

Table 85: HUD Subsidized Units in Kent County

Source: HUD PDR 2021

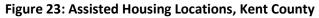
Table 86 summarizes a few characteristics of tenants currently residing in subsidized housing in the region. In all developments, at least 95% of the tenants are very low-income, most earning less than 25% of the Area Median Income. In Grand Rapids, 50% of Housing Choice Voucher residents are female head of household with children, 77% are minority and 8% are Hispanic. In Wyoming, 43% of Housing Choice Voucher residents are female head of household with children, 74% are minority and 15% are Hispanic. Throughout Kent County, 48% of Housing Choice Voucher residents are female head of household with children, 75% are minority and 8% are Hispanic.

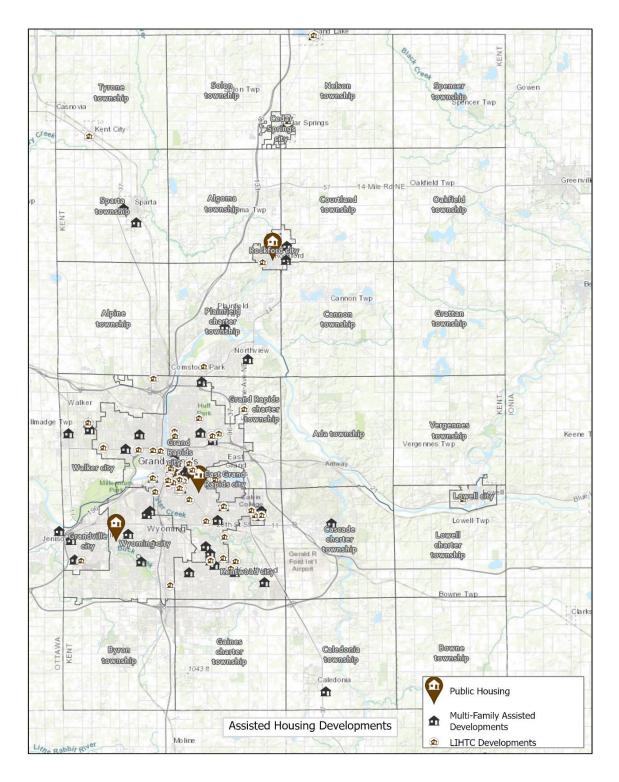
	202 (Elderly)	811 (Disabled)	Housing Choice Vouchers	Mod Rehab	Project Based Section 8	Public Housing
Grand Rapids						
% of AMI	21%	23%	22%	15%	23%	19%
% very low income	100%	96%	97%	99%	97%	99%
% female head with children			50%	8%	18%	4%
% with disability	0%	92%	23%	62%	22%	77%
% Age 62 or more	100%	14%	19%	20%	52%	19%
% Minority	48%	33%	77%	37%	53%	64%
% Hispanic	14%		8%	9%	10%	6%
Wyoming						
% of AMI			23%		23%	25%
% very low income			96%		98%	90%
% female head with children			43%		10%	47%
% with disability			31%		35%	30%
% Age 62 or more			21%		55%	20%
% Minority			74%		40%	71%
% Hispanic			15%		27%	19%
Kent County						
% of AMI	27%	23%	22%	14%	23%	22%
% very low income	99%	96%	96%	99%	97%	96%
% female head with children			48%	9%	21%%	23%
% with disability	3%	93%	25%%	62%	19%%	48%
% Age 62 or more	100%	12%	20%	20%	53%	28%
% Minority	18%	32%	75%	39%	44%	60%
% Hispanic	5%	0%	8%	9%	10%	12%

Table 86: Selected Tenant Characteristics of HUD Subsidized Units

Source: HUD PDR 2021

In addition to the public housing programs discussed above, a significant number of affordable housing units are created through state and local funding initiatives such as tax-exempt bonds, Low-Income Housing Tax Credits, and HOME Investment Partnerships program funding. Figure 23 and Figure 24 show the locations of various assisted housing developments. The complete list of assisted developments in Kent County can be found in Appendix C.





Source: HUD eGIS

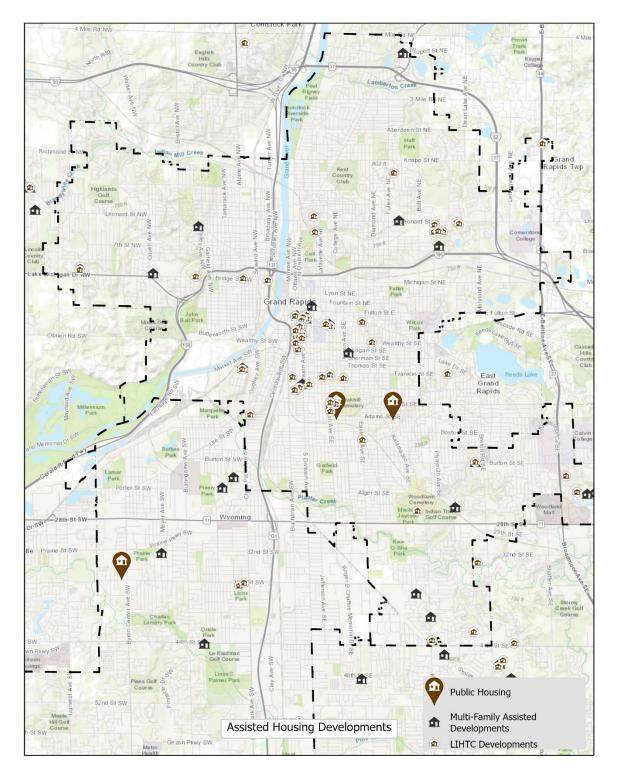


Figure 24: Assisted Housing Locations, Grand Rapids

Source: HUD eGIS

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

By 2025, there will be 955 subsidized units at risk of being lost from the affordable housing inventory due to expiring Section 8 contract. This includes 245 units dedicated to seniors and those residents with disabilities. The remaining units are targeted to families. The jurisdictions should work with the owners and managers of those properties with expiring Section 8 contracts to renew their contracts, so the units stay in the affordable housing inventory.

Does the availability of housing units meet the needs of the population?

By 2025, it is estimated that Kent County will grow to 680,000 residents in 256,802 households. There are currently 239,236 occupied housing units. Over the next five years, there is an anticipated need to house an additional 17,500 households within the county. These additional units will need to be brought online through a combination of new construction and rehabilitation of existing vacant units. However, this is necessary to just meet existing population projections. To loosen the housing market and take pressure from escalating housing cost, an additional number of housing units will need to be constructed, beyond those necessary to accommodate the growth in households.

Describe the need for specific types of housing

There is a shortage of housing that is affordable to many households in Kent County. The affordability gap is the difference between occupied housing units that are affordable and available based on household income. The next three tables examine the rental affordability gap by comparing the estimated cost of housing versus the household income. The row totals are the number of occupied rental housing units affordable to households within that income range. The column totals are the number of households in each income category.

Table 87 compares the rental affordability gap for the Balance of the County. The first column indicates there are 5,255 renter households earning less than 30% AMI. The first row indicates there are a total of 3,242 occupied rental housing units affordable to households earning less than 30% AMI. Therefore, there is a gap of at least 2,013 units (3,242 – 5,255) affordable to those earning less than 30% AMI. Over 2,000 new rental units would need to be constructed to help fill that gap.

The availability to find suitable housing is also impacted by the "step-down" effect. This phenomenon is categorized by households who are living in housing units that cost less than their income would suggest they can afford. The first row of

Table 87 shows that 510 renter households earning more than 100% AMI live in rental housing affordable to those earning less than 30% AMI. In the Balance of the County, there are an estimated 1,817 renter households earning more than 30% AMI but residing in rental housing affordable for those who make less than 30% AMI, further exasperating the housing challenges of extremely low-income households. There is also an availability gap of housing available for those earning more than 80% AMI. Since those households are living in step-down units, additional housing targeted to middle- and upper-income households may free up more affordable units.

/ / I		1					
	Household Income						
Rental units affordable to	< 30%	30-50%	50-80%	80-100%	> 100%	Occupied	
households earning:	AMI	AMI	AMI	AMI	of AMI	Rental Units	
Less than 30% AMI	1,425	657	485	165	510	3,242	
30% - 50% AMI	1,780	2,350	2,751	990	1,200	9,071	
50% - 80% AMI	1,815	2,435	3,840	2,610	4,701	15,401	
Greater than 80% AMI	235	251	429	240	1,620	2,775	
Total Renter Households	5,255	5,693	7,505	4,005	8,031	30,489	
Source: 2012 2017 CHAS							

Table 87: Rental Affordability Gap - Balance of County

Source: 2013 – 2017 CHAS

Table 88 illustrates the rental affordability gap for Grand Rapids. There is a net rental availability gap of 5,791 units (9,945-4,154) for households earning less than 30% AMI. Additionally, there are 1,789 "step-down" renter households living in housing that is affordable to those earning less than 30% AMI. There is also a gap in housing for households earning more than 80% AMI. Those households are currently living in step-down units, and additional housing targeted for middle- or upper-income households may free up lower priced housing units.

Table 88: Rental Affordability Gap – Grand Rapids

	Household Income							
Rental units affordable to	< 30%	30-50%	50-80%	80-100%	> 100%	Occupied		
households earning:	AMI	AMI	AMI	AMI	AMI	Rental Units		
Less than 30% AMI	2,365	834	610	140	205	4,154		
30% - 50% AMI	3,370	2,575	2,249	780	1,010	9,984		
50% - 80% AMI	3,580	3,365	3,095	2,275	3,814	16,129		
Greater than 80% AMI	630	430	445	180	1,535	3,220		
Total Renter Households	9,945	7,204	6,399	3,375	6,564	33,487		

Source: 2013 – 2017 CHAS

Table 89 illustrates the rental affordability gap for Wyoming. There is a net availability gap of 1,526 rental units (2,300-774) for households earning less than 30% AMI. Additionally, there are 414 step-down households living in housing that is affordable to those earning less than 30% AMI.

Table 89: Rental Affordability Gap - Wyoming

	Household Income							
Rental units affordable to	< 30%	30-50%	50-80%	80-100%	> 100%	Occupied		
households earning:	AMI	AMI	AMI	AMI	of AMI	Rental Units		
Less than 30% AMI	360	129	160	65	60	774		
30% - 50% AMI	1,075	800	870	165	350	3,260		
50% - 80% AMI	775	805	1,640	615	1,445	5,280		
Greater than 80% AMI	90	89	30	45	85	339		
Total Renter Households	2,300	1,823	2,700	890	1,940	9,653		
Sourco: 2012 2017 CHAS								

Source: 2013 – 2017 CHAS

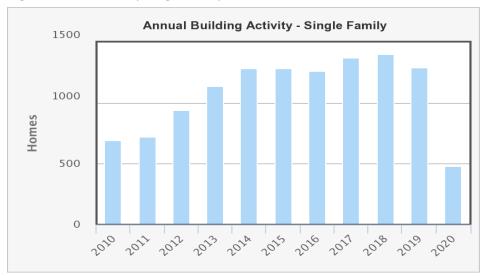
Trufant Gowen Spencer Twp Cedar Springs cree A nch Croc NE Oakfield Twp Chester Twp Cannon Twp Twp Northview mstock Ц Vergennes Twp Grand R. pids Rapio Lowe Lowell Twp eorgetown Twp minda-Grandv Gerald R Ford Int'l Airport Kentwood Bowne_Twp 1043 ft Less than 5% Percent of Rental Units Affordable to 5% - 15% Households Under 30% AMI 15% - 30% over 30%

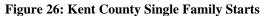
Figure 25 illustrates the location of affordable rental units available to households in Kent County.

Figure 25: Percent Rental Units Affordable to Households Under 30% AMI Source: 2013-2017 CHAS

Discussion

The Kent County region continues to grow, and additional housing units will need to be brought online to accommodate that household growth. As Figure 26 and Figure 27 illustrate, there has been continuous construction over the past five years. Since 2015, over 7,000 single-family homes and over 5,784 multi-family units have been or are under construction.





Source: HUD Office of Policy Development and Research

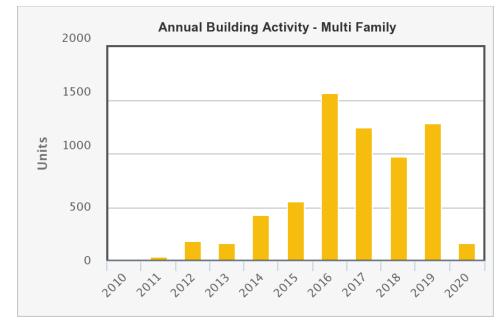


Figure 27: Kent County Multi-Family Starts

Source: HUD Office of Policy Development and Research

These additional units will help loosen the housing market and dampen the rent and home price escalation pressures. However, a conscious effort must be made to address the affordability gap between rents and income. Based on the 2013-2017 CHAS data, the rental availability gap for households earning less than 30% AMI in Kent County is significant:

- 3,242 rental units in the Balance of the County
- 5,791 rental units in Grand Rapids
- 1,526 rental units in Wyoming

The tables above illustrate the affordability gap in rental housing units, but there is a significant gap in the for-sale market as well, which will be discussed later.

The construction of units that target rental households earning less than 30% are critically important. These residents are the most likely to suffer a housing crisis and potentially end up experiencing homelessness.

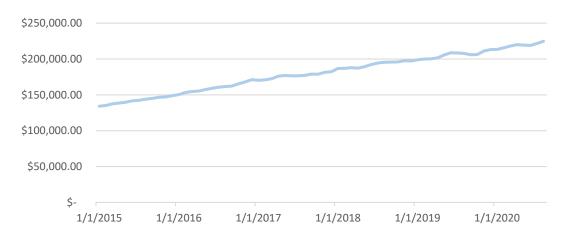
Additionally, efforts will need to be undertaken over the next five years to ensure the currently subsidized units whose Section 8 contract may expire are renewed.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Housing costs for rental and for-sale units continue to escalate in the region. Figure 28 illustrates the five-year trend of median sales price in the Grand Rapids MSA. Figure 29 illustrates the average monthly rent within the Grand Rapids MSA of non-subsidized rental units.





Source: Zillow Market Research

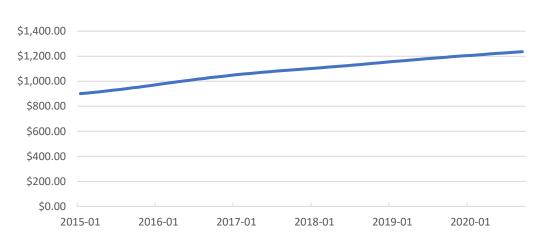


Figure 29: Grand Rapids MSA Average Monthly Rent

Source: Zillow Market Research

Focus group participants and survey respondents indicated the rising housing costs in Grand Rapids and Kent County overall is a significant concern for residents.

Cost of Housing

Between 2013 and 2018, median home values in Grand Rapids increased 20.4%, in Wyoming by 12.2% and Kent County overall by 18.9%

During that same period, median contract rent increased by 18.1% in Grand Rapids, 16.5% in Wyoming, and 16.9% in Kent County.

Table 90:	Median	Home	Value	bv	Community
1 4010 201	1, 10 and 11	110mic	, and	~ 5	Community

			Media	n Home Value				
	Kent (County	Grand F	Rapids	Wyon	Wyoming		
Year		% Change		% Change		% Change		
2013	\$137,500		\$109,400		\$103,500			
2018	\$163 <i>,</i> 500	18.9%	\$131,700	20.4%	\$ 116,100	12.2%		
-								

Source: 2009-2013 ACS, ESRI Demographics

Table 91: Median Contract Rent

		Median C	ontract Rent		
Kent Co	ounty	Grand Rap	ids	Wyomir	ng
0	% Change		% Change		% Change
\$745		\$758		\$714	
\$871	16.9%	\$895	18.1%	\$832	16.5%
	۶ \$745		Kent County Grand Rap % Change \$745 \$758	% Change% Change\$745\$758	Kent CountyGrand RapidsWyomin% Change% Change\$745\$758\$714

Source: 2009 – 2013 ACS, ESRI Demographics

For all communities, the largest share of rent paid is in the \$500 - \$900 per month range. Nearly 60% of all units in Kent County fall into this range. In Grand Rapids, the share is slightly lower at 53.2%, and Wyoming is much higher at 68.2%.

	Kent County		Grand Rapids		Wyoming		Balance of County	
Rent Paid	Units	%	Units	%	Units	%	Units	%
Less than \$500	5,818	8.2%	3,434	10.4%	412	4.4%	1,972	6.8%
\$500-999	42,192	59.3%	17,571	53.2%	6,337	68.2%	18,284	63.4%
\$1,000-1,499	17,644	24.8%	8,839	26.8%	2,332	25.1%	6,473	22.4%
\$1,500-1,999	4,113	5.8%	2,274	6.9%	177	1.9%	1,662	5.8%
\$2,000 or more	1,379	1.9%	884	2.7%	39	0.4%	456	1.6%
Total	71,146	100.0%	33,002	100.0%	9,297	100.0%	28,847	100%

Table 92: Rent Paid by Community

Source: ESRI Demographics

Housing Affordability

Housing affordability is measured by comparing the cost of housing (rent or home value) to the income of residents. Housing is affordable if the cost does not exceed 30% of a household's total income. The CHAS estimates the number of affordable housing units, both rental and ownership, that are affordable to households by income. This data is used to estimate the gap or surplus of housing based on cost and

the income of residents. There is a gap of affordable housing if there are more households in given income category than there are units affordable to those households. These gaps allow communities to understand the income targeting necessary to help solve those housing challenges.

The tables below illustrate the number of units by tenure that are considered affordable.

Table 93: Renter Occupied Affordability – Balance of County

Units affordable to households that earn:	< 30% AMI	30-50% of AMI	50-80% of AMI	80-100% AMI	> 100% of AMI	Total Renter Units
Less than 30% AMI	1,425	657	485	165	510	3,242
30% - 50% AMI	1,780	2,350	2,751	990	1,200	9,071
50% - 80% AMI	1,815	2,435	3,840	2,610	4,701	15,401
Greater than 80% AMI	235	251	429	240	1,620	2775
Total Renter Households	5,255	5,693	7,505	4,005	8,031	30,489
Courses 2012 2017 CUAC						

Source: 2013 – 2017 CHAS

Table 94: Owner Occupied Affordability – Balance of County

Units affordable to households that earn:	< 30% AMI	30-50% of AMI	50- 80% of AMI	80-100% AMI	> 100% of AMI	Total Owner Units
Less than 50% AMI	2,271	3,587	6,005	3,805	10,471	26,139
50% - 80% AMI	1,536	2,050	5,224	4,073	23,570	36,453
80% - 100% AMI	320	545	1,415	1,370	11,885	15,535
Greater than 100% AMI	625	871	1,770	1,679	22,100	27,045
Total Owner Households	4,752	7,053	14,414	10,927	68,026	105,172
Courses 2012 2017 CUAC						

Source: 2013 – 2017 CHAS

Table 95: Renter Occupied Affordability – Grand Rapids

Units affordable to households that earn:	< 30% AMI	30-50% of AMI	50-80% of AMI	80-100% AMI	> 100% of AMI	Total Rental Units
Less than 30% AMI	2,365	834	610	140	205	4,154
30% - 50% AMI	3,370	2,575	2,249	780	1,010	9,984
50% - 80% AMI	3,580	3,365	3,095	2,275	3,814	16,129
Greater than 80% AMI	630	430	445	180	1,535	3,220
Total Renter Households	9,945	7,204	6,399	3,375	6,564	33,487

Source: 2013 - 2017 CHAS

Units affordable to	< 30%	30-50%	50-80%	80-100%	> 100%	Total Owner
households that earn:	AMI	of AMI	of AMI	AMI	of AMI	Units
Less than 50% AMI	2,059	2,685	5,085	2,965	7,839	20,633
50% - 80% AMI	574	930	2,050	1,760	8,275	13,589
80% - 100% AMI	85	185	260	210	2,100	2,840
Greater than 100% AMI	124	94	305	130	2,200	2,853
Total Owner Households	2,842	3,894	7,700	5,065	20,414	39,915

Table 96: Owner Occupied Affordability – Grand Rapids

Source: 2013 - 2017 CHAS

Table 97: Renter Occupied Affordability - Wyoming

Units affordable to households that earn:	< 30% AMI	30-50% of AMI	50- 80% of AMI	80-100% AMI	> 100% of AMI	Total Rental Units
Less than 30% AMI	360	129	160	65	60	774
30% - 50% AMI	1,075	800	870	165	350	3,260
50% - 80% AMI	775	805	1,640	615	1,445	5,280
Greater than 80% AMI	90	89	30	45	85	339
Total Renter Households	2,300	1,823	2,700	890	1,940	9,653

Source: 2013 – 2017 CHAS

Table 98: Owner Occupied Affordability - Wyoming

Units affordable to households that earn:	< 30% AMI	30-50% of AMI	50- 80% of AMI	80-100% AMI	> 100% of AMI	Total Owner Units
Less than 50% AMI	855	1,278	2,720	2,020	4,610	11,483
50% - 80% AMI	180	365	675	435	3,100	4,755
80% - 100% AMI	55	0	55	55	1,010	1,175
Greater than 100% AMI	50	15	15	55	695	830
Total Owner Households	1,140	1,658	3,465	2,565	9,415	18,243

Source: 2013 - 2017 CHAS

Is there sufficient housing for households at all income levels?

No. The largest gap in housing affordability is among rental households, especially among extremely low- and low-income households. The following projected affordability gap exists for Kent County and Grand Rapids:

Table 99: Rental Housing Gap

	Rental Housing Gap Estimates (2020-2025)							
Income Level (AMHI)	0-30%	31%-50%	51%-80%	81%-120%	121%+			
Low (Income)	\$0	\$24,001	\$40,001	\$64,001	\$96,001+			
High (Income)	\$24,000	\$40,000	\$64,000	\$96,000	Unlimited			
Affordability Level	0-30%	31%-50%	51%-80%	81%-120%	121%+			
Low (Rent)	\$0	\$601	\$1,001	\$1,601	\$2,401			
High (Rent)	\$600	\$1,000	\$1,600	\$2,400	Unlimited			
PSA (Grand Rapids)	1,031	895	966	1,469	979			
SSA (Kent County less Grand Rapids)	266	938	924	1,001	452			
DSA (Downtown Grand Rapids)	656	360	391	476	416			

Source: 2020 Housing Needs Assessment

Table 100: For-Sale Housing Gap

	For-Sale Housing Gap Estimates (2020-2025)							
Income Level (AMHI)	0-30%	31%-50%	51%-80%	81%-120%	121%+			
Low (Income)	\$0	\$24,001	\$40,001	\$64,001	\$96,001+			
High (Income)	\$24,000	\$40,000	\$64,000	\$96,000	Unlimited			
Affordability Level	0-30%	31%-50%	51%-80%	81%-120%	121%+			
Low (Price)	\$0	\$90,001	\$150,001	\$240,001	\$360,001			
High (Price)	\$90,000	\$150,000	\$240,000	\$360,000	Unlimited			
PSA (Grand Rapids)	254	346	949	1,569	430			
SSA (Kent County less Grand Rapids)	-	1,793	1,608	3,870	2,489			
DSA (Downtown Grand Rapids)	-	143	208	162	100			

Source: 2020 Housing Needs Assessment

There is less of a gap for owner-occupied units, but the data indicates a number of low and moderateincome households are living in homes that are more expensive than they might be able to afford. This is due in part to other owners choosing to live in lower cost homes. For example, in the balance of the county, nearly half of the homes affordable to those earning less than 50% AMI are actually occupied by households earning greater than 100% AMI. This step-down effect (people choosing to live in housing that is less than they can afford) may reduce the availability of lower income households out of the market or into a home they can marginally afford.

How is affordability of housing likely to change considering changes to home values and/or rents?

Housing affordability within the region is likely to decline. By 2025, it is estimated that Kent County will add an additional 26,000 residents within 17,500 households. This means the region needs to bring online approximately 3,513 new units annually. In 2019, construction permits were issued for just 2,400

new units. The pace of new unit development, either through new construction or rehabilitation, needs to accelerate to meet both the current and future housing needs. Otherwise, market pressures will likely make housing less obtainable or affordable to households with limited means.

How do HOME rents / Fair Market Rent compare to Area Median Rent?

Allowable HOME rents and Fair Market Rent are below the median contract rent for efficiency and onebedroom units. The HOME rents are above the median rent for all other bedroom mixes. When developing new affordable housing, the HOME rent limits are typically the upper end of rent that can be charged.

				8	
	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Median Rent	\$759	\$744	\$918	\$1,110	\$1,270
(Kent County)	\$759	Ş744	2919	\$1,110	\$1,270
Fair Market Rent	\$686	\$789	\$962	\$1,296	\$1,481
High HOME Rent	\$686	\$789	\$962	\$1,296	\$1,455
Low HOME Rent	\$686	\$752	\$902	\$1,043	\$1,163
Source: 2020 HUD	FMR and HOME Rents; 2014	4-2019 ACS			

Table 101: Monthly Fair Market Rent and HOME Rents – Grand Rapids / Wyoming MSA

How might this impact your strategy to produce or preserve affordable housing?

One challenge developers face is that HOME rent adjustment often lags the actual market cost increases and the HOME rent increase amount does not always keep pace with increased operating costs. For example, HOME rents for a 2-bedroom apartment have only increased 7% over the past five years, or 1.4% annually. These limited increases may make it difficult to develop affordable housing without larger subsidies.

Additionally, as noted the greatest need is for rental housing for households earning 0%-30% AMI. The HOME rents are still too high for many families at that income level to afford so the units will also need additional subsidy either through a project-based voucher, or additional subsidies to reduce the cost of development so rents can be priced at a lower amount. The community must bring additional financial resources to solve the affordability gap, beyond HOME funds.

Discussion

The preceding sections have demonstrated a real need for additional rental and ownership housing in Kent County. These needs are identified in the 2013 – 2017 CHAS data, the Bowen National Research Grand Rapids/Kent County 2020 Housing Needs Assessment, and through the public engagement process.

Within Kent County the additional housing needs over the next five years are:

	Household Income Ranges									
	0-30%	30-50%	50-80%	80-120%	> 120%					
Rental Units	1,297	1,833	1,890	2,470	1,431					
Ownership Units	254	2,139	2,557	5,439	2,919					

Source: 2020 Housing Needs Assessment

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

This section outlines the current conditions of the existing housing stock in the jurisdictions. While housing conditions in the region are generally good, all jurisdictions have housing stock with at least one housing problem as defined by HUD. Those conditions are lacking complete plumbing or kitchen facilities, overcrowding, severe overcrowding and cost burden. Table 102 illustrates the condition of housing within the jurisdictions. Generally speaking, as housing ages repairs and upkeep become increasingly expensive. Grand Rapids has an older housing stock compared to the balance of the county, which can add additional cost to rehabilitation such as the presence of lead-based paint and asbestos. Renter households are more likely to live in housing with at least one HUD-defined housing problem, compared to owner households.

Definitions

For the purposes of this Plan, each jurisdiction provides the following definitions:

Kent County and Wyoming

Standard Condition: A housing unit is considered to be in "standard condition" when it meets or exceeds HUD Housing Quality Standards (HQS). Further, a housing unit is in standard condition when it does not have any critical or major structural defects, has adequate plumbing facilities, and its appearance does not create a blighting influence. This condition requires no more than observable, normal maintenance; dwelling units which are in standard condition have no observable deficiencies, or only slight deficiencies. The Wyoming definition additionally requires that the property meet city property codes to be in standard condition.

Substandard Condition but Suitable for Rehabilitation: A housing unit is considered to be in "substandard condition but suitable for rehabilitation" when it does not meet HUD HQS. Further, a housing unit is in substandard condition but suitable for rehabilitation when it has one or more major and/or critical structural defects but can still be repaired for a reasonable amount. The degree of substandard is either moderate or severe according to the number of defects and the degree of deficiency.

Moderately Substandard: Housing units that have less than three major defects or at least one critical defect and can be restored to a standard condition for a reasonable cost.

Severely Substandard: Housing units that have three or more major defects or at least one critical defect and can be restored to a standard condition for a reasonable cost.

Grand Rapids

A substandard housing unit is considered suitable for repair if the estimated cost of repair is less than double the assessed value of the structure, excluding the value of the land.

Table 102 illustrates housing problems by tenure and community. In general, rental housing has a greater share of housing problems and owner-occupied housing.

Table 102: Housi	Kent Cou	inty	Grand Ra	Grand Rapids Wyoming Balance of Coun			County	
	Households	%	Households	%	Households	%	Households	%
Total	239,236		74,202		27,731	, -	137,303	, -
Owner- Occupied	165,201		40,121		18,046		107,034	
With one selected condition	28,095	17.0%	7,512	18.7%	3,229	17.9%	17,354	16.2%
With two selected conditions	607	0.4%	164	0.4%	166	0.9%	277	0.3%
With three selected conditions	78	0.0%	6	0.0%	25	0.1%	47	0.0%
With four selected conditions	8	0.0%	0	0.0%	0	0.0%	8	0.0%
No selected conditions	136,413	82.6%	32,439	80.9%	14,626	81.0%	89,348	83.5%
Renter- Occupied	74,035		34,081		9,685		30,269	
With one selected condition	31,341	42.3%	15,469	45.4%	4,448	45.9%	11,424	37.7%
With two selected conditions	2,678	3.6%	1,592	4.7%	550	5.7%	536	1.8%
With three selected conditions	266	0.4%	211	0.6%	15	0.2%	40	0.1%
With four selected conditions	35	0.0%	0	0.0%	0	0.0%	35	0.1%
No selected conditions	39,715	53.6%	16,809	49.3%	4,672	48.2%	18,234	60.2%

Table 102: Housing Problems

Source: 2013-2017 CHAS

Need for Owner and Rental Rehabilitation

Table 103 illustrates the pressing rehabilitation needs of owner and renter occupied housing in the region. Within Grand Rapids, nearly 2,700 households live in units lacking complete plumbing or kitchen facilities. In Wyoming, there are 434 similarly situated households, and 1,486 throughout the balance of Kent County.

Table 103: Occupied Structures by Conditions and Tenure

	Owner- Occupied	Renter- Occupied	Total
Grand Rapids			
Lacking complete plumbing or kitchen facilities	540	2,150	2,690
More than 1 but less than or equal to 1.5 persons per room, none of the needs above	1,020	1,750	2,770
More than 1.5 persons per room, none of the needs above	169	820	989
Wyoming			
Lacking complete plumbing or kitchen facilities	104	330	434
More than 1 but less than or equal to 1.5 persons per room, none of the needs above	415	1,069	1,484
More than 1.5 persons per room, none of the needs above	29	325	354
Balance of County			
Lacking complete plumbing or kitchen facilities	531	955	1,486
More than 1 but less than or equal to 1.5 persons per room, none of the needs above	1,530	1,346	2,876
More than 1.5 persons per room, none of the needs above	302	605	907

Source: 2013-2017 CHAS

In addition to concerns of overcrowding and incomplete plumbing and kitchen facilities, it is also important to examine the age of the structure and the characteristics of the occupants. Table 104 through Table 106 illustrate the age of structures by community. Grand Rapids has the highest concentration of older structures, and the balance of the county has the youngest housing stock. Older homes are more likely to have structural and environmental issues. Lead-based paint was widely used until 1978, and asbestos is found in pipe wrapping and plaster in some older homes. Today, both compounds are known to be hazardous.

The building and mechanical systems such as the roof, windows, and HVAC systems must be periodically replaced or upgraded for efficiency and comfort. There is a high probability that many of these units, especially in low- or moderate-income neighborhoods, need repairs, or at the very least energy efficiency upgrades to lower the operating costs to the renters and homeowners.

%

7.2%

100.0%

Table 104. Tear Dune by Tenure D	analice of County				
Year Unit Built	Owner-0	Occupied	Renter-Occupied		
fear Onit Built	Number	%	Number	%	
2000 or later	24,809	23.2%	4,188	13.8%	
1980-1999	35,626	33.3%	12,202	40.3%	
1950-1979	35,765	33.4%	11,645	38.5%	
Before 1950	10,834	10.1%	2,234	7.4%	
Total	107,034	100.0%	30,269	100.0%	
C					

Table 104: Year Built by Tenure – Balance of County

Source: 2013-2017 CHAS

Table 105: Year Built by Tenure – Grand Rapids

Year Unit Built	Owner-0	Occupied	Renter-Occupied		
fear Onit Built	Number	%	Number	%	
2000 or later	1,748	4.4%	2,822	8.3%	
1980-1999	4,478	11.2%	5,806	17.0%	
1950-1979	15,949	39.8%	10,634	31.2%	
Before 1950	17,946	44.7%	14,819	43.5%	
Total	40,121	100.0%	34,081	100.0%	
	•		•		

Source: 2013-2017 CHAS

Owner-Occupied Renter-Occupied Year Unit Built % Number Number 2000 or later 1,700 697 9.4% 1980-1999 3,226 2,967 17.9% 30.6% 1950-1979 8,983 4,834 49.9% 49.8% Before 1950 4,137 12.3% 22.9% 1,187

18,046

Table 106: Year Built by Tenure – Wyoming

Source: 2013-2017 CHAS

Total

Rehabilitation of existing vacant units will play a key role in addressing the current and future housing shortage and will help stabilizing neighborhoods. Using the 2018 CHAS data and data from RealtyTrac, Table 107 outlines the estimated number of vacant units for rent and for sale that could be candidates for rehabilitation. Within the region there are over 10,000 units that have complete kitchen and plumbing facilities that are vacant. Those units may cost less to rehabilitate than the 730 vacant units that lack complete kitchen and plumbing facilities.

100.0%

9,685

Table 107: Vacant Units by Condition	Vacant for Dant	Vacant-for-Sale	Total
	Vacant-for-Rent	vacant-for-Sale	Total
Housing unit lacks complete kitchen or plumbing facilities			
Grand Rapids	185	215	400
Wyoming	85	55	140
Balance of County	150	40	190
Total	420	310	730
Housing unit has complete kitchen and plumbing facilities			
Grand Rapids	4,050	1,290	5,340
Wyoming	1,230	104	1,334
Balance of County	2,490	1,276	3,766
Total	7,770	2,670	10,440
REO and Bank Owned			
Grand Rapids			17
Wyoming			5
Balance of County			15
Abandoned Units "Vacant-Other"			
Grand Rapids			3,193
Wyoming			541
Balance of County			2,282

Table 107: Vacant Units by Condition

Source: 2013-2017 CHAS

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with Lead Based Paint Hazards

Since the 1970's it was known that lead in the environment is a serious health hazard. Lead paint was banned in the U.S. in 1978, but homes and apartments constructed prior to the ban often contain lead paint. When old paint flakes or peals, dust can get on hands, furniture, floors and other household surfaces. According to the Kent County Health Department, historically, the biggest risk for Kent County's children has been lead-contaminated dust.

Table 108 identifies the number of units with children under age 6 by income and tenure. Within Grand Rapids, there are 6,060 units constructed prior to 1979 where children are present. Based on the age of the structure, those units could contain lead-based paint hazards. Of those, nearly 2,000 are occupied by extremely low-income households.

The City of Wyoming has 2,105 units with children that could contain lead-based paint hazards, and there are 3,475 in the balance of the County.

		0% to 30% AMI 30% to 50% AMI			50% to 8		Total
							Total
Year Structure Built	Owner	Renter	Owner	Renter	Owner	Renter	
Grand Rapids							
1939 or earlier	80	990	370	660	685	460	3,245
1940 and 1979	145	770	220	670	530	480	2,815
Total	225	1,760	590	1,330	1,215	940	6,060
Wyoming							
1939 or earlier	0	25	20	55	155	0	255
1940 and 1979	190	295	175	295	455	440	1,850
Total	190	320	195	350	610	440	2,105
Balance of County							
1939 or earlier	5	75	65	70	140	170	525
1940 and 1979	190	425	405	380	965	585	2,950
Total	195	500	470	450	1105	755	3,475

Table 108: Number of Units with Children Under Age 6 at Risk of Lead Based Paint Hazards

Source: 2013-2017 CHAS

Figure 34 identifies the percent of units built prior to 1980, while Figure 35 shows the percent of units built prior to 1979 with a child under the age of 6. Figure 36 shows the proportion of children under age six with elevated blood lead levels.

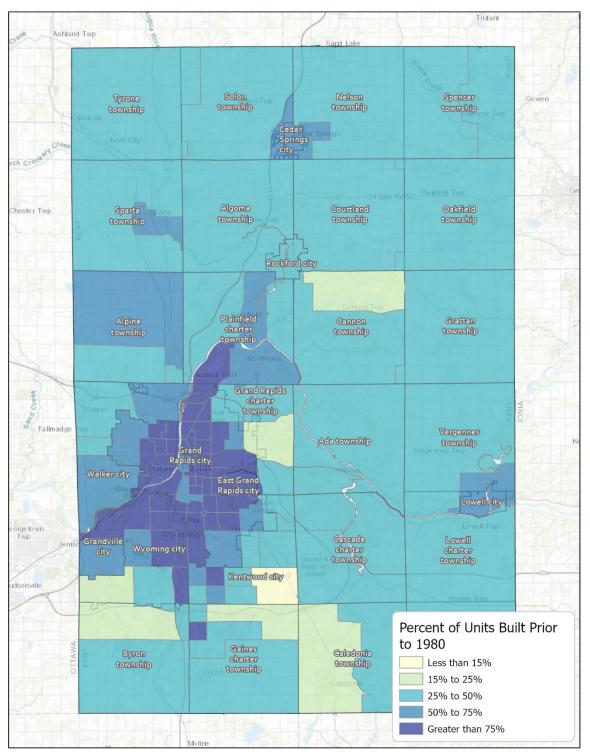
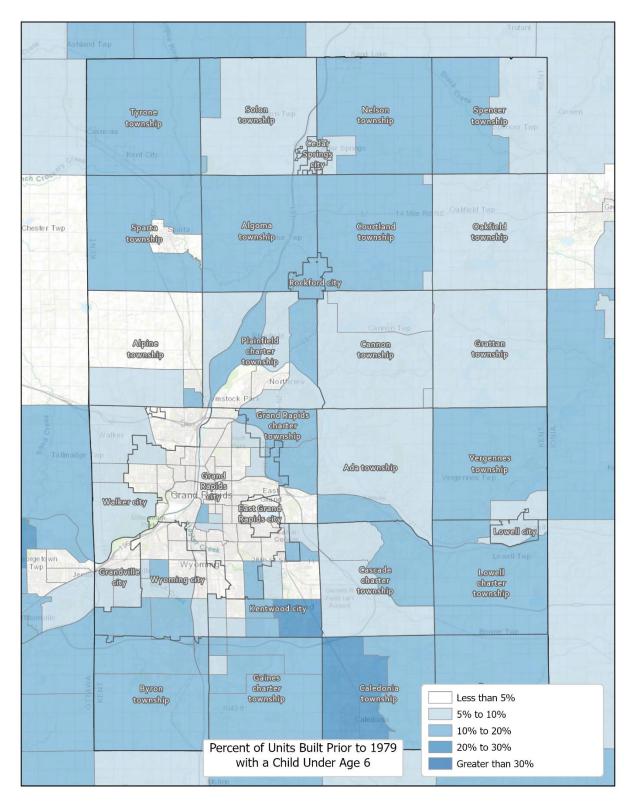


Figure 34: Percent of Units Built Prior to 1980

Source: 2015-2019 ACS

Figure 35: Lead Based Paint Risk



Source: 2013-2017 CHAS

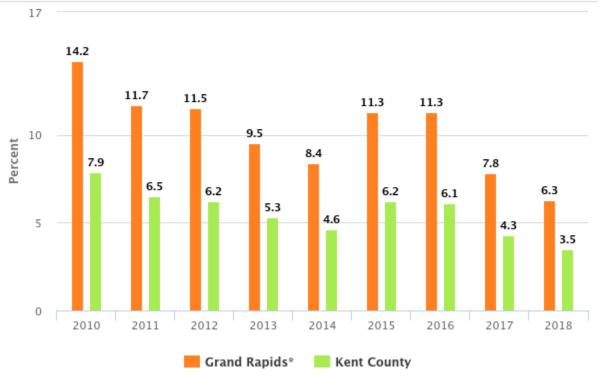


Figure 30: Proportion of Children Under Age 6 with Elevated Blood Lead Levels

Source: Kent County Lead Action Team Report

The Get the Lead Out! lead hazard control program began in January 2005 as a targeted effort to protect children from lead poisoning by fixing lead hazards in older homes in the city of Grand Rapids. It is part of the larger Get the Lead Out! Collaborative, which also focuses upon getting children tested and connected to health care services, educating the public, and advocating for commonsense laws and policies to protect children. Partners in the Get the Lead Out! campaign include: the City of Grand Rapids, Healthy Homes Coalition of West Michigan, Kent County Health Department, Rental Property Owners Association of Kent County and LINC Community Revitalization, Inc.

The lead partner for the Get the Lead Out! Lead Hazard Control program is the City of Grand Rapids' Community Development Department. While childhood lead poisoning has been reduced by more than 90% in Kent County since 2001, lead poisoning in children began to rise in 2015. To combat the recent increases both Kent County and Grand Rapids have formed task forces to address elevated blook lead levels. Grand Rapids is working to end childhood lead poisoning and has made it a priority. The city offers property owners up to \$20,000 in assistance to remove lead hazards. Eligible properties include owner-occupied homes and one- to four-unit rental properties.

Since 2004, more than \$18.9 million in funding has been provided by the U.S. Department of Housing and Urban Development's Office of Lead Hazard Control and Healthy Homes. To date the regional partnership has resulted in more than 1,732 lead-safe homes. As illustrated in Figure 30 the proportion of children under age 6 with Elevated Blood Lead Levels has seen a steady decline in Grand Rapids and throughout Kent County. This strong partnership will continue to move forward with creating additional lead-safe homes.

While the region has made progress, the number of children screened with elevated blood lead levels (BLL) remained high. In 2018, 11,038 children aged 6 and under were screened for BLL, and 340 had elevated BLL's. Over 300 of those children lived in Grand Rapids.

In February 2020, the Kent County Lead Action Team (LAT) was created. The LAT will take on the recommendations from previous partnerships and work to end lead exposure in Kent County.

The Chair of the Kent County Board of Commissioners, Mandy Bolter, and the Mayor of the City of Grand Rapids, Rosalynn Bliss, are co-sponsoring the LAT. Kent County Health Department Administrative Health Officer, Dr. Adam London, is facilitating the group. The steering committee and workgroups are made up of leaders and experts from throughout the community.

The LAT has the following goals:

- Reduce elevated blood lead level rates throughout the county.
- Increase case management of lead poisoned children to ensure that their blood lead levels fall below action levels within six months.
- Implement environmental risk reduction, including communication, inspection, counseling, mitigation, and/or abatement at all addresses which have been prioritized due to multiple cases of elevated blood lead, blood lead levels in excess of 10 micrograms/deciliter, or other criteria established by the Lead Action Team.
- Provide social supports, such as short-term housing, for the people affected by lead to ensure that they have the resources needed to successfully handle their lead crisis.

Discussion

While housing conditions in the region are generally good, all jurisdictions have housing stock with at least one HUD-defined housing condition. Generally speaking, as housing ages repairs and upkeep become increasingly expensive. Grand Rapids has an older housing stock compared to the balance of the county, which can add additional cost to rehabilitation such as the presence of lead-based paint and asbestos. Renter households are more likely to live in housing with at least one housing condition, compared to owner households. The rehabilitation of existing housing, particularly rental housing is a priority need, especially in communities with older housing like Grand Rapids and Wyoming.

Community partnerships within the communities have made great strides in addressing lead-based paint hazards. Additional work should continue including ensuring that all substantial rehabilitation results in a lead-safe housing unit.

MA-25 Public and Assisted Housing - 91.210(b)

Introduction

The four public housing authorities serve over 10,000 households through units owned and managed by the authorities, and the Housing Choice Voucher program. These agencies are integral partners in providing affordable housing options for Kent County residents.

Table 109: Public and Assisted Housing

						Vouchers		
						Specia	l Purpose Vou	cher
	Mod- Rehab	Public Housing	Total	Project -based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled
Grand Rapids	127	230	6,241	1,622	4,619	22	0	1,680
Rockford		52	213	192	22			
Wyoming		195	1,048	190	858			
Balance of County			2,315	982	1,333	174		
Total		477	9,817	2,986	6,832	196		
# of Accessible Grand Rapids	Units 4	27	23					
Wyoming		9						
Rockford		2						

Source: 2020 Public Housing Information Center

Describe the supply of public housing developments:

Within Kent County, there are 477 total public housing units managed by three public housing agencies. As public housing authorities have taken advantage of the Rental Assistance Demonstration (RAD) program, the total number of public housing units has declined, while the number of project-based Section 8 units has increased. Table 109 provides the breakdown of public and assisted housing units by community.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Table 110 outlines the condition scores of the public housing developments within Kent County. The condition scores for most developments within Kent County are good, though the Grand Rapids Scattered Site developments probably need additional rehabilitation. The Grand Rapids Housing Commission plans to sell the remaining scattered site units through its homeownership program.

Development Name	Housing Commission	Condition Score
Rogue Valley Towers	Rockford Housing Commission	98
Westwood Apartments	Wyoming Housing Commission	80
Adams/Campau Park	Grand Rapids Housing Commission	84
Grand Rapids Scattered Sites	Grand Rapids Housing Commission	75

Table 110: Condition of Public Housing Units

Source: HUD Public Housing Information Center

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Grand Rapids Housing Commission

The Grand Rapids Housing Commission continues to reposition its public housing through comprehensive rehabilitation and conversion to project-based Section 8. This repositioning of units to the Section 8 program will allow the Commission to be more responsive to the needs of its current and future residents because operating income will be more consistent, rather than based on congressional appropriations.

Rockford Housing Commission

The Rogue Valley Towers are in good condition. In the future, removing architectural barriers within the development will improve accessibility.

Wyoming Housing Commission

The Wyoming Housing Commission plans to maintain its Westwood Apartments buildings. No major capital needs were identified.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

All three public housing agencies play a vital role in providing housing for low- and moderate-income residents.

Grand Rapids

The Grand Rapids Housing Commission will continue to reposition and modernize its portfolio so that residents are living in the highest quality environment possible. Additionally, the Commission will continue to:

- Pursue funds to expand the Family Self-Sufficiency Program.
- Expand resident access to services that support economic opportunities.
- Apply for 200 additional rental vouchers to expand choice and opportunity.
- Continue to develop home ownership opportunities through the scattered site program.
- Work with partner agencies to leverage funds to create 50 additional low-income housing units.

Wyoming Housing Commission

The Wyoming Housing Commission plans to:

- Apply for additional Housing Choice Vouchers as they become available.
- Expand the number of residents participating in the Family Self-Sufficiency program.
- Increase the number of public housing units within its portfolio.
- Continue to develop homeownership opportunities among its residents.

Discussion

The public housing authorities continue to play a major role in providing affordable housing opportunities to their residents. As they continue to modernize the housing stock, additional housing opportunities will become available to Kent County residents. Additionally, the housing authorities want to partner with other affordable housing developers to bring additional affordable units on the market.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

There are over 2,600 year-round beds in Kent County that support the needs of the homeless. This includes emergency shelters, transitional housing, rapid rehousing, and permanent supportive housing. The homeless facilities and services are coordinated through The Grand Rapids Coalition to End Homelessness, which is a collaborative of more than 60 organizations, agencies, municipalities, and individuals who come together with the shared goal of ending homelessness.

Homeless Facilities

Table 111: Facilities and Housing Targeted to Homeless Households – Kent County

	Emergency	Shelter Beds	Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	282		164	430	
Households with Only Adults	504	40	108	609	
Chronically Homeless Households				256	32
Veterans	18		9	309	
Unaccompanied Youth	15		67		32
Total Beds	801	40	272	1,039	32

Source: 2020 Homeless Inventory

Table 112: Rapid Rehousing Units - Kent County

Households w/Children	Only Adults	Veterans	Chronic	Youth
214	67	16	32	7

Source: 2020 Homeless Inventory

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The Coalition to End Homelessness counts among its members various health, mental health, and employment service providers. The Steering Committee of the Coalition includes representatives from the following organizations that ensure policies are in place to provide mainstream services to the homeless community:

- Network180 Mental and physical health services
- Fair Housing Center of West Michigan Housing advocacy
- Legal Aid of West Michigan Legal services for low-income persons
- Wege Clinic Medical services
- InterAct of Michigan Mental health and substance abuse services

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

The 2020 Housing Inventory Chart for the CoC identified 60 projects that contained a total of 2,622 beds. This includes facilities and beds for the following populations:

Table 113: Homeless Facilities

Homeless Services Type	Number of Beds
Homeless Individuals	1,336
Homeless Families	1,271
Veterans	363
Unaccompanied Youth	100
Chronically Homeless	320

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

This section describes the facilities and services available to special needs populations. As the population ages, additional facilities and services will be necessary to serve the growing number of residents with a disability. Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify and describe their supportive housing needs.

Table 114 illustrates the number of households with at least one member having a disability. Over half of the households in Grand Rapids have at least one member with a disability. In Wyoming, there are nearly 18,000 households with at least one member having a disability, and within the balance of the county, over 53,000 households. A household may have more than one type of disability.

The prevalence of households with a disability is likely to continue to grow as the population ages. These individuals will need assistance with daily living tasks, transportation, and possibly additional medical services. Those with a self-care or independent living limitation may need additional services such as congregate living facilities or at-home care. While Medicare and/or Medicaid will likely cover the expenses of very low-income households and the elderly, those who are above the Medicaid line may face challenges paying for these needed services.

Table 115 outlines the number of households with elderly and frail elderly residents. These residents may have difficulty with transportation or maintaining their homes due to their age and/or a health condition. Services that assist the elderly will become increasingly important as the Kent County region ages.

A number of supportive services exist for other special needs clients throughout the region. During the community engagement focus groups, many participants felt the needs of these residents were being addressed in a very comprehensive manner.

	Cognitive limitation	Vision Impairment	Self-care or Independent Living limitation	Ambulatory limitation	Total
Grand Rapids					
0% to 30% AMI	5,580	3,480	5,890	5,790	20,740
30% to 50% AMI	4,250	3,470	4,180	4,625	16,525
50% to 80% AMI	3,370	3,530	3,840	4,615	15,355
Total	13,200	10,480	13,910	15,030	52,620
Wyoming					
0% to 30% AMI	1,620	840	1,345	1,690	5,495
30% to 50% AMI	1,330	1,190	1,350	1,835	5,705
50% to 80% AMI	1,580	1,290	1,830	1,860	6,560
Total	4,530	3,320	4,525	5,385	17,760
Balance of County					
0% to 30% AMI	3,955	3,200	3,530	4,670	15,355
30% to 50% AMI	3,160	4,100	4,080	5,090	16,430
50% to 80% AMI	5,135	5,130	4,970	6,590	21,825
Total	12,250	12,430	12,580	16,350	53,610

Source: 2013 – 2017 CHAS

Table 115: Households with Fran Elderly Resident by income							
	0% to 30% AMI		30% to 50% AMI		50% to 80% AMI		Total
	Owner	Renter	Owner	Renter	Owner	Renter	
Grand Rapids							
At least 1 person age 62-74 but no one age 75+	545	1,280	925	580	1,720	735	5,785
At least 1 person age 75+	615	610	1,115	980	1,305	475	5,100
Wyoming							
At least 1 person age 62-74 but no one age 75+	310	250	350	205	750	220	2,085
At least 1 person age 75+	170	100	355	260	540	155	1,580
Balance of County							
At least 1 person age 62-74 but no one age 75+	1,200	745	1,795	735	4,485	690	9,650
At least 1 person age 75+	1,385	425	2,370	755	2,915	500	8,350

Table 115: Households with Frail Elderly Resident by Income

Source: 2013-2017 CHAS

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

The Grand Rapids Coalition to End Homelessness ensures there is a coordinated entry system for institutionalized individuals to receive supportive housing. The most recent strategic plan outlined goals to ensure persons returning from mental and physical health institutions received appropriate housing. Those goals and activities include:

- Work with Prisoner Reentry to improve permanent housing outcomes within Michigan Department of Corrections Prisoner Reentry program.
- Increase coordination between foster care and homeless service providers to ensure transition plans are sustainable for youth and prevent homelessness after benefits expire.
- Provide housing planning assistance training for providers planning discharge for consumers from medical, mental health, foster care and reentry systems.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e) TBD during Action Plan Development.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

TBD during Action Plan Development.

MA-40 Barriers to Affordable Housing – 91.210(e)

There are a number of barriers to affordable housing including development costs, lack of financial resources to lower the housing cost, or regulatory barriers such as tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

Construction costs and lack of gap financing is the single largest barrier to affordable housing. Housing developers indicated during focus group meetings that the cost of materials significantly increased over the past few years. The availability of resources to fill the development gap has also decreased. The Bowen National Research Grand Rapids/Kent County 2020 Housing Needs Assessment noted:

"A significant challenge in the county is the imbalance between the costs/rents associated with the existing housing stock and the ability of households to pay for such housing. As shown in this report, there appears to be a relatively large inventory of higher priced for-sale homes and rental units that most households in the market cannot reasonably afford. In an effort to support the development and preservation of more affordable housing alternatives, local governments should consider supporting projects being developed with affordable housing development programs (e.g. Tax Credit and HUD programs), providing pre-development financial assistance, implementing inclusionary zoning (requiring market-rate developers to include some affordable housing units), supporting a Housing Trust Fund, and providing lowinterest loans (and/or forgivable loans/grants) to lower income households that can be used for covering costs directly associated with the repairs and maintenance of the existing housing stock. Focus should be placed on those programs that support low-income households (seniors and families), workforce households, and first-time homebuyers. Additional housing is needed in order to have a healthy housing market, which will ultimately contribute to the local economy, quality of life and overall prosperity of Kent County."

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The most common public sector barrier to affordable housing are overly restrictive zoning practices such as limiting the number of unrelated persons living as a household, overly large minimum lot or building sizes, and the lack of diverse housing types permitted in each zoning district.

In 2015, Grand Rapids began focusing on ways to encourage affordable housing development through a process called the Great Housing Strategies. This planning effort made a number of positive changes to the Grand Rapids zoning ordinance to encourage affordable housing development including reducing minimum lot widths, allowing micro-units, and reducing the development requirements for attached single-family homes.

An effort titled Housing NOW! made additional zoning recommendations intended to reduce the barriers to developing housing. Those changes included:

- Eliminating lot area requirements of 20,000 square feet
- Reducing minimum dwelling unit width from 18' to 14'
- Reducing barriers to construct Accessory Dwelling Units

One regional site selection impediment relates to the allocation of Low-Income Housing Tax Credits (LIHTC) through the annual competitive Qualified Allocation Plan (QAP) administered by the Michigan State Housing Development Authority. Focus group participants discussed the funding of affordable housing. They indicated the QAP in its current design allows neighborhoods around downtown Grand Rapids to score well, but areas outside of Grand Rapids typically score poorly. This leads to less development of affordable housing in the suburban or rural areas of the county, and ultimately less housing choice options for Kent County residents.

Kent County stakeholders should work with the State of Michigan to encourage additional affordable housing and housing choice options throughout the County.

PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures, Housing Choices for Certificate and Voucher Holders

Based on data from HUD, the average time on the waiting list for an HCV was 30 months in Grand Rapids and Kent County. Based on discussions and interviews with fair housing advocates, affordable housing developers, and landlords there are two contributing factors. The first and most important is the lack of HCV available in the region to meet the demands of low- and moderate-income residents. The availability of HCV is contingent on the number of vouchers authorized and funded by Congress and HUD.

The second factor contributing to long wait times is the low participation rate of landlords willing to accept HCV. It was often discussed that larger apartment complexes, like those located near job and transportation centers, were unwilling to accept vouchers. The City of Grand Rapids attempted to ameliorate this issue by including source of income as a factor in which a landlord cannot discriminate. However, this provision has not been enforced and is a source of frustration to fair housing advocates and landlords alike.

Sale of Subsidized Housing and Possible Displacement

As previously mentioned, there are approximately 955 subsidized units at risk of being lost from the affordable housing inventory due to expiring Section 8 contracts. Given the strength of the Grand Rapids area housing market, it is likely some owners may opt out of renewal if the rents they can get in the open market are more than the updated contract rents.

Property Tax Policies

Payment in Lieu of Taxes. A number of property tax policies exist to encourage the development of affordable housing and to limit the effects of rising property values on low-income residents. In the City of Grand Rapids, qualified federal or state assisted low-income housing developments are exempt from property tax assessments. Housing projects approved for such an exemption make payment in lieu of taxes (PILOT) for the rent restricted units by paying one of the following:

- 1. A service charge in an amount equal to 4% of annual shelter rent, or
- 2. A service charge in an amount equal to 1% of annual shelter rent in addition to making an annual contribution into the City's Affordable Housing Fund in an amount equal to 4% of annual shelter rent.

PILOT reduces operating costs and helps units to remain affordable.

Additionally, state law permits other tax relief mechanisms for low-income residents, this includes:

- **Real Property Poverty Exemption Program**. This allows very low-income residents to be exempt from property tax obligations if they meet certain poverty income guidelines and demonstrate they cannot afford the tax liability.
- **Property Tax Deferments**. This is a temporary deferment of payments while a household is experiencing a financial hardship.
- **Nonprofit Housing Tax Exemption**. This is a temporary exemption designed to lower the costs of developing affordable housing by non-profit agencies. This exemption is up to three years, or when the property transfers to a new low-income tenant or owner.

During focus group discussions with affordable housing developers and advocates, they expressed concern that not all Kent County jurisdictions participated in or authorized Payment in Lieu of Taxes (PILOT) programs for affordable housing developments. The affordable housing advocates and developers felt that increased PILOT utilization would expand the amount of affordable housing developments in Kent County, and also allow LIHTC applications to score better in the rural areas.

Strategies to Address Affordable Housing

The Bowen National Research Grand Rapids/Kent County 2020 Housing Needs Assessment identified the following strategies to be used as a guide by local government, stakeholders, developers and residents to help inform housing development decisions:

- 1) Set realistic/obtainable short-term housing goals, outline long-term objectives and monitor progress. Short-term goals should be focused on establishing an Action Plan that outlines priorities for the county, such as broad housing policies, initiatives, and incentives that support the preservation and development of residential units.
- 2) Develop regional-level housing plans with input from local communities.
- 3) Develop strategies to attract people that currently commute into Kent County to live in Kent County. There were a total of 408,724 persons employed within Kent County in 2017. A total of 81,472 workers leave the county for employment during the day, while 184,283 people that work in the county commute from outside of the county. This inflow of over 184,000 workers comprise nearly half (45.1%) of all Kent County employees and represents an opportunity for the county to retain many of these commuters as permanent residents.
- 4) Support efforts to develop residential units along or near public transportation corridors and/or within walkable communities. The national trend of developing multifamily housing near public transit routes and within walkable downtowns continues. Several areas within Kent County are along or near public transit routes and/or within walkable areas that would serve as ideal locations for new multifamily residential development. In addition to supporting new residential developments, local governments should work toward improving access from existing and potential residential sites to public transit routes and/or to walkable downtowns.
- 5) **Consider implementing/modifying policies to encourage or support the development of new residential units**. One of the key findings from this report was that there is limited availability among the existing housing stock in the county. While there is a notable number of residential

units in the development pipeline, projected job and demographic growth over the next few years will be significant and will require a steady introduction of new residential units to keep pace with the growing housing demand.

- 6) Explore programs, funding sources and initiatives that support the development and preservation of housing, particularly affordable housing. A significant challenge in the county is the imbalance between the costs/rents associated with the existing housing stock and the ability of households to pay for such housing.
- 7) Support efforts to enable area seniors to transition into housing that meet their changing **needs**. Kent County has a very large base of older adults with significant growth projected to occur among senior households ages 65 and over.
- 8) Preservation of existing housing should be an area of focus. Kent County has a large inventory (more than 7,500 units) of housing that is classified as "substandard housing." This includes units that lack complete indoor plumbing or are overcrowded. It is likely that many of these substandard housing units suffer from deferred maintenance and neglect and are likely in need of repairs and modernization. Priorities should be placed on means to preserve and renovate the existing housing stock.
- 9) Identify and market Kent County to potential residential developers. Using a variety of sources, the county should attempt to identify and market itself to the residential developers active in the region.
- 10) **Explore and encourage development partnerships.** Government entities within the county may want to establish formal relationships with other entities to support housing development efforts.

Building on past studies, efforts and opportunities, Housing Next prepared the *Grand Rapids Housing Needs and Opportunities, 2020* report. The report was prepared with input from city staff, local non-profits, community organizations, housing advocates and housing developers.

The report recommends the following elements for immediate exploration.

- Preserve existing affordable housing whenever possible. Efforts should be undertaken to
 preserve existing subsidized housing that are nearing their final compliance date and are in
 danger of being converted to market-rate housing. Additionally, non-income restricted
 properties that have not seen dramatic price or rent escalation should also be targeted.
 Resources should be directed to provide gap-financing for preservation projects.
- 2) Support tenant-based rental assistance and eviction prevention measures. While the Grand Rapids has a source of projection ordinance, it can be difficult to enforce. The report recommends engaging in national education and advocacy efforts to increase annual federal spending for Housing Choice Vouchers, ESG and HOME grants. Increased code enforcement pertaining to source of income discrimination claims, and coordinated dialog with regional foundations to support local tenant-based rental assistance and eviction prevention programs.

- 3) Leverage City-owned property to support new housing supply. Wherever appropriate, publicly Wherever appropriate, publicly-owned parcels that are determined to be ready for redevelopment should be assigned to the Brownfield Redevelopment Authority or similar agency to pursue a development strategy in partnership with a non-profit or for-profit developer. Additionally, support additional LIHTC housing in appropriate areas, and mixed-income financing in Neighborhoods of Focus.
- 4) Deep community engagement. Many local leaders, neighborhood groups and affordable housing advocates have expressed reticence toward new zoning provisions that would allow more housing in their neighborhoods. Early conversations should be focused in neighborhoods closest to downtown, high frequency transit corridors, the river, and traditional business districts. These neighborhoods will be in the greatest demand over the next five years and will be most likely to see dramatic price increases.
- 5) **Re-calibrate economic development incentives to support more affordability**. Local economic development incentives are a critical ingredient to ensure that an adequate supply of new housing can be produced over the next five years. The use of tax incentives designed to make new projects financially feasible is imperative. The report recommends the Economic Development team continue to communicate proactively with developers about priorities to support more affordable housing options with the expectation that the availability of local incentives will become dependent upon a specific guarantee of affordability in the future.
- 6) Begin work to create a dedicated source of funding for housing. The City of Grand Rapids has been a highly dynamic, urban real estate market for most of the last decade, with a strong demand for more infill housing at all price points. All research to-date indicates that a dedicated source of consistent funding which is scaled appropriately to the size of the housing need will be critical to achieve meaningful progress. A dedicated source of funding for housing is necessary because the existing limited federal resources are insufficient to address the housing needs of the community.

The report also identifies the following mid-term implementation strategies:

- Adopt an Inclusive Housing Plan (5-year and 10-year goals). Develop and adopt an inclusive housing plan that outlines reasonable housing development goals across each city neighborhood.
- 2) Allow for more housing in every neighborhood. The report recommended adjusting various development codes to allow additional density in neighborhoods. Examples include accommodating a second dwelling unit, by-right, in certain zoning districts, so long as one of the units is preserved as affordable; allowing larger lots to be subdivided into two parcels; and reducing regulatory barriers to three or more units on properly sized lots or corner parcels with the condition that at least one unit remains affordable at 60% AMI or below.
- 3) Establish dedicated revenue and grow Affordable Housing Fund. The City of Grand Rapids will need a minimum \$20 -\$25 million fund to support housing needs over the next 5 years. Up to 75% of that fund can be targeted as low-interest revolving loans to fill equity, credit

and debt financing gaps. At least 25% of the fund should be planned as grant or direct subsidy for the lowest income households. Under some circumstances it may prove more expedient for the fund to support direct giving from donors to local non-profits.

- 4) Ensure access to capital for homeowners and small-scale developers. All of the city's population must be able to share in the wealth creation that results from new housing development. This may require a soft lending source to support down payment assistance and collateral support to ensure all interested parties are able to secure adequate financing. As demand for a scarce amount of property continues to rise in the City of Grand Rapids, there is a limited set of tools available to ensure that BIPOC residents and business owners have equal access to opportunity to share in that wealth creation. A critical step toward ensuring an equitable distribution of both housing and opportunities for wealth creation is to be very intentional about providing access to capital for Black, Indigenous and People of Color.
- 5) Establish and staff a central redevelopment authority. The report recommends consideration be given to utilizing the brownfield redevelopment authority or land bank fast track authority to execute this work. Close working relationships with entities such as the Housing Commission, the Affordable Housing Fund and other agencies are critical to proper planning and execution of desired neighborhood goals.
- 6) Implement gap-financing programs where market forces are failing. The report acknowledges land and construction costs are high and therefore tax incentives are still necessary to support market-rate housing, and recommends those incentives could be conditioned upon the preservation of specific rent levels for a defined period of time (i.e. 80% AMI rents for 20 years) on a share of the overall unit mix. As neighborhood amenities (retail, parks, schools, transit, museums, etc.) improve to meet demand, local economic incentives should be reduced and eventually should become unnecessary to support true market-rate housing.
- 7) Catalyze market rate housing downtown and along transit corridors (alongside affordable housing). New market rate housing will not result in a direct correlation to more affordable units in the short-term. However, the more developers are able to respond to demands for market rate housing, the less upward pressure there is on the price of existing naturally occurring affordable housing. The report emphasizes that market rate housing must be carefully balanced with the preservation of existing affordable housing, but the importance of new housing cannot be over-stated. A particular focus on additional market-rate housing in downtown Grand Rapids and along high frequency transit corridors is recommended.
- 8) Regional collaboration. The report recommends numerous opportunities for regional collaboration to spur housing development including expansion of the Payment in Lieu of Tax program, advocating changes in state law to broaden tax exemption incentives for smaller developments, city landbanks, and expanding the TIF program to provide gap financing for housing development.

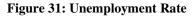
MA-45 Non-Housing Community Development Assets - 91.215 (f)

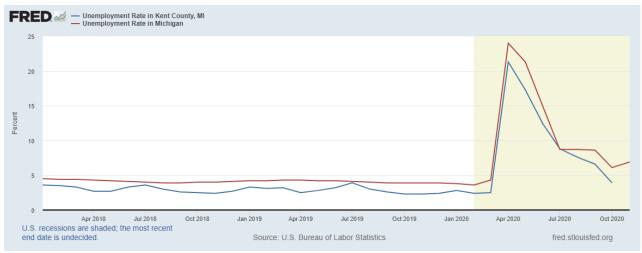
Introduction

This section focuses on Kent County's regional economy and its impact on the housing market and residents' economic well-being.

The Kent County economy has been strong over the past five years, with the exception of recent spikes in unemployment due to COVID-19. Figure 31 shows Kent County's unemployment rate along with the State of Michigan. In general, Kent County's rate has hovered between 4% - 5% unemployment, which is nearly full employment. As the graph indicates, COVID-19 completely disrupted the Kent County economy, with unemployment reaching nearly 25% in early 2020. While the unemployment rate has begun to settle to normal levels, it may not fully recover over the next year.

Table 116 and Table 117 illustrate the number of jobs and number of workers in each sector by community.





Source: Federal Reserve Bank of St. Louis

Economic Development Market Analysis

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs Less Workers
Agriculture, Forestry, Fishing and Hunting	2,431	1,584	0.8%	0.4%	-847
Mining, Quarrying, and Oil and Gas Extraction	120	80	0.0%	0.0%	-40
Utilities	851	856	0.3%	0.2%	5
Construction	12,244	16,257	4.0%	4.0%	4,013
Manufacturing	53,716	66,390	17.6%	16.2%	12,674
Wholesale Trade	17,960	27,541	5.9%	6.7%	9,581
Retail Trade	30,016	39,729	9.8%	9.7%	9,713
Transportation and Warehousing	8,315	11,028	2.7%	2.7%	2,713
Information	3,702	4,525	1.2%	1.1%	823
Finance and Insurance	12,649	17,403	4.1%	4.3%	4,754
Real Estate and Rental and Leasing	3,491	4,097	1.1%	1.0%	606
Professional, Scientific, and Technical Services	14,955	17,826	4.9%	4.4%	2,871
Management of Companies and Enterprises	4,336	6,678	1.4%	1.6%	2,342
Administration & Support, Waste Management and Remediation	26,544	55,273	8.7%	13.5%	28,729
Educational Services	25,189	26,335	8.2%	6.4%	1,146
Health Care and Social Assistance	44,390	59,292	14.5%	14.5%	14,902
Arts, Entertainment, and Recreation	3,579	4,390	1.2%	1.1%	811
Accommodation and Food Services	24,858	29,740	8.1%	7.3%	4,882
Other Services (excluding Public Administration)	10,660	13,578	3.5%	3.3%	2,918
Public Administration	5,907	6,122	1.9%	1.5%	215
Total	305,913	408,724			102,811

Source: Census 2017 Longitudinal Employer-Household Dynamics

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs Less Workers
Agriculture, Forestry, Fishing and Hunting	729	72	0.8%	0.1%	-657
Mining, Quarrying, and Oil and Gas Extraction	23	21	0.0%	0.0%	-2
Utilities	226	240	0.2%	0.2%	14
Construction	2,759	2,828	3.0%	2.3%	69
Manufacturing	14,486	16,824	15.8%	13.5%	2,338
Wholesale Trade	4,811	4,594	5.3%	3.7%	-217
Retail Trade	8,310	9,706	9.1%	7.8%	1,396
Transportation and Warehousing	2,234	955	2.4%	0.8%	-1,279
Information	1,091	2,013	1.2%	1.6%	922
Finance and Insurance	3,458	4,858	3.8%	3.9%	1,400
Real Estate and Rental and Leasing	1,055	1,834	1.2%	1.5%	779
Professional, Scientific, and Technical Services	4,565	7,959	5.0%	6.4%	3,394
Management of Companies and Enterprises	1,276	321	1.4%	0.3%	-955
Administration & Support, Waste Management and Remediation	9,224	10,557	10.1%	8.5%	1,333
Educational Services	7,315	10,663	8.0%	8.6%	3,348
Health Care and Social Assistance	14,774	30,547	16.2%	24.5%	15,773
Arts, Entertainment, and Recreation	988	1,079	1.1%	0.9%	91
Accommodation and Food Services	8,994	11,392	9.8%	9.1%	2,398
Other Services (excluding Public Administration)	3,492	4,368	3.8%	3.5%	876
Public Administration	1,621	3,820	1.8%	3.1%	2,199
Total	91,431	124,651			33,220

Table 117: Grand Rapids Business Sectors - 2017

Source: Census 2017 Longitudinal Employer-Household Dynamics

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Like many Midwest communities, the manufacturing and healthcare sectors are major employment centers and account for about 30% of all jobs. Manufacturing has traditionally been a high wage industry, but that has continued to erode over the years. Additionally, manufacturing was an industry that did not need advanced education. Today, many manufacturing jobs are more automated, requiring a certificate or advanced training beyond a high school diploma.

Both in Kent County and in Grand Rapids, of the major employment sectors, there are more jobs available than held by residents of the jurisdiction. For example, in Grand Rapids there are over 30,500 healthcare jobs, yet less than 15,000 are held by Grand Rapids residents. There is room to fill those jobs with Grand Rapids residents.

Similarly, in Kent County, there are over 66,000 manufacturing jobs, but less than 54,000 are held by Kent County residents. Job training and recruitment should focus on those employment clusters that could be filled by local residents.

Describe the workforce and infrastructure needs of the business community:

Kent County has an overall unemployment rate of 4.8%, which includes an exceptionally low unemployment rate for workers aged 25 - 65 (2.8%), but the youth unemployment rate is quite high at 12.2%. Table 118 illustrates the Kent County labor force.

Grand Rapids overall unemployment rate is nearly 7%. This is driven largely by the high number of unemployed youth age 16 - 24 at 12.48%. Efforts should be made to engage this segment and better incorporate them into the workforce.

Table 118: Kent County Labor Force

Labor Force	Number of People
Total Population in the Civilian Labor Force	346,227
Civilian Employed Population 16 years and over	346,056
Unemployment Rate	4.8%
Unemployment Rate for Ages 16-24	12.2%
Unemployment Rate for Ages 25-65	2.8%
Source: 2013 – 2018 ACS	

Table 119: Grand Rapids Labor Force

Labor Force	Number of People
Total Population in the Civilian Labor Force	107,170
Civilian Employed Population 16 years and over	107,089
Unemployment Rate	6.8%
Unemployment Rate for Ages 16-24	12.48%
Unemployment Rate for Ages 25-65	5.23%
Source: 2013 – 2018 ACS	

Figure 32 and Figure 33 are maps of the Labor Engagement Index. This index measures how connected residents are to the job market. The index goes from 0 - completely disengaged to 100 - completely engaged. A higher number indicates a more engaged labor force within the community.

Within the balance of Kent County, areas to the east and south are highly engaged. However, Cedar Springs in northern Kent County is highly disengaged. Job training and outreach efforts within the County should target this area.

Within Grand Rapids, the neighborhoods southwest of downtown have very low labor market engagement among their residents. These areas are also neighborhoods that have high concentrations of poverty and minority residents. Workforce development efforts should target these neighborhoods.

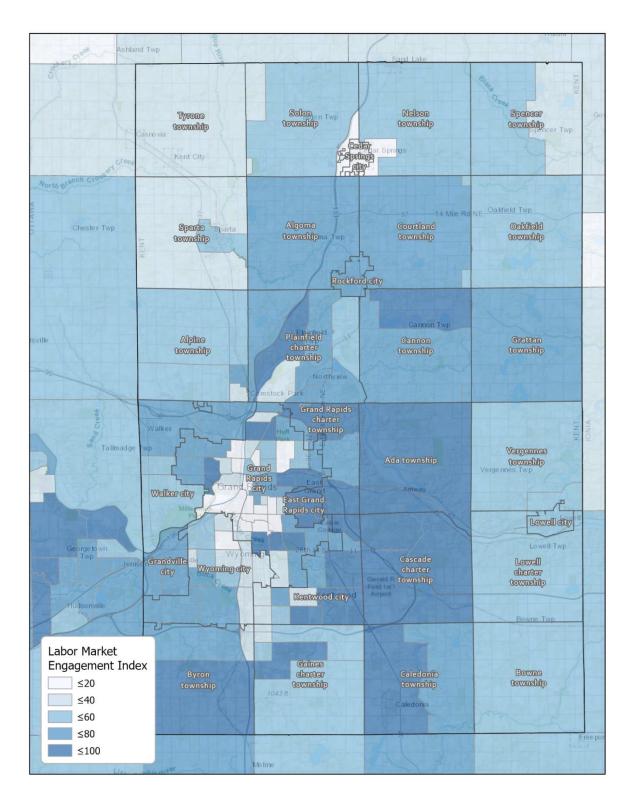


Figure 32: Labor Market Engagement – Kent County

Source: HUD eGIS

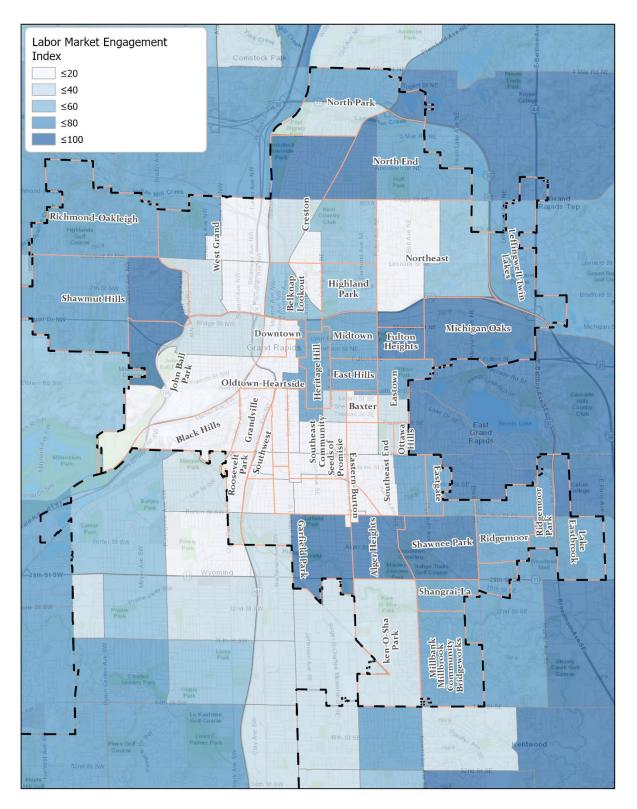


Figure 33: Labor Market Engagement – Grand Rapids

Source: HUD eGIS

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

COVID-19 was a devastating economic impact to the region, and particularly low- and moderate-income neighborhoods whose residents were employed in service or retail sector jobs. The economic disruption also extended to their housing stability. Recently, all efforts have been targeted towards economic recovery.

Looking forward, continued job growth and economic expansion is expected in the Grand Rapids region. As the Economic Engagement maps illustrate, much work needs to be done to connect many residents to jobs and employment opportunities, particularly in minority concentrated areas and with young adults who have a high unemployment rate.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

As the manufacturing sector becomes a smaller share of the local economy, and as jobs become more automated, workers will need education and training beyond a high school diploma or GED. Additional certificates or training will be necessary to compete. As the labor market engagement map illustrates, there are significant areas where residents are disengaged. Those areas should be targeted for intervention strategies to connect residents with job training and work opportunities.

Both in Grand Rapids and Kent County, there are a number of job sectors that could be filled by residents but are being filled by commuter workers. This includes manufacturing and healthcare jobs. Efforts should be made to link residents with job training programs targeted toward these industries.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's consolidated plan.

Workforce training initiatives exist through Grand Rapids Community College. Participants during the economic development focus group indicated that the State of Michigan is a key participant and coordinator of workforce development initiatives. Focus group participants indicated the workforce development initiatives should be better coordinated among agencies, and case workers should have more time to devote toward client needs.

Focus group participants indicated that programs to develop and support entrepreneurs are lacking or insufficient in Grand Rapids and Kent County. They suggested focused programs, designed to be flexible and adaptable, are needed rather than one-size-fits-all business incentive programs.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated?

A large segment of households in the southern neighborhoods of Grand Rapids have one or more of the four severe housing problems. Additionally, many of the neighborhoods are also racially or ethnically concentrated areas of poverty.

Within Kent County, housing problems are more prevalent in the northern and eastern townships as illustrated by Figure 34.

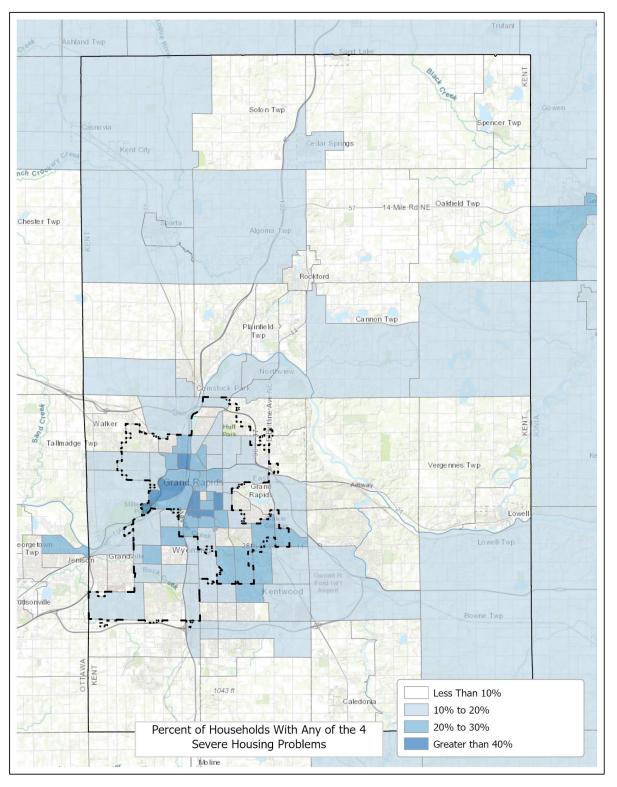


Figure 34: Households with any of the four severe housing problems

<u>Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families</u> are concentrated? (include a definition of "concentration")

Figure 35 through Figure 38 indicate areas of racial and ethnic concentration. For the purpose of the plan, racial and ethnic concentration is defined as greater than 200% of the population as a whole.

In Grand Rapids, 21.4% of the overall population is Black and 17.5% is Hispanic. Therefore, in Grand Rapids, a minority concentrated area is a tract where more than 42% of the residents are Black or more than 35% of the residents are Hispanic. Figure 35 illustrates areas with a concentration (more than 42% of the population) of Black residents. Figure 36 illustrates areas with a concentration (more than 35%) of Hispanic residents.

In the balance of Kent County, approximately 4.3% of the residents are Black and approximately 5.3% are Hispanic. Therefore, a minority concentrated area in the balance of the county is a tract with more than 8.5% Black residents or more than 10% Hispanic residents. Figure 37 illustrates areas with a concentration (more than 8.5%) of Black residents. Figure 38 illustrates areas with a concentration (more than 10%) of Hispanic residents.

Low-income concentrated areas are defined as census tracts with more than 25% of the population below the poverty line. Figure 39 illustrates the low-income concentration areas in Kent County, which are predominantly within Grand Rapids.

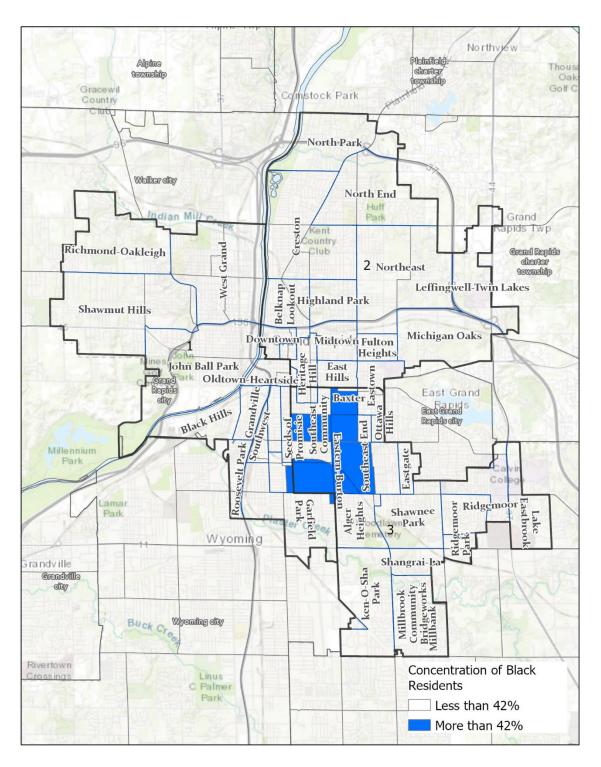


Figure 35: Concentration of Black Grand Rapids Residents

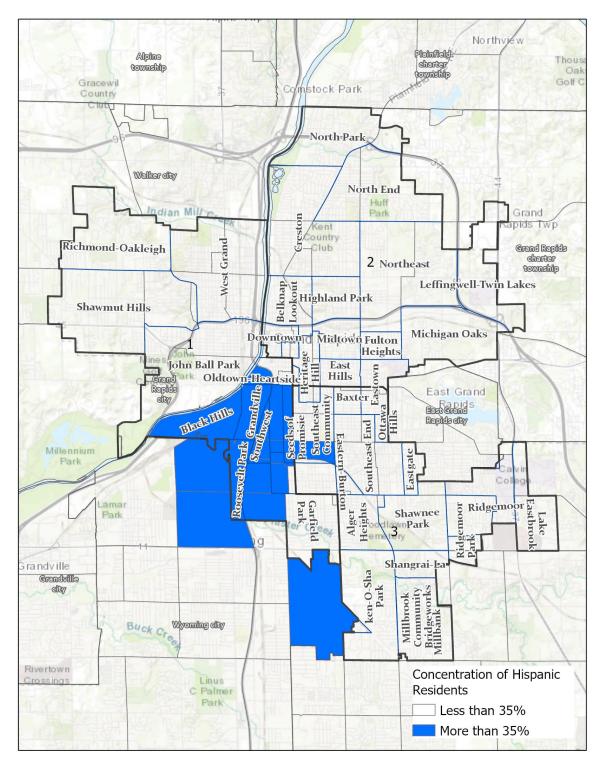


Figure 36: Concentration of Hispanic Grand Rapids Residents

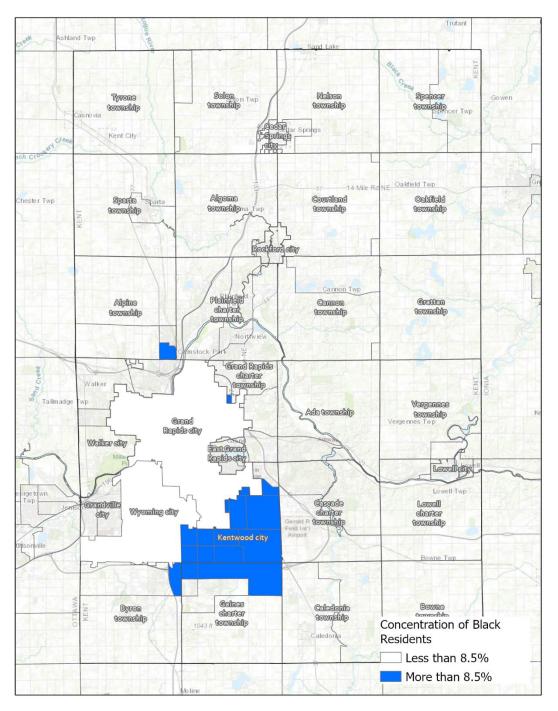


Figure 37: Concentration of Black Kent County Residents

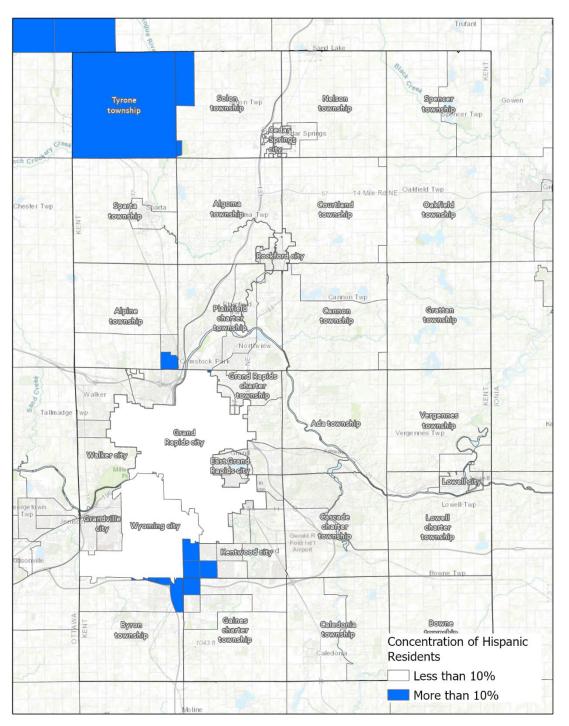


Figure 38: Concentration of Hispanic Kent County Residents

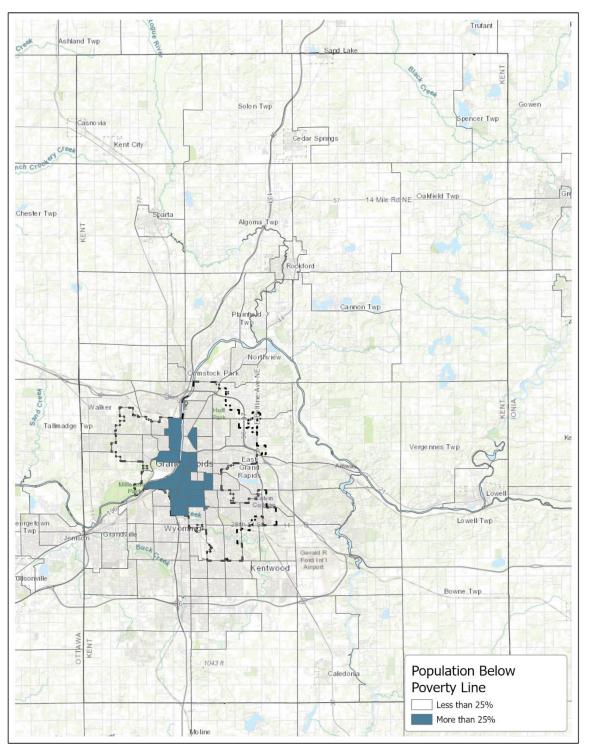


Figure 39: Low Income Concentration in Kent County

What are the characteristics of the market in these areas/neighborhoods?

Many of these neighborhoods are located just south of downtown Grand Rapids in predominately single-family neighborhoods. Due to high housing demand, market pressures are causing rent and price escalations that have many residents concerned about housing stability. There continues to be strong housing demand, and in particular, strong demand for additional affordable housing.

In Kent County, the neighborhoods are largely in growing areas of the County where housing costs are increasing.

Are there any community assets in these areas/neighborhoods?

These neighborhoods are rich with community assets and dedicated residents. The neighborhoods have good access to transportation, healthcare, and job opportunities. There are a number of community anchors such as schools, places of worship, and parks.

Are there other strategic opportunities in any of these areas?

The redevelopment of Division Avenue offers opportunities to further link the neighborhoods between Downtown Grand Rapids and the City of Wyoming. Division Avenue has a concentration of civic and community resources that both Grand Rapids and Wyoming neighborhoods can connect to and benefit from.

The northern areas of Kent County are quite rural, but in the southern areas there is close proximity to jobs and public transportation infrastructure.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The effects of COVID-19, including remote work and education, have brought the need for high-speed broadband to the forefront. It is clear that high-speed connectivity is becoming more necessary, and in many low-income and rural areas access to reliable, affordable broadband can be difficult.

Within Grand Rapids, 80% of internet users have broadband. However, that number drops to 57% for households with an income of less than \$20,000. In Kent County, 84% have broadband, but drops to 59.5% of households earning less than \$20,000.

<u>Describe the need for increased competition by having more than one broadband Internet</u> <u>service provider serve the jurisdiction.</u>

According to Broadbandnow.com, the Grand Rapids and Kent County region are well served by internet providers. Within the region, there are 32 providers and 15 offer residential service. Six of the residential providers deliver internet by fiber optic or cable, and three offer speeds up to 1,000 Mbps. The real barrier to low- and moderate-income residents is cost. Until internet service is a regulated utility, it is unlikely costs will significantly reduce.

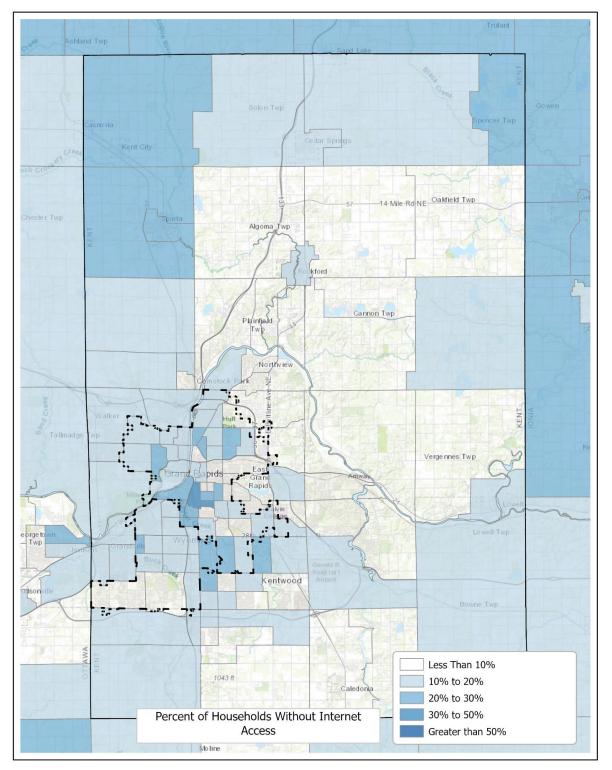


Figure 40: Residents Without Internet Access

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Flooding is the biggest risk to property or life in Kent County and Grand Rapids that is directly associated with climate change. Like most cities, development has occurred in low lying areas with flooding risk.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Figure 41 illustrates the low- and moderate-income neighborhoods at greatest risk from flooding events.

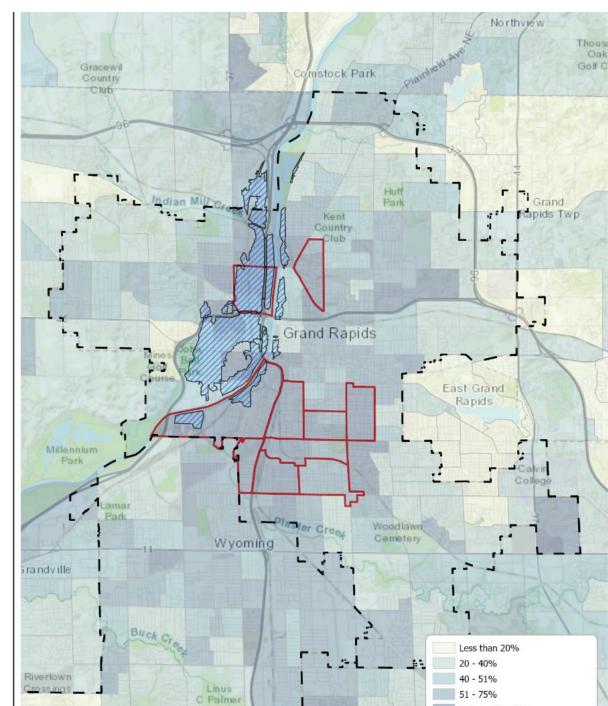
Oak

Greater than 75%

R/ECAP

Flood Hazard Area

Г



Flood Hazard Areas and Percent Low / Mod

Households

T

Figure 41: Flood Hazard Areas

Source: City of Grand Rapids, CPI

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The strategic plan outlines the participating jurisdiction's goals and strategies to utilize HUD entitlement funds, as well as leveraged funds, to address the needs and priorities determined through the planning process. The following outcomes were identified to meet these high-priority needs:

Outcome 1: Prevent and resolve episodes of homelessness. Support efforts to obtain or retain housing stability for individuals and families experiencing homelessness or at risk of homelessness. Activities include, but are not limited to, homelessness prevention and rapid re-housing.

Outcome 2: Improve access to and stability of affordable housing. Increase household stability and equitable access to housing. Activities include, but are not limited to, fair housing education and enforcement, housing-related legal assistance, down payment assistance, foreclosure intervention, and tenant-based rental assistance.

Outcome 3: Increase the supply of affordable housing. Increase the number of newly constructed and rehabilitated affordable rental and homeownership units available to low- and moderate-income households. Activities include, but are not limited to, infill new construction; conversion of vacant non-residential buildings to rental housing; rehabilitation and sale of single-family homes for first-time homebuyers; and development of permanent supportive housing for persons with disabilities, the chronically homeless, or other underserved populations.

Outcome 4: Improve the condition of existing housing. Support the maintenance, repair, and improvement of existing housing. Activities include, but are not limited to, housing rehabilitation, emergency and minor repairs, access modifications, lead-based paint remediation, code enforcement, and weatherization and energy efficiency improvements.

Outcome 5: Foster engaged, connected and resilient neighborhoods. Support actions that build relationships, lift resident voice, and enhance neighborhood stability. Activities include, but are not limited to, community organizing, education and referral services, and promoting equitable development.

Outcome 6: Improve community safety. Support efforts that enhance resident safety and quality of life in neighborhoods. Activities include, but are not limited to, crime prevention education and organizing, violence reduction strategies, and other services to ensure health and safety.

Outcome 7: Improve economic opportunity. Support equitable economic prosperity with an emphasis on improving financial and social capital. Activities include, but are not limited to, job readiness, skill development, training, and technical assistance for existing and new microenterprises, and supporting dedicated facilities and services for small business and entrepreneurial opportunities.

Outcome 8: Enhance neighborhood infrastructure. Improve physical infrastructure and create a sense of place in neighborhoods and neighborhood business corridors. Projects include, but are not limited to, parks and open space, streets and streetscapes, sidewalks, tree planting, and façade improvements.

Each jurisdiction within the regional consolidated plan will tailor individual activities in a manner that best fits their community while achieving one or more of the regional goals.

SP-10 Geographic Priorities – 91.215 (a)(1)

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction

Kent County and the cities of Grand Rapids and Wyoming will each invest their HUD entitlement resources in a manner that addresses the needs and priorities of low- and moderate-income residents identified through the planning process. Each jurisdiction will undertake efforts to leverage additional funds to maximize the impact of the federal entitlement funds. The basis for allocating resources is summarized below:

Kent County

Kent County will work with each of the 32 villages, cities and townships to identity projects and programs best suited to improve conditions of low- and moderate-income residents, within the framework of HUD regulations and guidelines. Kent County will solicit project ideas from interested jurisdictions and agencies.

Kent County / Wyoming HOME Consortium

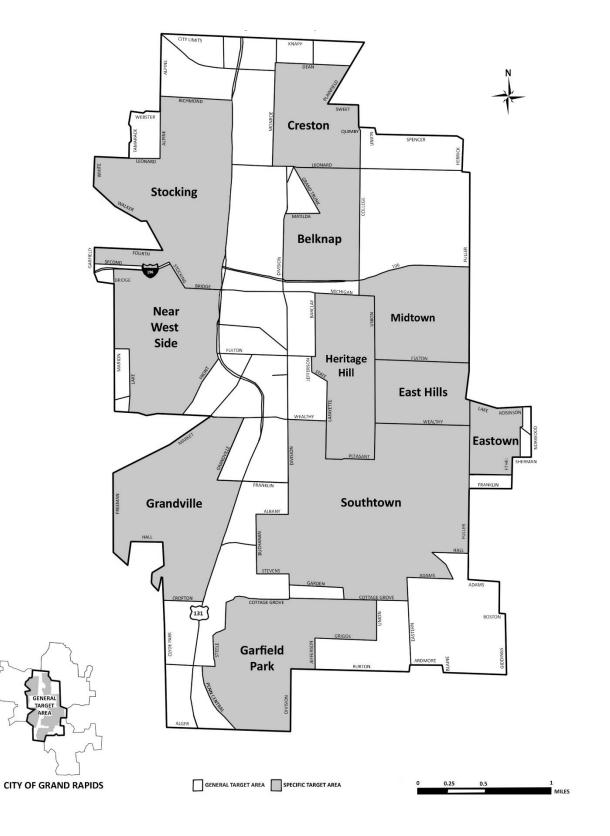
Kent County serves as the lead agency for the HOME Consortium to administer the program requirements. Kent County and the City of Wyoming will work to develop housing projects and activities consistent with the HOME regulations to provide additional housing opportunities for low- and moderate-income households, as well as improve the condition of existing housing stock in the County and City of Wyoming.

Grand Rapids

CDBG and HOME program funds must be used to support low- and moderate-income persons and neighborhoods. In order to maximize impact and address concentrations of need by low- and moderateincome households, the City implements the majority of its housing and community development activities in target areas. The General Target Area (GTA) includes a geographic area comprising much of central Grand Rapids, with access to a broad range of services, including housing programs and legal assistance. The GTA is identified using income and housing data, and the boundaries have been adjusted over time as new decennial Census data at the block group level becomes available.

Within the GTA, at least 51 percent of the residents have low- and moderate-incomes. Within the GTA are Specific Target Areas (STA). The STAs are residential neighborhoods where at least 55 percent of the residents are of low- and moderate-income. Residents of the STAs have access to neighborhood infrastructure improvements, concentrated code enforcement, and neighborhood association support. The majority of the City's housing and community development program funds are spent in these neighborhoods. The city implements certain programs and activities that promote the de-concentration of poverty. City-wide services are also available to income-eligible residents for major housing rehabilitation, handicap accessibility and minor home repairs. HOME and ESG funds may be used anywhere in the City to benefit income-eligible persons.

Figure 42: Grand Rapids Target Area Map



SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

The following needs were identified through the community planning process. The funding amount directed toward each need will be annually determined based on the allocation of federal entitlement funds and project availability.

Table 120: Priority Needs

Priority Need	Develop new affordable rer	ntal units	
Priority Level	Kent County (H)	Wyoming (H)	Grand Rapids (H)
Population	Extremely Low-Income hous	seholds	Large Families
	Low-Income households		Families with Children
	Moderate-Income househol	ds	Elderly
Associated Goals	Increase the supply of afford	dable housing	
Description		-	al housing is a key need and strategic outcome quality affordable housing is a significant
Basis for Relative Priority	Census estimates indicate there is a need for additional housing units for households earning less than 30% AMI. In addition, throughout the community engagement process, housing quality and affordability were noted as top priorities.		
Priority Need	Develop new affordable for	-sale homes	
Priority Level	Kent County (H)	Wyoming (H)	Grand Rapids (H)
Population	Extremely Low-Income hous	seholds	Large Families
	Low-Income households		Families with Children
	Moderate-Income househol	ds	Elderly
Associated Goals	Increase the supply of afford	dable housing	
Description	plan. As described through	out this plan, lack of	sale housing is a key need and strategic outcome quality affordable housing is a significant athway toward wealth building.
Basis for Relative Priority	Census estimates indicate there is a need for additional housing units for households earning less than 80% AMI. In addition, throughout the community engagement process, housing quality and affordability were noted as top priorities.		
Priority Need	Rehabilitation of Owner-Oc	cupied Units	
Priority Level	Kent County (H)	Wyoming (H) Grand Rapids (H)
Population	Extremely Low-Income hous	seholds	Large Families
	Low-Income households		Families with Children
	Moderate-Income househol	ds	Elderly
Associated Goals	Improve the condition of ex	isting housing	
Description	Improve the quality of the e or comprehensive rehabilitation		pied housing stock through emergency repairs
Basis for Relative Priority		-	ner-occupied substandard housing with one or ic engagement process indicated this is a high

Priority Need	Accessibility Modifications		
Priority Level	Kent County (H) G	rand Rapids ((H)
Population	Extremely Low-Income household	ds	Large Families
	Low-Income households		Families with Children
	Moderate-Income households		Elderly
Associated Goals	Improve the condition of existing housing		
Description	Provide accessibility improvements to low-and moderate-income households to improve accessibility, visibility, and quality of life for residents with mobility impairments.		
Basis for Relative Priority	Census estimates indicate a high number of owner-occupied substandard housing with one or more housing conditions. Additionally, the public engagement process indicated this is a high priority activity.		
Priority Need	Rental Rehabilitation		
Priority Level	Kent County (H) W	/yoming (H)	Grand Rapids (H)
Population	Extremely Low-Income household	ds	Large Families
	Low-Income households		Families with Children
	Moderate-Income households		Elderly
Associated Goals	Improve the condition of existing	housing	
Description	Renovate existing rental housing low- and moderate-income rente		s quality, affordability, and accessibility for
Basis for Relative Priority	Census estimates indicate a high number of renter-occupied substandard housing with one or more housing conditions. Additionally, the public engagement process indicated this is a high priority activity.		
Priority Need	Lead-based Paint Hazard Reduct	ion	
Priority Level	Kent County (H) W	/yoming (H)	Grand Rapids (H)
Population	Low- and Moderate-Income Hous	eholds with	Children under age 6
Associated Goals	Improve the condition of existing housing		
Description	_		based paint in homes with children under the households with children that have elevated
Basis for Relative Priority	Lead-based paint poisoning is an particularly among low-income h		alth risk in the Grand Rapids region,

Priority Need	Targeted Code Enforcement	_	
Priority Level	Kent County (H) Grand Rapids (H)		(H)
Population	Extremely Low-Income house	holds	Large Families
	Low-Income households		Families with Children
	Moderate-Income household	S	Elderly
Associated Goals	Improve the condition of exist	ting housing	
Description	Support housing and building code enforcement in targeted neighborhoods to help improve the condition of structures within the neighborhoods.		
Basis for Relative Priority	Census estimates indicate a high number of substandard housing with one or more housing conditions. Additionally, the public engagement process indicated this is a high priority activity.		
Priority Need	Parks and Playground Improv	vements	
Priority Level	Kent County (L)	Grand Rapids	(L)
Population	Extremely Low-Income house	holds	Large Families
	Low-Income households		Families with Children
	Moderate-Income households Elderly		Elderly
Associated Goals	Enhance neighborhood infrastructure		
Description	Improve the condition of existing neighborhood parks including playground equipment, splash pads, shelters and play fields in parks located in low- and moderate-income neighborhoods.		
Basis for Relative Priority	The public engagement process indicated this is a high priority activity. Additionally, quality parks are shown to improve the health of neighborhood residents and increase property values.		
Priority Need	Improve Access to Parks and	Open Space	
Priority Level	Kent County (H)	Grand Rapids	(Н)
Population	Extremely Low-Income house	holds	Large Families
	Low-Income households		Families with Children
	Moderate-Income household	S	Elderly
Associated Goals	Enhance neighborhood infras	tructure	
Description	Improve the access to neighborhood parks and open space for low- and moderate-income residents either through the construction of new parks or improving access by developing pedestrian and bike trails that connect neighborhoods.		
Basis for Relative Priority			is a high priority activity. Additionally, quality ghborhood residents and increase property

Priority Need	Neighborhood Infrastructure	Improvements	
Priority Level	Kent County (H)	Grand Rapids	(H)
Population	Extremely Low-Income house	nolds	Large Families
	Low-Income households		Families with Children
	Moderate-Income households		Elderly
Associated Goals	Enhance neighborhood infrast	ructure	
Description	Improve the conditions and accessibility of neighborhood public infrastructure including streets, alleys, and sidewalk in low- and moderate-income areas.		
Basis for Relative Priority	The public engagement proces	ss indicated this	is a high priority activity.
Priority Need	Home Purchase Assistance		
Priority Level	Kent County (H)	Wyoming (H)	Grand Rapids (H)
Population	Extremely Low-Income house	nolds	Large Families
	Low-Income households		Families with Children
	Moderate-Income households		Elderly
Associated Goals	Improve access to and stability	y of affordable h	ousing
Description	Provide assistance to homebu below 30% of income.	yers to purchase	e a home and keep their housing costs at or
Basis for Relative Priority	The public engagement process indicated this is a high priority activity. Additionally, homeownership is an avenue to grow household wealth.		
Priority Need	Housing and Financial Counse	ling Activities	
Priority Level	Kent County (L)	Grand Rapids	(L)
Population	Extremely Low-Income house	nolds	Large Families
	Low-Income households		Families with Children
	Moderate-Income households		Elderly
Associated Goals	Improve access to and stability	/ of affordable h	ousing
Description	counseling so they are prepare	ed to be success	income households to receive pre-purchase ful homeowners. Provide opportunities for eive financial literacy counseling.
Basis for Relative Priority	The public engagement proces	ss indicated this	is a medium priority activity.

Priority Need	Job Training and Workforce Developmen	t Programs	
Priority Level	Kent County (H) Grand Rag	bids (H)	
Population	Extremely Low-Income households	Large Families	
	Low-Income households	Families with Children	
	Moderate-Income households	Elderly	
Associated Goals	Improve economic opportunity		
Description	Programs that provide job training and skills development for unemployed or under employed low- and moderate-income individuals so they are better equipped to increase their earning potential.		
Basis for Relative Priority	The public engagement process indicated	this is a high priority activity.	
Priority Need	Improve High-Speed Broadband Access		
Priority Level	Kent County (H) Wyoming	(H) Grand Rapids (H)	
Population	Extremely Low-Income households	Large Families	
	Low-Income households	Families with Children	
	Moderate-Income households	Elderly	
Associated Goals	Improve economic opportunity		
Description	learn-from-home due to the pandemic ha	peed broadband access. Increases in work and ve shed additional light on the need to improve adband access to low- and moderate-income	
Basis for Relative Priority	The public engagement process indicated	this is a high priority activity.	
Priority Need	Small Business and Microenterprise Assis	stance	
Priority Level	Kent County (H) Grand Rag	bids (H)	
Population	Extremely Low-Income households	Moderate-Income households	
	Low-Income households		
Associated Goals	Improve economic opportunity		
Description	Financial and technical assistance for sma owned businesses.	Il businesses, including minority and women-	
Basis for Relative Priority	The public engagement process indicated	this is a high priority activity.	

Priority Need	Fair Housing and Legal Counseling Activities
Priority Level	Kent County (H) Wyoming (H) Grand Rapids (H)
Population	Extremely Low-Income households Moderate-Income households
	Low-Income households
Associated Goals	Improve access to and stability of affordable housing
Description	Fair Housing education and enforcement activities and legal counseling services for renters and homeowners
Basis for Relative Priority	The public engagement process indicated this is a high priority activity.
Priority Need	Poverty Reduction Activities
Priority Level	Kent County (H) Wyoming (H) Grand Rapids (H)
Population	Extremely Low-Income households Low-Income households
Associated Goals	Improve economic opportunity
Description	Activities and programs that help to reduce poverty and the effects of poverty among low and very low-income households.
Basis for Relative Priority	The public engagement process indicated this is a high priority activity.
Priority Need	Transportation Services
Priority Level	Kent County (H) Grand Rapids (H)
Population	Extremely Low-Income households Moderate-Income households
	Low-Income households
Associated Goals	Improve economic opportunity
Description	Transportation services to assist mobility challenged residents to access jobs and daily activities.
Basis for Relative Priority	The public engagement process indicated this is a high priority activity.
Priority Need	Permanent Supportive Housing
Priority Level	Kent County (H) Wyoming (H) Grand Rapids (H)
Population	Extremely Low-Income households Moderate-Income households
	Low-Income households
Associated Goals	Increase the supply of affordable housing
Description	New permanent supportive housing units for formerly homeless individuals.
Basis for Relative Priority	The public engagement process indicated this is a high priority activity. Additionally, the CoC has adopted a Housing First model, and additional PSH units are needed in the Grand Rapids / Kent County region.

Priority Need	Access to and Stability of Affordable Rental Housing	
Priority Level	Kent County (H) Grand Rapids (H)	
Population	Extremely Low-Income households Moderate-Income households	
	Low-Income households	
Associated Goals	Prevent and resolve episodes of homelessness	
Description	Increased opportunities for access to affordable rental housing and stability for low- and moderate-income persons, including those who are homeless and at-risk of homelessness, through programs such as tenant-based rental assistance and rapid re-housing.	
Basis for Relative Priority	The public engagement process indicated this is a high priority activity. Additionally, the CoC has adopted a Housing First model, and additional affordable housing units are needed in the Grand Rapids / Kent County region to reduce emergency shelter population.	
Priority Need	Prevention of Homelessness	
Priority Level	Kent County (H) Grand Rapids (H)	
Population	Extremely Low-Income households Moderate-Income households	
	Low-Income households	
Associated Goals	Prevent and resolve episodes of homelessness	
Description	Prevention of homelessness for persons at risk of immediate housing loss.	
Basis for Relative Priority	The public engagement process indicated this is a high priority activity.	
Priority Need	Engaged, Connected and Resilient Neighborhoods	
Priority Level	Kent County (M) Grand Rapids (M)	
Population	Extremely Low-Income households Moderate-Income households	
Associated Goals	Foster engaged, connected, and resilient neighborhoods	
Description	Supports actions that build relationships, lift resident voice, and enhance neighborhood stability.	
Basis for Relative Priority	The public engagement process indicated this is a medium priority activity.	
Priority Need	Community Safety	
Priority Level	Kent County (H) Grand Rapids (H)	
Population	Extremely Low-Income households Moderate-Income households	
	Low-Income households	
Associated Goals	Improve community safety	
Description	Activities that enhance resident safety and quality of life in neighborhoods.	
Basis for Relative Priority	The public engagement process indicated this is a high priority activity.	

SP-30 Influence of Market Conditions - 91.215 (b)

The need for additional affordable rental and for-sale housing has been well documented in this plan. Rents and home purchase prices are outpacing wage increases, and the job losses due to the pandemic have only accelerated these issues. Market pressures are increasing the number of households experiencing cost burdens and reducing the number households that can afford to purchase in the region or obtain rental units that meet the needs of their household.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type				
Tenant Based Rental Assistance (TBRA)	Rising rental rates, coupled with lack of available Housing Choice Vouchers, creates an environment where TBRA programs should be considered to help bolster the number of "vouchers" available to low- and moderate-income renter households.				
TBRA for Non- Homeless Special Needs	Non-homeless special needs households face similar issues as identified above. Many non-homeless special needs households have additional needs such has increased medical needs and transportation services, which can impact their ability to afford housing. Additional rental assistance would greatly benefit these populations.				
New Unit Production	The need for additional new housing units has been documented in the Housing Needs Assessment section of this plan. Additional new unit production should help address the lack of housing and affordable housing in general. At the very least, new housing units should reduce the escalating market pressures that are leading to rising rents and purchase prices.				
Rehabilitation	Housing stock in Grand Rapids, Wyoming and Kent County continues to age. Rehabilitation programs will extend the life span of these structures as well as reduce the operating costs through the addition of insulation and the replacement of windows, doors, and HVAC. Additionally, the age of the housing stock lends itself to higher instances of home health hazards such as mold, asbestos and lead-based paint. Comprehensive rehabilitation programs can reduce those household hazards and create healthier homes for the region's residents.				
Acquisition, including preservation	Market intervention efforts may be necessary to create new housing opportunities through the acquisition of existing vacant housing stock. Strategies such as acquiring vacant tax delinquent properties may be necessary to move markets in certain neighborhoods. Additionally, long- term affordability strategies should be explored such as land trusts or extended deed restrictions to preserve the affordability of units assisted with federal funds.				

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Kent County and the City of Grand Rapids each receive entitlement funding through the U.S. Department of Housing and Urban Development. The annual funding amounts vary slightly by year and are influenced by total program amounts appropriated by Congress and the number of new entitlement communities joining the programs. However, based on recent funding amounts the jurisdictions estimate receiving approximately \$40 million over the five-year program period. 2021 – 2025 Regional Consolidated Housing and Community Development Plan Strategic Plan Page 171

Т	Table 121: Anticipated Resources								
	Program	Source of Funds	Uses of Funds	E Annual Allocation: \$	Program Income: \$	nt Available Year Prior Year Resources: \$	1 Total: \$	Expected Amount Available Remainder of ConPlan \$	Narrative Description
					City of Grand	Rapids			
	CDBG	Federal	Admin and Planning, Acquisition, Blight Removal, Housing Rehabilitation, Homebuyer Assistance, Public Facilities, Public Infrastructure, Public Services	\$3,750,248	\$350,000	\$399,752	\$4,500,000	\$15,000,000	Entitlement funds to address housing, community and non- community development needs and priorities.
	HOME	Federal	Acquisition, rehabilitation and new construction of housing; homebuyer assistance; Tenant Based Rental Assistance	\$1,277,660	\$97,756	\$567,729	\$1,943,145	\$4,800,000	Entitlement funds to address housing development needs and priorities.
	ESG	Federal	Homeless prevention activities and rapid re- housing activities	\$321,764		\$36,185	\$357,949	\$1,280,000	Entitlement funds to assist homeless families and individuals and prevent homelessness among at-risk populations.

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								Page 172
Program	Source of Funds	Uses of Funds	Ex Annual Allocation: \$	pected Amoun Program Income: \$	t Available Year 1 Prior Year Resources: \$	Total: \$	Expected Amount Available Remainder of ConPlan \$	Narrative Description
Kent County								
CDBG	Federal	Admin and Planning, Acquisition, Blight Removal, Housing Rehabilitation, Homebuyer Assistance, Public Facilities, Public Infrastructure, Public Services	\$1,743,467	\$25,000	\$	1,768,467	\$6,900,000	Entitlement funds to address housing, community and non- community development needs and priorities.
ESG	Federal	Homeless prevention activities and emergency shelter operations	\$148,422			\$148,422	\$500,000	Entitlement funds to assist homeless families and individuals and prevent homelessness among at-risk populations.
			Kent County /	City of Wyomi	ng HOME Consorti	um		
HOME	Federal	Acquisition, rehabilitation and new construction of housing; homebuyer assistance; Tenant Based Rental Assistance	\$925,075	\$50,000	ç	\$975,075	\$3,600,000	Entitlement funds to address housing development needs and priorities.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

The jurisdictions leverage Federal resources against other sources of federal, state, local and private funding to maximize the impact of CDBG, HOME and ESG funds. Leveraging varies from activity to activity depending on the project scope. For instance, the Federal Low-Income Housing Tax Credit (LIHTC), Historic Tax Credits, and various affordable housing loan and grant products from the Federal Home Loan Bank can be leveraged with HOME funding to develop affordable housing. The jurisdictions routinely fund affordable housing and other activities for which partners bring additional resources.

The HOME program requires a 25% non-federal cash or non-cash match of the annual grant amount, less 10% for administration and 5% for CHDO operating support. Grand Rapids expects matching funds to come from non-cash resources such as property tax abatements granted to previously-funded HOME projects. The required ESG match will be provided by nonprofit organizations receiving the funds.

In Kent County's case, the match may be in the form of Low-Income Housing Tax Credits, state funded Medicaid services, volunteer labor and donated goods and services for HOME eligible projects located in its service area. As a rule, no County of Kent general fund dollars need be used to meet the match.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

Where available, surplus land owned by the jurisdictions or other quasi-public agencies will be evaluated for inclusion in the projects and activities identified in the plan on a case-by-case basis. Evaluation criteria includes the condition of the property, future anticipated needs, and current needs of the project or activities.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Grand Rapids	Government agency	Overall Administration	Grand Rapids
Kent County	Government agency	Overall Administration	Kent County
City of Wyoming	Government agency	HOME Consortium	City of Wyoming
Community Rebuilders	Nonprofit	Planning; Homelessness	Kent County
Dwelling Place of Grand Rapids Nonprofit Housing Corporation	CHDO	Affordable Housing	Kent County
Fair Housing Center of West Michigan	Nonprofit	Planning	Kent County
Genesis Nonprofit Housing Corporation	CHDO	Affordable Housing	Kent County
Grand Rapids Area Coalition to End Homelessness	Continuum of Care	Planning; Homelessness	Kent County
Grand Rapids Housing Commission	РНА	Affordable Housing	Grand Rapids and Kent County
Grand Rapids Neighborhood Associations	Nonprofit	Community Development	Grand Rapids
Grand Valley Metro Council	Regional Organization	Planning, Transportation	Kent County
Habitat for Humanity of Kent County	Nonprofit	Affordable Housing	Kent County
Healthy Homes Coalition of West Michigan	Nonprofit	Affordable Housing	Kent County
Home Repair Services of Kent County	Nonprofit	Affordable Housing	Kent County

 Table 122: Institutional Delivery Structure Summary

Deere an eikle Fretit	Responsible Entity	Dala	Page 175
Responsible Entity	Туре	Role	Geographic Area Served
ICCF Nonprofit Housing Corporation	CHDO	Affordable Housing	Kent County
Kent County Essential Needs Task Force	Regional Organization	Planning	Kent County
Kent County Health Department	Government agency	Affordable Housing	Kent County
Kent County Housing Commission	РНА	Affordable Housing	Kent County
Kent County Local Governments	Government agency / Subrecipient	Community Development	Kent County
Salvation Army	Nonprofit	Planning; Homelessness	Kent County
LINC UP	CHDO	Affordable Housing	Kent County
Rental Property Owners Association	Nonprofit	Affordable Housing	Kent County
Rockford Housing Commission	РНА	Affordable Housing	Rockford and a portion of Kent County
Wyoming Housing Commission	РНА	Affordable Housing	All of Wyoming and Kent County

Assess of Strengths and Gaps in the Institutional Delivery System

Kent County and the City of Grand Rapids have extensive experience in administering programs and delivering services identified as needs and priorities in this plan. The community is rich in non-profit and public agencies that serve these constituencies, and the cooperation and coordination is well established.

Strengths:

- The community has a large number of experienced housing and affordable housing developers with long track records of working with each jurisdiction.
- The non-profit community is strong and able to deliver the services in a comprehensive and impactful manner.
- Jurisdictional cooperation and coordination. Many regional initiatives are underway to address community challenges such as housing affordability, homelessness and child welfare.
- The Continuum of Care is a large collection of non-profit and public agencies that are dedicated to addressing the needs of the homeless community. These agencies have experience working together and are continually trying to improve service delivery to their clients.

Gaps:

- Public Transportation and Infrastructure. Focus group attendees noted transportation systems do not serve the entire county in a manner that provides access to all individuals; particularly those without a personal vehicle.
- The number of individuals residing in emergency shelters continues to increase, despite a housing-first approach.
- Language is a barrier for many families seeking assistance from various public agencies.
- Housing Choice Voucher availability and acceptance. Many respondents expressed frustration in the number of apartment owners unwilling to accept Section 8 vouchers. Additionally, a lack of Housing Choice Vouchers creates strains on many low-income households.
- Development capital. Affordable advocates felt new local capital funding models are needed to address the affordable housing shortage. The community cannot be reliant on federal or state programs to solve these community needs.
- Workforce development programs:
 - Focus group attendees indicated additional training opportunities or career coaching for clients is needed, with additional culturally competent staff who understand the various cultural needs and experiences of the clients.
 - Attendees felt client data sharing among agencies needs improvement so client performance and needs are better tracked and supported. Attendees felt improved data sharing would enhance client outreach and agency efforts would be more coordinated and efficient.
 - Attendees felt soft skills and workforce development programs should be better tailored to the individual's needs, and programs should allow more time with clients, rather than moving them from class to class over a 90-day period.
- Focus group attendees indicated many gaps exist to support and develop small businesses and entrepreneurs. Attendees felt it would be extremely helpful to have a list of trusted and culturally competent specialty vendors identified to help small businesses and entrepreneurs, such as accountants, computer specialists, etc. COVID-19 has highlighted this resource need as traditionally non-tech businesses were required to incorporate a technology layer not previously required. For example, restaurants now need a robust online way to order and deliver food, but the restaurant owner does not have the time or ability to undertake those changes.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

	Available in the	Targeted to	Targeted to People
	Community	Homeless	with HIV
	Homelessness Preventi	on Services	
Counseling/Advocacy	Х	Х	Х
Legal Assistance	Х	Х	
Mortgage Assistance	Х		
Rental Assistance	Х	Х	Х
Utilities Assistance	Х	Х	Х
	Street Outreach Se	ervices	
Law Enforcement	Х	Х	
Mobile Clinics	Х	Х	
Other Street Outreach Services	Х	Х	
	Supportive Serv	ices	
Alcohol & Drug Abuse	Х	Х	Х
Child Care	Х		
Education	Х	Х	
Employment and Employment Training	X		
Healthcare	Х	Х	Х
HIV/AIDS	Х	Х	Х
Life Skills	Х		
Mental Health Counseling	Х	Х	Х
Transportation	Х		

Table 123: Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The community has improved the delivery system over the years and moved to a coordinated approach. The current homeless delivery meets the needs of homeless persons by providing emergency shelter, transitional shelter, rapid-rehousing and permanent supportive housing options to individuals and families facing homelessness. Services are available that meet the needs of homeless individuals, unaccompanied youth, families with children and veterans.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above.

The coordinated entry system has improved the delivery of services for homeless individuals. Additional permanent supportive housing units have recently been constructed and more are in the planning stages. The CoC has shifted to a housing first model, with the goal of reducing the number of emergency shelter residents. That being said, there is still an over reliance on shelter beds to manage the homeless population and resources should be shifted to create additional permanent housing units.

<u>Provide a summary of the strategy for overcoming gaps in the institutional structure and service</u> <u>delivery system for carrying out a strategy to address priority needs.</u>

Strategies for overcoming gaps in the institutional structure and service delivery systems include:

- Additional coordination between public agencies and service delivery partners
- Development of new affordable rental housing units, including PSH units
- Improve transportation systems that connect low-income neighborhoods with job centers
- Continue to provide job training and job readiness programs
- Strengthen fair housing education and enforcement programs
- Support the modernization of public housing developments throughout Kent County
- Encourage mixed income neighborhoods and ensure new developments enhance neighborhoods and not put additional market pressure on rents and prices.

SP-45 Goals Summary - 91.215(a)(4)

Table 124: Goal S	Table 124: Goal Summaries																	
Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator											
Prevent and resolve	2021	2026	Homeless	Grand Rapids	Homeless Prevention	ESG: \$1,637,949 HOME: \$1,500,000	Homelessness Prevention: 375 persons Rapid Rehousing/Rental Assistance: 375 persons											
episodes of homelessness				Kent County	Homeless Prevention	ESG: \$648,422	Homelessness Prevention: 1,500 persons											
	Improve access to and stability	Commu Develop 2021 2026 Afforda Housing Non-Ho Commu	Non-Housing Community Development	Grand Rapids	Neighborhood Development	CDBG: \$3,000,000	Number of fair housing tests completed: 300 Number of individuals reached through fair housing or other legal education and outreach efforts: 3,000											
Improve access to and stability							Number of persons assisted through poverty reduction or public service activities: 1,000											
of affordable housing	2021		Affordable Housing	Grand Rapids	Housing Needs	HOME: \$793,145	Number of first-time homebuyers receiving assistance: 50											
liousing															Non-Housing Community Development	Kent County	Neighborhood Development	CDBG: \$700,000
			Affordable Housing	Kent County/ Wyoming	Housing Needs	HOME: \$500,000	Number of first-time homebuyers receiving assistance: 10											
		Affordable Housing					Number of new affordable rental units: 200											
Increase the supply of				Grand Rapids	Housing Needs	HOME: \$2,225,000	Number of new affordable for sale units: 20											
affordable	2021	2026					Number of permanent supportive housing units developed: 25											
			Affordable Housing	Kent County/ Wyoming	Housing Needs	HOME: \$1,500,000	Number of new affordable rental units: 50											

SP-45 Goals Summary - 91.215(a)(4)

Table 124: Goal Summaries

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
							Number of new affordable for sale units: 20
							Number of owner-occupied homes renovated: 2,000
			Affordable	Grand Rapids	Housing	HOME: \$2,225,000	Number of units receiving accessibility modifications: 50
Improve the condition of 2021	2021	2021 2026	Housing		Needs	CDBG: \$8,250,000	Number of rental units renovated: 100 Number of lead-based paint containing housing units addressed: 100
existing housing							Persons benefiting from code enforcement efforts: 20,000
			Affordable Housing	Kent County/ Wyoming	Neighborhood Development	CDBG: \$3,000,000 HOME: \$2,575,075	Number of rental units renovated: 100
							Number of owner-occupied homes renovated: 600
Enhance neighborhood infrastructure	2021		Non-Housing Community Development	Grand Rapids	Neighborhood Development	CDBG: \$2,250,000	Public facility or infrastructure activities: 8,000 persons assisted
		021 2026	Non-Housing Community Development	Kent County	Neighborhood Development	CDBG: \$2,968,467	Public facility or infrastructure activities: 50,000 persons assisted

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Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator	
							Number of individuals receiving job training or participating in a workforce development initiatives: 150	
			Economic Development	Grand Rapids	Economic Development	CDBG: \$2,000,000	Number small businesses assisted through loans or grants: 10	
Improve economic	2021	2026	Development		Development		Number of jobs created for low-and moderate-income residents: 50	
opportunity		2020					Number of persons assisted through transportation services: 200 persons	
			Economic Development	Kent County	Economic Development	CDBG: \$2,000,00	Number of persons assisted through transportation services: 1,000 persons	
Foster engaged, connected, and	2021	2021 2026 Commun		Non-Housing	Grand Rapids	Neighborhood	CDBG: \$2,000,000	Number of residents benefiting from neighborhood leadership development activities: 2,000
resilient 202 neighborhoods	2021		Development		Development	CDDC: \$2,000,000	Number of residents actively participating in neighborhood associations: 50,000	
Improve community safety	2021	2026	Non-Housing Community Development	Grand Rapids	Neighborhood Development	CDBG: \$2,000,000	Number of persons or households benefiting from targeted crime prevention activities: 30,000	

Table 125: Goal Descriptions

Outcome Name	Prevent and resolve episodes of homelessness
Outcome Description	Support efforts to obtain or retain housing stability for individuals and families experiencing homelessness or at risk of homelessness. Activities include, but are not limited to, homelessness prevention and rapid re-housing.
Outcome Name	Improve access to and stability of affordable housing
Outcome Description	Increase household stability and equitable access to housing. Activities include, but are not limited to, fair housing education and enforcement, housing-related legal assistance, down payment assistance, foreclosure intervention, and tenant-based rental assistance.
Outcome Name	Increase the supply of affordable housing
Outcome Description	Increase the number of newly constructed and rehabilitated affordable rental and homeownership units available to low- and moderate-income households. Activities include, but are not limited to, infill new construction; conversion of vacant non-residential buildings to rental housing; rehabilitation and sale of single-family homes for first-time homebuyers; and development of permanent supportive housing for persons with disabilities, the chronically homeless, or other underserved populations.
Outcome Name	Improve the condition of existing housing
Outcome Description	Support the maintenance, repair, and improvement of existing housing. Activities include, but are not limited to, housing rehabilitation, emergency and minor repairs, access modifications, lead-based paint remediation, code enforcement, and weatherization and energy efficiency improvements.
Outcome Name	Foster engaged, connected and resilient neighborhoods
Outcome Description	Support actions that build relationships, lift resident voice, and enhance neighborhood stability. Activities include, but are not limited to, community organizing, education and referral services, and promote equitable development.
Outcome Name	Improve community safety
Outcome Description	Support efforts that enhance resident safety and quality of life in neighborhoods. Activities include, but are not limited to, crime prevention education and organizing, violence reduction strategies, and other services to ensure health and safety.

Outcome Name	Improve economic opportunity
Outcome Description	Support equitable economic prosperity with an emphasis on improving financial and social capital. Activities include, but are not limited to, job readiness, skill development, training, and technical assistance for existing and new microenterprises, and supporting dedicated facilities and services for small business and entrepreneurial opportunities.
Outcome Name	Enhance neighborhood infrastructure
Outcome Description	Improve physical infrastructure and create a sense of place in neighborhoods and neighborhood business corridors. Projects include, but are not limited to, parks and open space, streets and streetscapes, sidewalks, tree planting, and façade

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Grand Rapids and the Kent County/Wyoming HOME Consortium will continue to develop or rehabilitate housing that will be made available to extremely low-income, low-income and moderate-income households:

- Grand Rapids: 2,000 households
- Kent County: 550 households
- Wyoming: 350 households

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

<u>Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary</u> <u>Compliance Agreement)</u>

None of the PHA's are under a Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvement

Each of the housing commissions desire to promote residential involvement within their housing developments, in their neighborhoods, and in their communities.

Kent County Housing Commission

The Kent County Housing Commission provides rental assistance to extremely low- and very low-income families. The Commission issues and administers Section 8 Housing Choice Rental Assistance Vouchers. Commission staff educates and prepares applicants, assists voucher holders with locating suitable housing, inspects rental units and reviews lease agreements. It also provides education about the need for affordable housing to property owners and communities and works collaboratively with other housing providers in Kent County.

Grand Rapids Housing Commission

To increase resident involvement and provide additional resident resources the housing commission plans to:

- Seek funding for Resident Service Coordinators to support the expansion of the Family Self-Sufficiency Program.
- Continue to implement on-site self-sufficiency programs at Campau Commons and Creston Plaza family housing developments.
- Continue to provide case management and other supportive services to increase self-sufficiency for families, empower the disabled to live independently and enable the elderly to age in place.
- Continue to work with community partners to provide case management services to GRHC residents.
- Leverage community partnerships to gain social work interns and supportive community volunteers, and to maximize the accessibility and effectiveness of community resources available to participants in Grand Rapids Housing Commission programs.
- Foster strong community partnerships by continuing an annual program that publicly recognizes outstanding partner contributions to Grand Rapids Housing Commission programs and services.
- Hold quarterly meetings and support the Resident Advisory Board to ensure commission-wide representation.

Wyoming Housing Commission

The Wyoming Housing Commission plans to:

- Continue to support families in their goal to obtain homeownership.
- Increase participation within the Family Self-Sufficiency Program to at least 125 residents.
- Support families receiving Housing Choice Vouchers through outreach and communication.

• Continue to partner with housing developers to create additional affordable housing opportunities.

Is the public housing agency designated as troubled under 24 CFR part 902? None of the PHA's are designated as troubled.

<u>Plan to remove the 'troubled' designation</u> N/A

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Barriers to affordable housing can include market forces, and public or private policies. Market barriers to affordable housing is largely the gap between the high cost of land and construction, versus the need to keep rents and sales prices affordable. Public policy barriers to affordable housing can include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment. Private barriers to affordable housing include local resident opposition new construction, and more likely private sector lending practices.

During the community engagement, many stakeholders discussed the needs of affordable housing throughout the county and Grand Rapids. Most respondents felt the rural villages and townships also felt pressure to increase the availability of affordable housing supplies. Kent County and Grand Rapids have purposefully been engaged in reducing barriers to affordable housing over the past decade.

The most common public sector barriers are due to overly restrictive zoning practices such as limiting the number of unrelated persons living as a household, overly large minimum lot or building sizes, and the lack of diverse housing types permitted in each zoning district.

In 2015, Grand Rapids began focusing on ways to encourage affordable housing development through a process called the Great Housing Strategies. This planning effort made a number of positive changes to the Grand Rapids zoning ordinance to encourage affordable housing development including reducing minimum lot widths, allowing micro-units, and reducing the development requirements for attached single-family homes.

An effort titled Housing NOW! made additional zoning recommendations intended to reduce the barriers to developing housing. Those changes included:

- Eliminating lot area requirements of 20,000 square feet
- Reducing minimum dwelling unit width from 18' to 14'
- Reducing barriers to construct Accessory Dwelling Units

A number of property tax policies exist to encourage the development of affordable housing and to limit the effects of rising property values on low-income residents. In the City of Grand Rapids, qualified federal or state assisted low-income housing developments are exempt from property tax assessments. Housing projects approved for such an exemption make Payment in Lieu of Taxes (PILOT) for the rent restricted units by paying one of the following:

- 1. A service charge in an amount equal to 4% of annual shelter rent, or
- 2. A service charge in an amount equal to 1% of annual shelter rent in addition to making an annual contribution into the City's Affordable Housing Fund in an amount equal to 4% of annual shelter rent.

PILOT reduces operating costs and helps units to remain affordable.

During focus group discussions with affordable housing developers and advocates, they expressed frustration that not all Kent County jurisdictions participated or authorized PILOT programs for affordable housing developments. The affordable housing advocates and developers felt that increased

PILOT utilization would expand the amount of affordable housing developments in Kent County, and also allow LIHTC applications to score better in the rural areas, not just in and near downtown Grand Rapids.

Additionally, state law permits other tax relief mechanisms for low-income residents, this includes:

- Real Property Poverty Exemption Program. This allows very low-income residents to be exempt from property tax obligations if they meet certain poverty income guidelines and demonstrate they cannot afford the tax liability.
- Property Tax Deferments. This is a temporary deferment of payments while a household is experiencing a financial hardship.
- Nonprofit Housing Tax Exemption. This is a temporary exemption designed to lower the costs of developing affordable housing by non-profit agencies. This exemption is up to three years, or when the property transfers to a new low-income tenant or owner.

In addition to barriers of affordable housing, the 2021-2025 Assessment of Impediments to Fair Housing Choice identified the following impediments:

- 1. **Disparity in access to affordable housing throughout Kent County**. Analysis of census data, focus group discussions, and survey results indicate a need to improve the quality of existing housing and expand access to affordable housing throughout the county.
- 2. Unequal access to opportunities. Unequal access to opportunities, including employment, housing and education exist in Grand Rapids and Kent County. Equitable efforts should be undertaken to bridge the gaps in access and opportunity such as workforce and small business development programs to combat high young adult unemployment rates and wage disparities between Black and White and Hispanic and White workers and support systems for women to enter and stay in the workforce. An enhanced focus on increasing Black and Hispanic homeownership and growing disadvantaged businesses will help bridge the wealth gap between white and non-white householders
- 3. **Segregated Living Patterns.** Historic redlining and blockbusting practices, along with housing and transportation policies, have created segregated living patterns in Grand Rapids and Kent County. Efforts should be strengthened to ensure countywide distribution of affordable housing, improve access to transportation, increase homeownership in minority communities, and improve the utilization and acceptance of the Housing Choice Voucher program.
- 4. Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). Efforts should provide meaningful transformation in R/ECAP neighborhoods to increase household income of existing residents through better access to jobs, transportation and/or education. Scaling minority-owned businesses in racially and ethnically concentrated neighborhoods can also play a role in transforming hyper-segregated communities and creating jobs in disadvantaged neighborhoods.
- 5. Limited enforcement of civil rights and lack of resources to ensure fair housing compliance. Grand Rapids and Kent County should take steps to strengthen and improve their civil rights and fair housing protections by changing local ordinances, strengthening the role of departments

fair housing testing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Building on a foundation of past studies, The *Grand Rapids Housing Needs and Opportunities, 2020* report recommended the following strategies to encourage affordable and market-rate housing:

- 1) Preserve existing affordable housing whenever possible. Efforts should be undertaken to preserve existing subsidized housing that are nearing their final compliance date and are in danger of being converted to market-rate housing.
- 2) Support tenant-based rental assistance and eviction prevention measures. While the Grand Rapids has a source of projection ordinance, it can be difficult to enforce. The report recommends engaging in national education and advocacy efforts to increase annual federal spending for Housing Choice Vouchers, ESG and HOME grants. Increased code enforcement pertaining to source of income discrimination claims, and coordinated dialog with regional foundations to support local tenant-based rental assistance and eviction prevention programs.
- **3)** Leverage City-owned property to support new housing supply. Wherever appropriate, publicly Wherever appropriate, publicly-owned parcels that are determined to be ready for redevelopment should be assigned to the Brownfield Redevelopment Authority or similar agency to pursue a development strategy in partnership with a non-profit or for-profit developer. Additionally, support additional LIHTC housing in appropriate areas, and mixed-income financing in Neighborhoods of Focus.
- 4) Deep community engagement. Many local leaders, neighborhood groups and affordable housing advocates have expressed reticence toward new zoning provisions that would allow more housing in their neighborhoods. Early conversations should be focused in neighborhoods closest to downtown, high frequency transit corridors, the river, and traditional business districts. These neighborhoods will be in the greatest demand over the next five years and will be most likely to see dramatic price increases.
- 5) Re-calibrate economic development incentives to support more affordability. Local economic development incentives are a critical ingredient to ensure that an adequate supply of new housing can be produced over the next five years. The use of tax incentives designed to make new projects financially feasible is imperative. The report recommends the Economic Development team continue to communicate proactively with developers about priorities to support more affordable housing options with the expectation that the availability of local incentives will become dependent upon a specific guarantee of affordability in the future.
- 6) Begin work to create a dedicated source of funding for housing. The City of Grand Rapids has been a highly dynamic, urban real estate market for most of the last decade, with a strong demand for more infill housing at all price points. All research to-date indicates that a dedicated source of consistent funding which is scaled appropriately to the size of the

housing need will be critical to achieve meaningful progress. A dedicated source of funding for housing is necessary because the existing limited federal resources are insufficient to address the housing needs of the community.

The report also identifies the following mid-term implementation strategies:

- Adopt an Inclusive Housing Plan (5-year and 10-year goals). Develop and adopt an inclusive housing plan that outlines reasonable housing development goals across each city neighborhood.
- 2) Allow for more housing in every neighborhood. The report recommended adjusting various development codes to allow additional density in neighborhoods. Examples include accommodating a second dwelling unit, by-right, in certain zoning districts, so long as one of the units is preserved as affordable; allowing larger lots to be subdivided into two parcels; and reducing regulatory barriers to three or more units on properly sized lots or corner parcels with the condition that at least one unit remains affordable at 60% AMI or below.
- 3) Establish dedicated revenue and grow Affordable Housing Fund. The City of Grand Rapids will need a minimum \$20 -\$25 million fund to support housing needs over the next 5 years. Up to 75% of that fund can be targeted as low-interest revolving loans to fill equity, credit and debt financing gaps. At least 25% of the fund should be planned as grant or direct subsidy for the lowest income households. Under some circumstances it may prove more expedient for the fund to support direct giving from donors to local non-profits.
- 4) Ensure access to capital for homeowners and small-scale developers. All of the city's population must be able to share in the wealth creation that results from new housing development. This may require a soft lending source to support down payment assistance and collateral support to ensure all interested parties are able to secure adequate financing. As demand for a scarce amount of property continues to rise in the City of Grand Rapids, there is a limited set of tools available to ensure that BIPOC residents and business owners have equal access to opportunity to share in that wealth creation. A critical step toward ensuring an equitable distribution of both housing and opportunities for wealth creation is to be very intentional about providing access to capital for Black, Indigenous and People of Color.
- 5) Establish and staff a central redevelopment authority. The report recommends consideration be given to utilizing the brownfield redevelopment authority or land bank fast track authority to execute this work. Close working relationships with entities such as the Housing Commission, the Affordable Housing Fund and other agencies are critical to proper planning and execution of desired neighborhood goals.
- 6) Implement gap-financing programs where market forces are failing. The report acknowledges land and construction costs are high and therefore tax incentives are still necessary to support market-rate housing, and recommends those incentives could be conditioned upon the preservation of specific rent levels for a defined period of time (i.e. 80% AMI rents for 20 years) on a share of the overall unit mix. As neighborhood amenities (retail, parks, schools, transit, museums, etc.) improve to meet demand, local economic

incentives should be reduced and eventually should become unnecessary to support true market-rate housing.

- 7) Catalyze market rate housing downtown and along transit corridors (alongside affordable housing). New market rate housing will not result in a direct correlation to more affordable units in the short-term. However, the more developers are able to respond to demands for market rate housing, the less upward pressure there is on the price of existing naturally occurring affordable housing. The report emphasizes that market rate housing must be carefully balanced with the preservation of existing affordable housing, but the importance of new housing cannot be over-stated. A particular focus on additional market-rate housing in downtown Grand Rapids and along high frequency transit corridors is recommended.
- 8) Regional collaboration. The report recommends numerous opportunities for regional collaboration to spur housing development including expansion of the Payment in Lieu of Tax program, advocating changes in state law to broaden tax exemption incentives for smaller developments, city landbanks, and expanding the TIF program to provide gap financing for housing development.

Based on the community input and the results of the 2021-2025 Assessment of Impediments to Fair Housing Choice, the following strategies should be undertaken to reduce barriers to affordable housing:

- 1. Continue to support lead abatement and safety initiatives
- 2. Enhance and improve landlord education and outreach on the Housing Choice Voucher program and improve Housing Choice Voucher utilization and acceptance
- 3. Advocate for a balanced urban/rural scoring system in future QAP years.
- 4. Continue to support initiatives that ensure access to housing for persons with disability with a focus on individuals with physical and mental health disabilities including incentivizing developers going beyond the minimum standard to include visitability in the design of new housing.
- 5. Leverage City and County influence and partner with the National Community Reinvestment Coalition (NCRC) to address lending disparities by developing community benefit agreements with financial institutions that include negotiating products that address the unique mortgage lending needs of Grand Rapids and Kent County.
- 6. Develop strategy for more equitable distribution of LIHTC, public housing and multi-family assisted developments throughout the county.
- 7. Proactively engage the owners of expiring Section 8 properties and advocate for their continuance in the program. This strategy may also include working with the owner to provide additional subsidy funds to renovate the units if the development has low REAC scores.
- 8. Continue to explore countywide fair housing ordinance and expand Source of Income protections throughout Kent County.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Grand Rapids Area Coalition to End Homelessness has a coordinated entry system that assesses each individual and family's need and connects them with the appropriate resource, either rapid rehousing or emergency housing. Street outreach is coordinated through the coalition and involves case workers and police officers who are trained on appropriate outreach tactics and connects those homeless individuals to the coordinated entry system.

Addressing the emergency and transitional housing needs of homeless persons

There are significant emergency shelter beds and transitional housing resources in the Kent County region. The coordinated entry system allows agencies to assess the housing needs of the homeless persons and make the appropriate placement based on their housing needs. Community resources include emergency shelter beds, transitional housing and rapid-rehousing beds, and permanent supportive housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The CoC has a housing first policy to place individuals and families into permanent housing rather than emergency shelter beds or transitional units. Through the action of agency staff, the appropriate referrals and placements are made into permanent housing. Focus group participants indicated additional housing vouchers and permanent housing units are necessary to fully transition individuals and families to permanent housing.

Help low-income individuals and families avoid becoming homeless, especially extremely lowincome individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

All relevant agencies and institutions are members of the CoC and use a coordinated approach when discharging patients or individuals. All efforts are taken to ensure the housing needs of individuals and families are met prior to exiting from any publicly funded institution or healthcare system.

The State Mental Health Code (Section 330.1209b) requires the community mental health program to produce a written plan for community placement and aftercare services, ensuring patients are not discharged into homelessness, including McKinney-Vento programs. The written plan must identify strategies for ensuring recipients have access to needed and available supports identified through a needs assessment. Service providers adhere to state and local requirements.

The Michigan Department of Corrections identifies stable housing as a critical need for the successful reentry of released prisoners. Staff from the County correctional facility and the Coalition's central intake created a protocol for homeless persons who enter and exit the corrections system. Staff from the Coalition attend Reentry Steering Committee meetings, which ensures a linkage between the two systems.

The CoC has made working with other systems to prevent homelessness a priority. This includes:

- Working with Prisoner Reentry to improve permanent housing outcomes within the Department of Corrections Prisoner Reentry program. Coalition staff will increase access to Housing First practices to support permanent housing outcomes for reentry population.
- Reducing homelessness for persons exiting foster care. The CoC will increase coordination between foster care and homeless service providers to ensure transition plans are sustainable for youth and prevent homelessness after benefits expire.
- Making housing plan assistance training available to discharge planners across systems. Staff will provide housing planning assistance training for providers planning discharge for consumers from medical, mental health, foster care, and reentry systems.

SP-65 Lead based paint Hazards - 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

In their efforts to address lead-based paint hazards, Kent County and the City of Grand Rapids adhere to the environmental review policies established under the National Environmental Protection Act (NEPA) on all rehabilitation projects. Lead hazard evaluation and reduction activities are integrated into all HOME and CDBG housing rehabilitation programs. Properties built before 1978 are required to undergo lead testing and abatement when rehabilitation thresholds are met, and testing indicates contamination.

In order to address the most common sources of childhood exposure to lead which are deteriorated lead-based paint and lead contaminated dust and soil, the City of Grand Rapids operates a Lead Hazard Control Program. Since September of 2003, the City has received eight competitive grants from HUD's Office of Healthy Homes and Lead Hazard Control totaling approximately \$23 million. During this time, the program made more than 1,700 homes lead safe. This has been accomplished in partnership with the Kent County Health Department and non-profit agencies, the Healthy Homes Coalition, the Rental Property Owners Association, and LINC Up Nonprofit Housing Corporation.

The City of Grand Rapids will also continue to partner with the Kent County Health Department on the CHIP Lead Hazard Control Community Development Program. The first program grant award was secured in 2017, with local program operation beginning in 2018. As of June 30, 2020, lead hazards have been abated in a total of 32 homes occupied by Medicaid-enrolled children with the highest blood lead levels in Kent County. This resource is coordinated with the City's Lead-Based Paint Hazard Control program and other HUD resources for maximum impact.

The City will continue to pursue this and other funding opportunities for lead-based paint hazard remediation in the next five years in continued partnership with the Kent County Health Department and other agencies.

Both national studies and local experience has shown that rental units have a higher prevalence of leadbased paint hazards when compared to owner-occupied units. Kent County's HOME Investment Partnership programs will address this issue by rehabilitating older properties and creating affordable rental and for-sale units that are safe for occupancy and free of lead paint hazards for low- and moderate-income households. There is a strong network of organizations in Kent County that work together effectively to address childhood lead poisoning and other children's environmental health issues related to housing. These partnerships were forged through the Get the Lead Out! collaborative more than fifteen years ago and continue today. Partners also refer families and rental property owners to the City of Grand Rapids' HUD-funded Lead Hazard Control program. The Childhood Lead Poisoning Prevention Program at the Kent County Health Department provides case management, prevention and outreach, surveillance and enforcement of County Housing Regulations, and coordination of the blood lead testing program in County clinics through WIC. The local Healthy Homes Coalition, a non-profit organization, continues to facilitate collaborative work in this area and provides direct services that include assessing children's homes for health hazards and linking families to resources for hazard mitigation. While lead poisoning is central to this work, there is a growing emphasis and engagement of new partners on the problem of asthma triggers in children's homes. New partners include local hospitals, health care providers, payment programs, and education.

How are the actions listed above related to the extent of lead poisoning and hazards?

As discussed in the housing needs and market analysis, there are a significant number of homes constructed prior to 1978 and many low- and moderate-income children reside in these homes. They are at the greatest disadvantage to suffer the effects of lead-based paint poisoning.

Between 2014 and 2016, the number of lead-poisoned children increased. To combat this increase Kent County and Grand Rapids aggressively sought funding and reconfigured program requirements to make it less costly for homeowners and landlords to reduce lead paint hazards. The increased funding and improved program requirements reduced lead hazards and reduced childhood lead poisoning.

While the region has made progress, the number of children screened with elevated blood lead levels (BLL) remained high. In 2018, 11,038 children aged 6 and under were screened for BLL, and 340 had elevated BLL's. Over 300 of those children lived in Grand Rapids.

In February 2020, the Kent County Lead Action Team (LAT) was created. The LAT will take on the recommendations from previous partnerships and work to end lead exposure in Kent County.

The Chair of the Kent County Board of Commissioners, Mandy Bolter, and the Mayor of the City of Grand Rapids, Rosalynn Bliss, are co-sponsoring the LAT. Kent County Health Department Administrative Health Officer, Dr. Adam London, is facilitating the group. The steering committee and workgroups are made up of leaders and experts from throughout the community.

The LAT has the following goals:

- Reduce elevated blood lead level rates throughout the county.
- Increase case management of lead poisoned children to ensure that their blood lead levels fall below action levels within six months.
- Implement environmental risk reduction, including communication, inspection, counseling, mitigation, and/or abatement at all addresses which have been prioritized due to multiple cases of elevated blood lead, blood lead levels in excess of 10 micrograms/deciliter, or other criteria established by the Lead Action Team.

• Provide social supports, such as short-term housing, for the people affected by lead to ensure that they have the resources needed to successfully handle their lead crisis.

How are the actions listed above integrated into housing policies and procedures?

All residential units constructed before 1978 are evaluated for the presence of lead-based paint hazards. Based on the assessment results the appropriate abatement procedures are followed to create additional lead-safe homes. Kent County and Grand Rapids have incorporated policies in their housing and community development programs to properly evaluate and assess the presence of lead-based paint in any housing rehabilitation project.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The Kent County Essential Needs Task Force (ENTF) was formed in 1982 as a response to the struggles facing Kent County residents in meeting their basic needs. The ENTF focuses on system change with an emphasis on collective impact and the interconnectedness of all systems. The committees of the ENTF are an evolving reflection of those basic needs that the community has deemed essential to the success of its citizens.

Those committees, as they exist today, are:

- Grand Rapids Area Coalition to End Homelessness (also known as the Kent County Continuum of Care)
- Energy Efficiency
- Food and Nutrition Coalition
- Economic and Workforce Development
- Transportation

Each of these committees works to ensure that the vision, mission, and goals of the ENTF are being carried out through their efforts. The ENTF is charged with the overall coordination across Kent County, including Grand Rapids, to end poverty and ensure people's basic needs are met.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

Many of the goals in this plan align with the poverty reduction strategies undertaken through the ENTF. These goals include increasing the median household income of residents and families, through job training, workforce development and better access to employment. Additionally, the housing goals outlined in this plan are focused on increasing access and affordability to low- and moderate-income residents.

The coordination of the goal of the ENTF and this plan will occur though City and County staff and implementing agencies who sit on the various steering and subcommittees of the ENTF and CoC. Activities funded through this plan will align with the larger community efforts to reduce poverty throughout Kent County.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

Kent County Monitoring Standards and Procedures

Kent County monitoring efforts are directed toward financial performance and program/project performance. The purpose of monitoring activities is to:

- 1. Ensure compliance with federal regulations and contract requirements.
- 2. Ensure timely expenditure of grant funds.
- 3. Track CDBG service and project performances.
- 4. Identify necessary assistance.

Monitoring Plan/Schedule

A yearly on-site monitoring schedule for CDBG Services is set by Kent County Community Development staff and documented in a monitoring calendar. Local units of government (LUOG) projects being assisted with CDBG funds will be monitored after the "notice to proceed" has been issued. Kent County Community Development staff will perform a yearly on-site monitoring visit on each service organization to verify that the subrecipient is operating in accordance with the contract and applicable regulations as well as to ensure that the service files contain all the required documentation.

Kent County Community Development staff will perform an on-going review of each LUOG project assisted with CDBG funds to verify that the subrecipient is operating in accordance with the contract and applicable regulations as well as to ensure that the project files contain all of the required documentation.

Pre-Monitoring Activities

Risk Assessment

- 1. Kent County Community Development Department will send a Risk Assessment Questionnaire to all CDBG Subrecipients receiving funds for services.
- 2. Kent County Community Development Department will use this questionnaire to determine the level of monitoring necessary for each organization.

Subrecipient Notification

- 1. Kent County Community Development Department will contact the Service Organization or contractor by phone or email at least seven working days prior to a scheduled on-site visit.
- 2. Kent County Community Development Department will send a Notification Letter to the Service Organization at least 14 days prior to the on-site visit.

Desk Audit

Kent County will review all applicable records internally before conducting an on-site monitoring visit. These documents include:

- 1. Project Proposal
- 2. Contract
- 3. Invoices/request for payment/general ledger transactions
- 4. Monthly or quarterly reports as required by contract
- 5. Draw sheets
- 6. Correspondence, if any
- 7. Prior Monitoring reports
- 8. Single Audit

On-Site Monitoring Activities

Kent County Community Development Department will perform a structured review at the location where project/program activities are carried out.

On-Site Process

- Introduction Staff will meet the Program Manager and provide an introduction as a representative of Kent County Community Development. Discuss scope, purpose, and schedule of visit. Explain that this activity is being funded through the Community Development Block Grant and as such must be monitored for appropriate use of funds and adherence to HUD regulations.
- 2. Documentation, data gathering, and analysis Document findings in note form or on the CDBG Subrecipient checklist. Gather any data requested on the notification letter. Review and analyze any applicable program and financial data on site. Interview and observe applicable staff.
- 3. Exit Conference (services only) with key subrecipient representatives to:
 - Present preliminary results of the monitoring visit
 - Provide opportunity for subrecipient to correct misconceptions or misunderstandings
 - Secure additional information from subrecipient to clarify/support their position
 - Allow subrecipient to report any steps or progress to correct the agreed-upon deficiencies

Post Monitoring Activities

Notes from the exit conference, or a preliminary letter/report may be provided to the subrecipient/contractor via email within a few days of the on-site monitoring visit. This can allow the subrecipient/contractor to provide missing documentation or to resolve minor issues before the Initial Determination Letter is sent.

Letter/Report Guidelines

Determination Letters should:

- 1. Contain Findings (with Corrective Actions) and/or Concerns (with Recommendations)
- 2. If no Findings or Concerns exist Subrecipient should be given formal recognition of a successful program

- 3. Sent to subrecipients within 60 working days of the on-site monitoring visit. The letter requests a response within 60 working days. Note: Depending on the nature and number of Findings, sub recipients may be granted additional time to respond. A request for an extension must be submitted in writing prior to the response deadline stated in their Initial Monitoring Letter.
- 4. All monitoring letters must be reviewed and approved by a manager or the director before they are sent to the subrecipient.
- 5. All monitoring letters must be sent with a signed copy of the monitoring checklist.
- 6. All correspondence becomes a permanent, written record in the subrecipient's project or monitoring file.

HOME Monitoring Procedures

As the lead agency in the HOME program, Kent County Community Development Department assumes lead responsibility for ensuring compliance of all HOME program activities. To that end, the following are monitoring activities and responsibilities of the Community Development Department as the lead agency.

For any HOME activity, compliance review can occur at up to four stages in the process:

At time of project selection and approval: The applicable subrecipient/subgrantee is responsible for assembling all required information and submitting it to Community Development Department, subsequent to commitment of funds;

During implementation, construction and disbursement: In addition to routine Kent County HOME program monitoring of HOME-funded projects, the applicable subrecipient/subgrantee is responsible for monitoring implementation of the project, including construction monitoring, and for certifying and documenting compliance;

Upon project completion: Recapture of HOME funds under the Kent County HOME Program guidelines may be required (refer to the HOME Program narrative section in the Kent County Annual Action Plan); and

If rental units are assisted, ongoing compliance monitoring will occur annually in compliance with the requirements at 24 CFR 92.252 and 92.504(d) for on-site inspections. All HOME compliance issues will be reviewed at one or more of these stages.

Grand Rapids Monitoring Standards and Procedures

The Community Development Department monitors all subrecipients receiving Community Development Block Grant (CDBG), Home Investment Partnerships (HOME) Program and Emergency Solutions Grants Program (ESG) funds. Subrecipients are certified annually, including review of the articles of incorporation, bylaws, and tax and insurance documentation. When an organization has expended more than \$750,000 in federal funds during its fiscal year, an agency single audit is also required. Written agreements between the City and subrecipients identify activities to be performed and measures of success, as well as specific federal and local program requirements. Program/Project monitoring is composed of three components: financial reporting, performance reporting and an on-site monitoring review.

1. Financial Reporting. Financial reports are submitted on a monthly or quarterly basis. The financial reports provide information regarding actual program expenditures. These expenditures are reviewed by the Community Development Department to determine if the expenditures are within the approved budget, if they support contractual activities, and if costs are eligible.

2. Performance Reporting. Performance reports are submitted on an annual, semi-annual, or quarterly basis and are used to provide the Community Development Department with a tool to measure a program's progress in providing contracted services.

3. On-Site Monitoring. Staff conduct ongoing desk audits of subrecipient contract files. Annually, a determination is made whether an expanded monitoring review is necessary. This determination is based on prior findings that remain open, closed findings that need to be verified, outstanding independent audit, performance reporting issues, fiscal issues and/or other appropriate areas that warrant additional monitoring. If it is determined that an expanded monitoring review is necessary, staff will conduct an on-site review. An on-site monitoring review may include examination of subrecipient programmatic records to validate information reported on performance and financial reports. A review of financial records may include an in-depth examination of invoices, time sheets and other documentation to support expenses charged to the contractual budget. Documentation for program activities is reviewed to corroborate performance reports and to verify that program activity costs allocated to the contractual budget are eligible.

After completing the on-site monitoring review, results are provided in writing to the subrecipient within 30 days. If concerns and/or findings were identified during the review the monitoring letter will outline identified issues and include recommendations and/or corrective actions for resolution. If there were no findings or concerns identified during the monitoring visit, the subrecipient is provided with a letter stating such.

If concerns and/or findings are identified, the subrecipient is instructed to submit a written response within 30 days of the date of the City's monitoring letter. The response is reviewed by staff to determine if information submitted and/or actions taken are adequate to clear monitoring concerns and/or findings. Staff continues to work with the subrecipient until all issues are resolved. At such time, the subrecipient receives written notification that concerns or findings identified during the monitoring visit have been satisfied and the case is closed.

Appendices

Appendix A - Agencies Consulted

Agency / Group / Organization	Agency / Group / Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
Urban League of West Michigan	Services - Housing Regional Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Equity and Inclusion Focus Group
Urban Core Collective	Services - Housing	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Equity and Inclusion Focus Group
Grand Rapids Chamber	Services - Economic Development	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Equity and Inclusion Focus Group
Bethany Christian Services	Services - Housing	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Equity and Inclusion Focus Group
Grand Rapids Public Schools	Services - Education	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Equity and Inclusion Focus Group
Kent ISD	Services - Education	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Equity and Inclusion Focus Group
West Michigan Hispanic Chamber of Commerce	Services - Economic Development Regional Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Equity and Inclusion Focus Group

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Agency / Group / Organization	Agency / Group / Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
Hispanic Center of West Michigan	Services - Economic Development Regional Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Equity and Inclusion Focus Group
Latina Network of West Michigan	Services - Economic Development Regional Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Equity and Inclusion Focus Group
Mercantile Bank	Other - Bank	Housing Needs Assessment Market Analysis	Affordable and Fair Housing Focus Group
Genesis Non-Profit Housing Corporation (CDHO)	Housing Services - Housing	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group
Rural Development (U.S. Dept of Agriculture), Grand Rapids Service Center	Other Government - Federal	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group
Dwelling Place of Grand Rapids NHC (CHDO)	Housing Services - Housing	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group
5th/3rd Bank	Other - Bank	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group
Huntington Bank	Other - Bank	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group

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Agency / Group / Organization	Agency / Group / Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
Hope Network	Services - Housing Services	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group
New Development Corporation (CHDO)	Services - Housing Services	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group
LINC Up Nonprofit Housing Corporation (CHDO)	Services - Housing Services	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing & Equity and Inclusion Focus Groups
ICCF Nonprofit Housing Corporation (CHDO)	Services - Housing Services	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group
Commonwealth	Services - Housing Services	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group
Woda Cooper	Services - Housing Services	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group
Disability Advocates of Kent County, Inc.	Services - Disability	Non-Homeless Special Needs	Affordable and Fair Housing Focus Group
Home Repair Services of Kent County, Inc.	Services - Housing	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Affordable and Fair Housing Focus Group

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Agency / Group / Organization	Agency / Group / Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
North Kent Connect	Regional Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy Homeless Needs	Affordable and Fair Housing Focus Group
Wyoming Housing Commission	РНА	Housing Needs Assessment Market Analysis	Affordable and Fair Housing Focus Group
Property Management Assn of West MI	Regional Organization	Housing Needs Assessment Market Analysis	Affordable and Fair Housing Focus Group
Rental Property Owners Assn of Kent Co.	Regional Organization	Housing Needs Assessment Market Analysis	Affordable and Fair Housing Focus Group
Fair Housing Center of West Michigan	Services - Housing	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy Homeless Needs	Affordable and Fair Housing Focus Group Homeless and Special Needs Focus Group
Grand Rapids Association of Realtors	Regional Organization	Housing Needs Assessment Market Analysis	Affordable and Fair Housing Focus Group
Grand Rapids Opportunities for Women (GROW)	Services - Economic Development	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
West Michigan Works	Services - Economic Development	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
Grand Rapids Community College	Services - Education	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
Literacy Center	Services - Education	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group

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Agency / Group / Organization	Agency / Group / Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
Essential Needs Task Force, Economic and Workforce Development Subcommittee	Regional Organization	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
City of Grand Rapids - Economic Development	Other Government - Local	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
Spring GR	Services - Economic Development	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
West Michigan Center for Arts + Technology	Services - Economic Development	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
Our Community's Children	Services - Economic Development	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
Michigan Department of Health and Human Services	Other Government - State	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group
Michigan Department of Corrections	Other Government - State	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group

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Agency / Group / Organization	Agency / Group / Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
Grand Rapids Pride Center	Services - Education	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group
3-11 Youth Housing	Housing Services - Housing Services - Youth	Homeless Needs – Chronically Homeless Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group
Pine Rest Christian Mental Health Services	Services - Health	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group
Legal Aid of West Michigan	Services - Housing	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group

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Agency / Group / Organization	Agency / Group / Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
Network180	Services - Mental Health	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group
Mel Trotter Ministries	Housing Services Homeless	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group
YWCA West Central Michigan	Housing Services - Homeless	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group
Family Promise of Grand Rapids	Services - Homeless	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group

Agency / Group /	Agency / Group /	What section of the plan was	Page 208 How was Agency/Group/
Organization	Organization Type	addressed by consultation?	Organization consulted?
Grand Rapids Area Coalition to End Homelessness	Services - Homeless	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group
The Salvation Army	Housing Services - Homeless	Non-Homeless Special Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless and Special Needs Focus Group
Eastown Community Association	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group
Baxter Neighborhood Association	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group
Roosevelt Park Neighborhood Association	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group
Neighbors of Belknap Lookout	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group
Heritage Hill Association	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group

			Page 209
Agency / Group / Organization	Agency / Group / Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
Seeds of Promise	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group
West Grand Neighborhood Organization	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group
Garfield Park Neighborhoods Association	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group
Downtown Neighbor Network	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group
Eastgate Neighborhood Association	Other: Neighborhood Organization	Housing Needs Assessment Market Analysis Non-Housing Community Development	Grand Rapids Neighborhood Leadership Focus Group
Cascade Township	Other Government - Local	All Sections	Kent County City, Village, Township Focus Group
City of Kentwood	Other Government - Local	All Sections	Kent County City, Village, Township Focus Group
Grattan Township	Other Government - Local	All Sections	Kent County City, Village, Township Focus Group
City of Grandville	Other Government - Local	All Sections	Kent County City, Village, Township Focus Group
Sparta Township	Other Government - Local	All Sections	Kent County City, Village, Township Focus Group
Byron Township	Other Government - Local	All Sections	Kent County City, Village, Township Focus Group
Gaines Charter Township	Other Government - Local	All Sections	Kent County City, Village, Township Focus Group
City of Wyoming	Other Government - Local	All Sections	Kent County City, Village, Township Focus Group

Appendix B – Focus Group, Public Forum, and Survey Results

The thoughts and comments expressed by the focus group attendees are summarized below.

Housing Need and Priorities Focus Groups

Housing needs and priorities:

- Attendees relayed there are too few housing units on the market and the increasing housing costs are causing those on the economic margins to suffer.
- Attendees felt a key community priority is to increase the number of homeowners and create intentional pathways for renters to reach their homeownership goals.
- Attendees felt increasing minority homeownership rates is important if the community aspires to be an inclusive and equitable community.
- Attendees felt there is a high need for affordable rental housing.
- Attendees reported rapidly increasing housing costs in Grand Rapids. Significant rent increases, as well as property value increases in minority neighborhoods are displacing some low-income Grand Rapids residents, and residents of color, to areas outside the city.
- Attendees felt housing stability is a major issue, not just at the individual household level but at a community level (pressures of gentrification and price escalation).
- Attendees feel there is an opportunity to build additional supportive housing units outside of Grand Rapids due to lower land costs, and favorable Low-Income Housing Tax Credit application criteria.
- Attendees felt there should be a focus on equity in rental housing and ensure application requirements don't unduly burden minority renters (credit, eviction history, lack of rental history).

Housing constraints:

- Attendees felt lead-based paint and asbestos are significant redevelopment and rehabilitation expenses and additional financial resources are needed to address these issues.
- Attendees felt new local capital funding models are needed to address the affordable housing shortage. The community cannot be reliant on federal or state programs to solve these community needs.
- Attendees felt that jurisdictions should be more open to property tax exemptions or payment in lieu of taxes (PILOTs) to spur affordable housing development. Attendees felt this incentive would allow more affordable housing projects to compete for state funding and would lower operating costs.
- Attendees indicated many potential homebuyers in rural Kent County have credit issues that preclude them from qualifying for homebuyer assistance programs or loans.
- Attendees felt additional financial support is necessary to cover the widening gap between the cost of development and the sales price necessary for the unit to remain affordable.
- Attendees indicated that a recent Grand Rapids housing study identified a need for 9,000 new housing units over the next five years, which will cost approximately \$1.8 billion.

Other concerns or recommendations:

- Attendees felt the down payment or first-time homebuyer program assistance amounts are too low to be effective.
- Attendees felt the realtor community has a bias against down payment assistance programs and additional education is needed, or the down payment programs need to be streamlined.
- Attendees expressed concerns that redevelopment efforts may be harming certain communities by increasing housing prices and pushing long-term residents out of neighborhoods.
- Attendees felt there is need to for accessibility audits for seniors throughout the community, to identify home modifications or improvements which would allow them age in place longer in their existing home.
- Attendees indicated transportation access is a barrier for individuals and families, especially rural areas of Kent County.
- Attendees felt there should be additional focus on housing assistance or support for recently released individuals and refugee families.

Equity and Inclusion Focus Groups

Equitable and inclusive housing needs and priorities:

- Attendees indicated a need to address and reverse the effects of historic and systemic exclusion of minorities in housing, which has led to high concentrations of poverty and racial and ethnic segregation.
- Attendees felt historic redlining and discrimination of minorities prevented generations of minorities from generating wealth because most households gain wealth through homeownership and many communities of color were intentionally left out of that system.
- Attendees felt intentional efforts are required to ensure neighborhood development is equitable and mindful of community needs, and the projects serve current residents. (It's not just about pouring money into our community, especially our Black and brown communities.)
- Attendees expressed a need for deliberate thoughtfulness during the planning and policy making process to evaluate how the policies may affect residents in the community.
- Attendees indicated there is a need to change community attitudes towards homelessness and the people affected by housing crisis. Additional education on why homelessness happens and being more empathetic to those individuals and families.
- Attendees felt significant barriers toward obtaining quality rental housing exist:
 - Barriers are erected and landlords still discriminate or refuse to lease to all people based on rental history or credit, even when they have a good source of income.
 - Since the housing market is so tight, landlords get to pick the "right" type of tenant.

Other concerns or recommendations:

- Attendees felt there is need to define equity and inclusion success, and how it is measured.
- Attendees felt the vocabulary of success should be person-centric and focus on individuals and families rather than neighborhoods or blocks.
- Attendees expressed concerns that redevelopment activities in Grand Rapids are exacerbating displacement pressures.

- Attendees felt better efforts are required to guarantee everyone has an opportunity to live in a manner suitable for their current household situation.
- There was a general agreement that information access and communication need to improve:
 - o Intentional outreach to minority- and immigrant-owned businesses.
 - Language and trust are a barrier for many residents.
- Attendees indicated a need for continued advocacy on behalf of low-income residents.
- Attendees indicated several "good" investors are working in minority communities and those investors should be embraced and supported.
- Attendees felt improving economic opportunities for communities of color is a priority need.
- Attendees indicated focusing on reducing barriers to employment, such as access to affordable childcare and transportation, is a priority need.

Economic Development Focus Group

Priority Needs:

- Attendees felt additional training opportunities or career coaching for clients is needed, and agency staff are culturally competent and understand the various cultural needs and experiences of the clients.
- Attendees felt client data sharing among agencies needs improvement so client performance and needs are better tracked and supported. Attendees felt improved data sharing would enhance client outreach and agency efforts would be more coordinated and efficient.
- Attendees felt childcare assistance for people in workforce development training programs is a critical need.
- Attendees expressed the need for a funding bridge to solve the "benefits cliff". The benefits cliff is where people lose benefits, such as rent or childcare assistance, because they are making more money, but the increased wages are not enough to pay for the lost benefits. The benefits cliff is an institutional barrier that can impair individuals seeking employment.
- Many attendees noted the lack of Section 8 housing and vouchers is a challenge for many Grand Rapids workforce development participants resulting in many participants relocating to areas outside of the city for less expensive housing, which results in less access to resources.
- Attendees felt soft skills and workforce development programs should be better tailored to the individual's needs, and programs should allow more time with clients, rather than moving them from class to class over a 90-day period.
- Attendees indicated there are more financially challenged clients experiencing trauma, which is impacting their ability to successfully gain employment.
- Attendees indicated the workforce development space is very crowded with programs and agencies, which makes it is difficult to ensure clients are connected to the appropriate agency or program.
- Attendees felt criminal conviction expungement is a high need because it is a barrier to many jobs. For example, many healthcare jobs and training opportunities exist, but a felony conviction precludes employment in the healthcare system.

Small Business Development Needs:

• Attendees indicated many gaps exist to support and develop small businesses and entrepreneurs.

- Attendees indicated support and incentive program guidelines need to be evaluated because the funding restrictions or reporting requirements are onerous, and many small businesses do not have the necessary accounting or reporting infrastructure.
- Attendees felt it is necessary to "be smart" about how small business assistance is structured. Different businesses have different needs and programs should respond to those needs and not be too rigid.
- Attendees felt that wealth creation measurements should be emphasized. Instead of simply measuring jobs created or retained, wealth-oriented metrics like attaining building or company ownership should be incorporated.
- Attendees felt it would be extremely helpful to have a list of trusted and culturally competent specialty vendors identified to help small businesses and entrepreneurs, such as accountants, computer specialists, etc. COVID-19 has highlighted this resource need as traditionally non-tech businesses were required to incorporate a technology layer not previously required. For example, restaurants now need a robust online way to order and deliver food, but the restaurant owner does not have the time or ability to undertake those changes.
- Attendees indicated greater supportive capacity is needed to assist entrepreneurs and small businesses with technical assistance, especially minority and immigrant businesses owners.
- Attendees felt better outreach and advertisement of financial assistance programs is needed because many businesses are unaware of the available programs.

Homelessness and Special Needs Focus Group

Needs and priorities:

- Attendees felt the rise in homelessness is due to a lack of available, affordable rental housing.
- Attendees felt the homeless prevention system has improved over the years, including better coordination among housing providers and a better coordinated entry system.
- Attendees felt that opportunities for individuals exiting to permanent housing have worsened due to a lack of affordable permanent housing and rental support.
- Attendees indicated additional rapid rehousing opportunities for families should be prioritized.
- Attendees felt Grand Rapids source of income protections is ineffective. Attendees felt enforcement is lax and large apartment companies continue to refuse to accept vouchers.
- Attendees expressed concern that the Housing Choice Voucher utilization rate, which dropped from 96% to 91%, could increase the number of homeless individuals and families.
- Attendees felt additional eviction resources are needed to prevent homelessness.
- Attendees indicated emergency shelters still serve a need, even with a "housing first" policy.
- Attendees felt non-homeless special needs (elderly, people with HIV/AIDS) are fairly well accommodated in Kent County and Grand Rapids.

Kent County Leadership Focus Group

Needs and priorities:

- Attendees felt housing affordability and availability are significant needs, as is economic development and job creation.
- Attendees felt the CDBG program has been valuable in developing parks and recreation amenities such as bike trails and similar infrastructure.

- Attendees felt the sidewalk improvement projects have been successful and welcomed in the various communities.
- Attendees felt workforce development needs are well addressed through the MichiganWorks! programs.
- Attendees indicated a need for additional workforce housing in the County.
- Attendees felt communication and advertising improvements are needed to increase program visibility and participation.
- Attendees felt the homeowner rehabilitation and accessibility programs are successful.
- Attendees expressed a need for rental housing rehabilitation.
- Attendees felt transportation services are a high priority and should be expanded.
- Attendees felt streetscape and other public infrastructure improvements are needed.

Neighborhood Association and Leadership Focus Group

Needs and Priorities:

- Attendees felt certain landlords are problematic to neighborhoods because of property conditions and inaction with problem tenants, even when notified or reported.
- Attendees felt increased housing code or fair housing enforcement is needed to protect tenants from unscrupulous landlords.
- Attendees indicated many undocumented or under-documented households are being exploited in the rental market. They felt little enforcement happens or residents don't know their rights under the law.
- Attendees felt there needs to be better tenant advocacy and outreach efforts in Grand Rapids. Few protections for renters in Michigan.
- Attendees indicated the City of Grand Rapids is a good partner to support neighborhood leadership and development.
- Attendees felt communication about programs and opportunities for residents needs improvement and information sharing is challenging, especially with COVID restrictions.
- Attendees felt that language is a barrier to getting out information regarding various city programs, or other neighborhood events.
- Attendees felt home repair programs should reduce eligibility requirements because many overincome homeowners cannot afford repairs or upgrades.
- Attendees expressed concern about support new residents receive from refugee resettlement programs. They felt the three months financial support new residents receive is not enough, and they are not getting adequate health information.
- Attendees indicated residents are concerned about crime and traffic (truck traffic on residential streets and speed).
- Attendees felt housing assistance for undocumented or under-documented residents is needed because they cannot qualify for many existing programs.
- Attendees expressed concern about Section 8 availability and increasing rent costs, and indicated many renters are seeking less expensive housing outside of Grand Rapids.
- Attendees felt better promotion of first-time homebuyer programs to renters is needed so they can build wealth and possibly stay in Grand Rapids neighborhoods.
- Attendees felt the HUD programs should be targeted to very low- and low-income households, and programs need to be better tailored to individual needs.

- Attendees felt poverty reduction activities should be a priority.
- Attendees indicated Grand Rapids zoning regulations are an impediment to developing smaller lot homes. Attendees felt residents support constructing smaller homes on vacant lots and it would provide great starter home opportunities.
- Attendees felt Grand Rapids staff should more actively direct housing developers to areas where development is most needed.
- Attendees mentioned that there is a distrust of developers by some residents based on past experiences such as lack of follow through.
- Attendees felt better access to fresh food and groceries in many low-income neighborhoods is needed.
- Attendees felt public transportation systems need to improve access between neighborhoods and employment clusters.
- Attendees felt program evaluation frameworks (outcomes) should be updated and capture important activities, beyond just crime prevention activities.
 - Does not capture all relevant community-building efforts undertaken by neighborhoods.
 - Goals and outcomes should focus on neighborhood needs.
- Attendees felt progress toward addressing quality of life issues should be measured such as traffic, environmental concerns, etc.
- Attendees indicated they would like detailed conversations about neighborhood funding plans and outcomes.
- Attendees indicated they would like additional flexibility to fundraise non-federal dollars to support neighborhood organizations.

Kent County and Grand Rapids Public Forums

The public was invited to attend a series of online public forums from October 7, 2020 through October 15, 2020. The forums were advertised through press releases, Grand Rapids and Kent County social media posts, and direct email invitations to over 930 community stakeholders, neighborhood associations and residents. The online forums were held in the evening to accommodate as many working residents as possible. Four forums targeted Kent County Residents (two in English and two in Spanish), and six forums targeted Grand Rapids Residents (three in English and three in Spanish).

Kent County Public Forums

No comments received from the Kent County forums.

Grand Rapids Public Forums

1st Ward

- Attendees felt housing for larger families, especially multi-generational families is needed.
- Attendees indicated funding for small home repairs and to address code compliance items are needed in the 1st Ward.
- Attendees expressed concerns about residents' ability to stay in the neighborhood due to escalating prices, especially undocumented or under documented residents.
- Attendees felt traffic safety was a significant neighborhood issues (speed, noise, ability of children to safely cross the street)

- Attendees felt there is good communication and cooperation with the police department and community officers.
- Attendees expressed concern about property tax increases and long-term affordability for residents, particularly those on fixed incomes.
- Attendees felt there are opportunities for better community engagement in the neighborhoods, post COVID.
 - Attendees felt the priorities for HUD funds should be:
 - Affordable housing
 - o Investments focused to directly help current residents.
 - Community amenities and services
 - Employment opportunities
 - Youth engagement and employment opportunities
- Attendees indicated environmental justice issues exist in certain neighborhoods: air quality, water pollution (creeks) and lack of trees.

2nd Ward – No Comments

3rd Ward

- Attendees felt Grand Rapids (city organization) is doing well with street tree plantings and replacements, infrastructure maintenance, and park improvements.
- Attendees felt the following should be prioritized:
 - Rental housing for households below 60% Area Median Income
 - Increased down payment / homebuyer assistance to make homeownership more accessible.
 - Rehabilitation and resale of existing housing structures in the neighborhoods.
- Attendees expressed concerns about ongoing rental housing discrimination particularly against minorities and families with children.
- Attendees felt zoning regulations should be loosened to allow construction of homes on smaller lots and smaller building sizes.
- Attendees felt the public transportation system needs covered bus stops and more frequent routes.

Community Needs and Priorities Survey

A community needs and priorities survey was undertaken as part of the community planning outreach efforts. The survey was available in English and Spanish, and distributed through various means including direct email, posting on agency social media accounts and paid advertising through Facebook. The online survey was available from September 30, 2020 through November 13, 2020 and resulted in 390 responses which are summarized below. The results are based on the weighted averages of the responses. The full results of the survey are attached.

Housing types most needed in Grand Rapids and Kent County:

- 1) Affordable for-sale housing
- 2) Affordable rental housing
- 3) Housing for disabled residents
- 4) Senior housing
- 5) Housing for homeless

6) Housing for large households.

Housing services most needed in Grand Rapids and Kent County:

- 1) Homebuyer assistance
- 2) Weatherization
- 3) Homeowner education
- 4) Homebuyer education
- 5) Rent assistance
- 6) Fair housing efforts
- 7) Lead-based paint remediation
- 8) Utility assistance
- 9) Mortgage payment assistance
- 10) Disability accessibility improvements.

Economic development needs in Grand Rapids and Kent County:

- 1) Job opportunities
- 2) Small businesses loans or grants
- 3) Assistance for minority or women-owned businesses
- 4) Job training or counseling programs
- 5) Small businesses technical assistance
- 6) Ex-offender re-entry assistance
- 7) Façade improvements
- 8) Commercial rehabilitation.

Public infrastructure needs in Grand Rapids and Kent County:

- 1) Improved internet access
- 2) Street improvements
- 3) Improvements to existing parks / open space
- 4) Sidewalk improvements
- 5) Additional recreation trails
- 6) Public facility improvements
- 7) Tree planting
- 8) Accessibility improvements in public facilities
- 9) Additional parks and open space
- 10) Accessibility improvements to curb cuts and sidewalks.

Public service needs in Grand Rapids and Kent County:

- 1) Childcare
- 2) Medical / mental health services
- 3) Emergency payment assistance
- 4) Crime prevention education
- 5) Transportation
- 6) Activities for seniors
- 7) Homeless / housing crisis services
- 8) Services for persons with disabilities
- 9) Housing counseling

10) Legal services.

Housing <u>development</u> priorities:

- 1) Affordable rental housing
- 2) Affordable for sale housing
- 3) Housing for people who are homeless
- 4) Housing for disabled residents
- 5) Senior housing
- 6) Housing for large households.

Housing services priorities:

- 1) Owner-occupied repair
- 2) Rent payment assistance
- 3) Homebuyer assistance
- 4) Weatherization / energy-efficiency improvements
- 5) Fair housing education / enforcement
- 6) Foreclosure prevention counseling
- 7) Homebuyer education / financial literacy
- 8) Disability accessibility improvements
- 9) Lead-based paint remediation
- 10) Housing or building code enforcement.

Economic development priorities:

- 1) Assistance specifically for minority or women owned businesses
- 2) Job opportunities
- 3) Small businesses loans or grants
- 4) Job training or counseling programs
- 5) Ex-offender re-entry assistance or training
- 6) Small business technical assistance
- 7) Commercial rehabilitation
- 8) Façade improvements.

Public infrastructure priorities:

- 1) Improved internet access
- 2) Street improvements
- 3) Improvements to existing parks and open space
- 4) Accessibility improvements to curb cuts and sidewalks
- 5) Sidewalk improvements
- 6) Additional parks and open space
- 7) Additional recreation trails
- 8) Street lighting improvements
- 9) Accessibility improvements in public facilities
- 10) Tree planting.

Public services priorities:

- 1) Childcare
- 2) Medical / mental health services
- 3) Homeless / housing crisis services
- 4) Emergency payment assistance,
- 5) Activities for youth
- 6) Crime prevention education
- 7) Services for persons with disabilities
- 8) Activities for seniors
- 9) Transportation services
- 10) Legal services

Lastly, respondents were asked to broadly think how community development investments should be prioritized. Respondents indicated that broadly, community investment priorities are:

- 1) Housing services
- 2) Economic development services
- 3) Public services
- 4) Housing construction or renovations
- 5) Public infrastructure improvements.

Fair Housing Public Comments and Survey Results

During the public engagement process, efforts were made to consult with fair housing advocates, housing developers and landlord associations through a series of focus groups. Additionally, a survey (in English and Spanish) was conducted to gain insight into respondent's experiences with housing discrimination.

The top issue identified by all focus groups is the need for additional housing. The Grand Rapids area is seeing tremendous price and rent escalation and housing costs are outpacing wage growth.

Within the general housing category, the top three needs are:

- 1) Encouraging minority homeownership. This is seen as a priority toward equitable development.
- 2) Developing additional affordable rental housing.
- 3) Developing additional affordable for-sale housing.

Specifically related to fair housing education and enforcement, the following concerns and suggestions were raised:

- 1) Source of income ordinance frustrates all parties (fair housing advocates and landlords)
 - There are questions about enforceability and consistency that frustrate housing advocates.
 - Requiring landlords to take Section 8 frustrates landlords because it requires them to enter a contract with the local housing authority.
- 2) There are three different housing ordinances in Grand Rapids rather than one unified ordinance which makes enforcement challenging.
 - Chapter 160 Discrimination in Real Property Transactions.

- Chapter 174 Residential Rental Application Fees.
- Chapter 176 Human Rights Ordinance.
- 3) Third-party groups cannot bring a private cause of action, and penalties are low (a civil ticket no criminal liability). Violation fines:
 - Chapter 160: \$1,000 first offense, \$1,500 first repeat offense, \$2,000 subsequent offenses.
 - Chapter 174: \$100 first offense, \$200 first repeat offense, \$1,000 subsequent offenses.
 - Chapter 176: Civil infraction up to \$500.
- 4) Additional fair housing education is necessary to:
 - Ensure residents know where and how to file complaints if they feel they are a victim of housing discrimination.
 - Continue to educate property owners on their fair housing obligations and current laws.
- 5) Additional outreach and training for landlords on the Housing Choice Voucher (HCV) Program. It was widely discussed in focus groups that not enough landlords participate in the HCV program. Focus group members thought additional education about the program would be beneficial. Rental association advocates felt there is hesitation among property owners to participate in the program because of tenant-caused property damage concerns. They suggested creating a damage-loss risk pool might attract additional HCV participation. Property owners would only utilize the risk-pool if tenant-caused damages are greater than the security deposits.

Fair Housing Survey Results Summary

The Fair Housing Survey was primarily designed to understand respondent's history and experience with housing discrimination, predatory lending, steering, and familiarity with fair housing laws and local fair housing agencies. The number of respondents vary widely based on answers to previous questions. For example, only 42 of 160 responded they had experienced housing discrimination. Subsequently, only those 42 persons were asked additional questions about the nature of the discrimination.

Slightly more than 16% indicated they experienced some type of housing discrimination. Ten percent (10%) did not know and almost 74% reported they have not experienced housing discrimination. When factored for race, nearly 49% of the non-White respondents had experienced housing discrimination or were unsure.

The split between rental and for-sale discrimination was nearly identical. The most common forms of discrimination were race, followed by familial status, and source of income. Race accounted for nearly 60% of home-purchase discrimination responses. Respondents did indicate instances of "steering" while looking for a home.

Nearly 40% of respondents felt there is adequate housing in their community that meets their needs, however the same percentage disagreed. When asked about their current housing or neighborhood satisfaction, almost 75% were very satisfied or satisfied. Of the 13% that were dissatisfied or very dissatisfied, the leading reasons were: crime (67%), issues with neighbors (48%), quality of the housing (33%), cost of housing (33%), and other (33%).

When discussing predatory lending, 13% responded they have been a victim or were unsure if they were a victim of predatory lending. Those who felt they had been a victim indicated they were targeted based on race, source of income or sex. Only one-third sought assistance with their loans, and of those 42% were satisfied with the outcome.

When asked about their awareness or knowledge of fair housing laws or their rights under the Fair Housing Act, 71.5% indicated they were aware and 28.5% indicated they were not. 44% indicated they know where to report issues of housing discrimination and 56% indicated they did not.

When asked about their exposure to fair housing outreach activities, only 23% responded that they had seen advertising or flyers related to fair housing enforcement or housing counseling in the Grand Rapids or Kent County.

Appendix C - Assisted Housing Inventory

Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
101 South Division Lofts	101 S. Division Ave	Grand Rapids	20	20		2053		LIHTC
1330 Prospect SE	1330 Prospect Ave SE	Grand Rapids	1	1				HOME
20 Fulton Street East Apartments	20 E. Fulton Street	Grand Rapids	23	23		2061		LIHTC/HOME
20 Fulton Street East II Apartments	20 E. Fulton Street	Grand Rapids	22	22		2061		LIHTC
205 South Division Avenue Apartments	205 S. Division Ave	Grand Rapids	38	30		2058		LIHTC
240 Ionia Avenue Apartments	240 Ionia Ave SW	Grand Rapids	48	40		2058		LIHTC
26 Cherry Street Apartments	26 Cherry St SE	Grand Rapids	45	36		2058		LIHTC
345 State Street Apartments	345 State St SE	Grand Rapids	34	28		2059		LIHTC
435 LaGrave at Tapestry Square	435 LaGrave Ave SE	Grand Rapids	20	16	PSH	2061		LIHTC / Bond / HOME
54th Street Apartments	178 54th St	Wyoming	4	4	Special Needs	2024		LIHTC
54th Street Apartments II	180 54th St	Wyoming	4	4	Family	2036		Mi-Home / LIHTC
834 Lake Drive Apartments	834 Lake Dr SE	Grand Rapids	37	37		2058		LIHTC
Allen Manor	532 James St SE	Grand Rapids	24	24			2035	Insured- Subsidized
Ambrose Ridge	1501 Woodworth St NE	Grand Rapids	84	84	Elderly	2110		LIHTC / TE Bonds

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
American House - Grand Rapids	2771 Kalamazoo Ave SE	Grand Rapids	133	41	Elderly	2025		LIHTC
Avenue Apartments, The	1300 Madison Ave SE	Grand Rapids	10	10	Elderly	2035		HOME / LIHTC
Baileys Grove	5252 Bailey Ctr Dr SE	Grand Rapids	43	43			2021	202/811
Bayberry Farms Village	2520 56th SW	Wyoming	64	26	Elderly			TEAM - TAX Exempt
BCS Apartments	1168 Madison Ave SE	Grand Rapids	2	2	Family	2035		LIHTC
Birchgrove Apartments	4022 Kalamazoo Ave SE	Grand Rapids	19	19			2036	Insured- Subsidized
Breton Village Green	2305 Burton St SE	Grand Rapids	162	162	Elderly	2045	2035	Section 8 / LIHTC / Bonds
Bridge Street Place	761 Bridge Ave NW	Grand Rapids	16	16		2039		LIHTC
Cambridge Square I	1836 Mason St NE	Grand Rapids	124	57			2021	Subsidized - Previously Insured
Cambridge Square II	1836 Mason St NE	Grand Rapids	124	62			2021	Subsidized - Previously Insured
Camelot Woods I	2399 Charring Cross Dr SE	Grand Rapids	200	200			2024	Subsidized, No HUD Financing
Camelot Woods II	2399 Charring Cross Dr SE	Grand Rapids	100	100	Family		2021	Section 8
Campau Commons	835 Commons St SW	Grand Rapids	92	92		2051		LIHTC

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
Carlton Homes	34, 38, & 42 Carlton Ave SE	Grand Rapids	3	3	Special Needs			Mi-HOME
Carmody Apartments	730 and 736 Madison Ave SE	Grand Rapids	19	19				HOME
Carrier Crest Apartments	205 Carrier St NE	Grand Rapids	12	12	Elderly	2022		LIHTC
Century Lofts - Phase One	40 Logan S SW	Grand Rapids	43	43		2057		LIHTC
Century Lofts - Phase Two	40 Logan St SW	Grand Rapids	44	44		2057		LIHTC
Coventry Woods	3550 Remembrance Rd NW	Walker	101	101	Elderly	2040	2033	Section 8 / LIHTC
Crestmoor Ridgebrook	Various (3 Duplexes At 5974-76 Crestmoor SE, 5890-92 Ridgebrook SE, And 5841-43 Ridgebrook SE)	Kentwood	6	6				Supportive Housing
Creston Plaza - Phase I	1014 Clancy Ave NE	Grand Rapids	50	50		2059		LIHTC
Creston Plaza - Phase II	1014 Clancy Ave NE	Grand Rapids	50	50		2059		LIHTC
David's House	2390 Banner St SW	Wyoming	10	10			2027	202/811
Delaware Heights	10 Delaware St SW	Grand Rapids	36	36			2021	202/811
Delaware Manor	10 Delaware St SW	Grand Rapids	47	46			2031	Insured- Subsidized
Diamond Place	1003 Michigan St NE	Grand Rapids	123	98				LIHTC
Division Park Avenue Apartments	209 and 217 S Division Ave	Grand Rapids	30	30		2056		LIHTC

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
Eastbrook Apartments	2329 Timberbrook Dr SE	Grand Rapids	54	54	Family	2031		LIHTC
Elmdale Apartments	1361 Elmdale St NE	Grand Rapids	19	18			2032	Insured- Subsidized
Emerald Creek	3416 Haleh Circle SE	Grand Rapids	64	29	Family	2032		TEAM / LIHTC
Emerald Creek Phase II	3416 Haleh Circle SE	Grand Rapids	30	15	Family	2034		TEAM / LIHTC
Fairlane Meadows Cooperative	3471 Fairmeadow Dr SW	Grandville	48	19			2032	Subsidized - Previously Insured
Ferguson Apartments	72 Sheldon Ave SE	Grand Rapids	119	119	PSH (67)	2031	2040	LIHTC / Bonds / HTF / RAD / MHCDF
Fountains, The	3971 Whispering Way Dr SE	Grand Rapids	168	53			2039	Subsidized - Previously Insured
Gaines Street	123 Gaines St SE	Cutlerville	4	4	Special Needs			Mi-HOME
Garfield Park Lofts	100 Burton St SE	Grand Rapids	36	36				LIHTC
Gaylord House	2765 Orange Ave SE	Grand Rapids	28	28			2038	Insured- Subsidized
Genesis East	2745 44Th St SE	Kentwood	23	23	Family/PSH (2)	2045		CSH / HOME / LIHTC
Genesis West	4041 44Th St SW	Grandville	33	33	PSH	2058		HOME / LIHTC / Bonds
Globe, The	315 Commerce St SW	Grand Rapids	110	88	Family	2116		Modified Passthrough / LIHTC

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
Goodrich Apartments	333-339 S. Division Ave	Grand Rapids	14	14	Family	2039		LIHTC/ TCAP
Grand Heritage Manor	4300 Parkview Dr SW	Grandville	41	41			2038	Insured- Subsidized
Grand View Place	936 Front Ave NW	Grand Rapids	68	68		2062		LIHTC
Grandview Apartments	1925 Bridge St NW	Grand Rapids	193	193			2037	Insured- Subsidized
Grandville Homes	Scattered Sites	Grand Rapids	10	10		2027		LIHTC
Greentree	4320 Kalamazoo St SE	Kentwood	152	152	Elderly	2039	2031	Section 8 / LIHTC / 1602 / TCAP
Harrison Park Apartments	1400 Alpine Ave NW	Grand Rapids	45	45				LIHTC
Harvest Hill Apartments	100 Childsdale Ave NE	Rockford	46	46	Family	2115		LIHTC (Ruralhousserv)
Harvest Way Retirement Community	100 Ida Red Ave	Sparta	45	45			2021	202/811
Herkimer Apartments - Division Avenue	309 S. Division Ave	Grand Rapids	55	55	PSH	2057		HOME / LIHTC / Tax-Exempt
Herkimer Commerce - Commerce Avenue	310 Commerce Ave SW	Grand Rapids	67	67	PSH	2057		LIHTC
Heron Courtyard	2100 Leonard St NE	Grand Rapids	33	33	PSH	2117		HOME / LIHTC
Heron Manor Enhanced Supportive Housing for Seniors	2106 Leonard St NE	Grand Rapids	55	25	Elderly	2038		HOME / TAXEX / LIHTC

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
Hillview Townhouses	602 Hillview Place	Rockford	136	130			2030	Insured- Subsidized
Hope Community	1024 Ionia Ave SW	Grand Rapids	12	12		2021		LIHTC
Hope Community Phase II	1024 Ionia Ave SW	Grand Rapids	12	12		2023		LIHTC
ICCF - 501 Eastern Apartments	501 Eastern Ave SE	Grand Rapids	65	65	PSH (32)	2049		LIHTC
Kelsey Apartments	235 S. Division Ave	Grand Rapids	12	12	Family	2119		HOME / LIHTC
Kent Residential Center	3210 Gladiola Ave SW	Wyoming	16	16			2021	Subsidized, No HUD Financing
Kent Ridge Junction	161 Kent Ridge Dr	Kent City	32	32	Family	2022		LIHTC (Ruralhousserv)
Kentwood (Countryside) Apartments	4885 Green Oak Ln	Kentwood	146	141			2029	Insured- Subsidized
Kingsbury Place Apartments	725 North Center Dr	Walker	44	44	PSH	2050		HOME / LIHTC
Klingman Lofts Phase I	400 Ionia Ave SW	Grand Rapids	41	41		2060		LIHTC
Klingman Lofts Phase II	400 Ionia Ave SW	Grand Rapids	42	42		2060		LIHTC
LCH36 Redevelopment Project	138, 303, 343, 349 S. Division Ave	Grand Rapids	49	49		2061		LIHTC
Leo & Alpine	750 Leonard St NW	Grand Rapids	36	28				LIHTC
Leonard Pines Apartments	1319 Leonard St NE	Grand Rapids	24	24			2034	Insured- Subsidized
1321 Ewing SE	1321 Ewing Ave SE	Grand Rapids	2	2				HOME

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
1648 Madison SE	1648 Madison Ave SE	Grand Rapids	2	2				HOME
1654 Madison SE	1654 Madison Ave SE	Grand Rapids	2	2				HOME
Madison Avenue Apartments	1102 Madison Ave SE & 1131 Madison Ave SE	Grand Rapids	6	6				HOME
Madison Hall Townhomes	1221 Madison Ave SE	Grand Rapids	12	12	Family	2034		LIHTC
Marsh Ridge (I & Ii)	470 Marsh Ridge Dr NW	Grand Rapids	150	120	Elderly	2045		LIHTC / TAX Exempt / HOME
Marsh Ridge III	470 Marsh Ridge Dr NW	Grand Rapids	131	131	Elderly	2037		TEAM / LIHTC / HOME
Martineau Project	106 S. Division Ave	Grand Rapids	12	12				HOME
Martineau Project	120 S. Division Ave	Grand Rapids	1	1				HOME
Martineau Project	120 S. Division Ave	Grand Rapids	2	2				HOME
Martineau Project	120 S. Division Ave	Grand Rapids	8	8				HOME
Metropolitan Apartments	4634 N Breton Ct SE	Kentwood	18	18			2034	Insured- Subsidized
Metropolitan Park Apartments	350 Ionia Ave SW	Grand Rapids	24	24		2036		LIHTC
Mildred Housing	35 East Maple St	Sand Lake	32	32	Elderly	2050	2026	LIHTC
Mount Mercy Apartments	1425 Bridge St NW	Grand Rapids	125	125		2022		LIHTC
Mt. Mercy Housing Development li	1511 Bridge St NW	Grand Rapids	55	55	Elderly	2118		LIHTC

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
New Hope Homes	Shelby SW & Putnam SW	Grand Rapids	12	12		2040		LIHTC
Oak Ridge Retirement Community	3781 Giddings Ave SE	Grand Rapids	45	45			2021	202/811
Orchard Place	1300 Knapp St NE	Grand Rapids	138	138		2039		LIHTC
Oroiquis Apartments	400-404 Bridge St NW	Grand Rapids	27	27	PSH	2030		LIHTC
Park Place Apartment Homes	2932 Marshall Ave SE	Grand Rapids	165	165	Family	2037		TEAM / LIHTC / HOME
Pheasant Ridge	3395 Pheasant Ridge SE	Kentwood	166	166	Family	2033		Section 236 / LIHTC
Pine Avenue Apartments	1138 Pine Ave SW	Grand Rapids	23	23				LIHTC
Pine Oak Apartments	850 36th St SW	Wyoming	127	127	Elderly	2039		TAXEX Sect 236 PRESERV / Rent Sup / LIHTC
Pine Ridge Apartments	3376 Tamarack Ct NE	Grand Rapids	125	125			2034	Insured- Subsidized
Pinery Park Apartments	2300 Newstead Ave SW	Wyoming	80	79			2035	Subsidized - Previously Insured
Pleasant Prospect Homes III	Scattered Sites	Grand Rapids	90	90	PSH (77)	2059		LIHTC / HOME
Plymouth Arms Apartments	1836 Mason St NE	Grand Rapids	153	153			2031	Insured- Subsidized
Ransom Towers	50 Ransom Ave NE	Grand Rapids	48	48			2035	Subsidized, No HUD Financing

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
Red Flannel Acres	311 Oak Court	Cedar Springs	48	48		2054	2031	LIHTC (RHS)
Reflections Senior	500 Hall St SE	Grand Rapids	60	60	Elderly	2041	2034	LIHTC / NSP2 / NSP 3
Richter Place	9101 Courtland Dr NE	Rockford	46	46			2021	202/811
Ridgewood Village	2110 Woodwind Dr SE	Grand Rapids	240	192	Family			80/20
River Grove Retirement Community	5761 Jupiter Ave NE	Belmont	44	44			2034	Subsidized, No HUD Financing
Riverwalk Apartments	1501 Deborah Drive	Lowell	48	48		2053		LIHTC (RHS)
Rogers	3210 Gladiola St SW	Wyoming	16	16	Special Needs			MR - Section 8
Roosevelt Park Lofts	1363 Grandville Ave SW	Grand Rapids	21	21		2043		LIHTC
Serrano Lofts	17 Williams St SW	Grand Rapids	15	15		2055		LIHTC
Sheldon Housing Development	1010 Sheldon Ave SE	Grand Rapids	45	45	Elderly	2119		LIHTC
Southtown Square	413 Hall Street SE	Grand Rapids	44	44		2059	2030	LIHTC / NSP
Sparta Townhouses	181 Clark Street	Sparta	49	49			2021	202/811
Station Creek Retirement Community	10010 Crossroad Court	Caledonia	87	86			2033	HUD Held
Stonebrook III	1880 Stonebrook Dr NE	Grand Rapids	64	26	Family	2027		TEAM / LIHTC
Stonebrook Townhomes I & II	1880 Stonebrook Dr NE	Grand Rapids	150	102		2044		LIHTC / HOME / Bond

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
Stuyvesant Apartments	401 Cherry St SE	Grand Rapids	87	87		2058		LIHTC
Stuyvesant Apartments	140 Madison Ave SE	Grand Rapids	100	100			2039	Insured- Subsidized
Summer Haven Senior Community	4740 Breton Rd SE	Kentwood	101	94	Elderly	2042		80/20 / LIHTC / HOME
Tamarisk Apts	4520 Bowen Blvd SE	Kentwood	40	40			2033	Insured- Subsidized
Uptown Village	950 Wealthy St SE	Grand Rapids	24	24		2036		HOME / LIHTC
Verne Barry Place	60 S Division Ave	Grand Rapids	116	116	PSH	2036		HOME / LIHTC
Villa Esperanza	1446 44th St SW	Wyoming	180	54			2032	Insured- Subsidized
Villa Maria Retirement Community	1315 Walker Ave NW	Grand Rapids	24	24			2021	202/811
Village Drive Apartments	2000 Saginaw Dr SE	Grand Rapids	42	42			2020	202/811
Walker Meadow Retirement Community	1101 Wilson Ave NW	Walker	18	18			2034	Insured- Subsidized
Walker Village Apartments	1230 Walker Village Dr NW	Grand Rapids	80	78			2037	Subsidized - Previously Insured
Walnut Grove	875 Sheffield St SW	Grand Rapids	190	190	Family	2116	2025	Section 8 / Bond / HOME / LIHTC
100-150 Wealthy at Tapestry Square	100-150 Wealthy St SE	Grand Rapids	32	32				NSP2

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Name	Address	City	Total Units	Assisted Units	Target Population	LIHTC Extended Use Exp.	Section 8 Expiration	Program
Wellington Woods Senior	4550 N Breton Ct SE	Kentwood	90	81	Elderly	2024		LIHTC
Westminster Meadows	1152 Plymouth St NE	Grand Rapids	64	64	Elderly	2029		LIHTC
Total			8,502	7,606				

Outcome 1: Prevent and	resolve episo	des of homelessness
Activity	HUD Output	Outputs and Indicators
Coordinated Entry	People	Output 1: persons assessed Indicator 1: persons referred to permanent
		housing <u>Output 2</u> : households assessed <u>Indicator 2</u> : households referred to permanent housing
Homelessness Prevention Rapid Rehousing Tenant-Based Rental Assistance Emergency Shelter	Households People	Output 1:
Street Outreach	People	Output: persons contacted through street outreach Indicator 1: persons connected to a housing resource Indicator 2: persons connected to emergency shelter

Appendix D - Grand Rapids Neighborhood Investment Plan Performance Measures

Outcome 2: Improve access to and stability of affordable housing

Activity	HUD Output	Outputs and Indicators		
Fair Housing Services	People	Output: people received fair housing		
		education and outreach		
		Indicator 1: housing industry professionals		
		indicating they will modify business practices		
		following the training		
		Indicator 2: housing tests conducted to		
		determine compliance with fair housing laws		
Homebuyer Downpayment	Households	Output: households received downpayment		
Assistance		assistance to purchase their first home		
		Indicator 1: housing units remain affordable		
		for five years		
		Indicator 2: households whose housing costs		
		do not exceed 40% of their income		
Housing Legal Services	People	Output: people received legal counseling or		
		representation on a housing-related legal matter		
		Indicator: people whose housing-related legal		
		matter is resolved		

Outcome 3: Increase th Activity		ffordable housing Outputs and Indicators
Homeowner new construction	HUD Output Housing units	Output: affordable homeowner units created
or substantial rehabilitation	nousing units	Indicator 1: homeowner units substantially
		rehabilitated to applicable building code standards
		and made lead safe
		Indicator 2: homeowner units newly
		constructed to applicable building code standards
		Indicator 3: housing units met one or more of
		the following standards: air infiltration reduced by
		20%, LEED certification eligible, HERS rating of 4 stars
		(rehab) or 5 stars (new construction), or Michigan
		Energy Code compliance
		Indicator 4: homeowner units remain
		affordable for five (5), ten (10), or fifteen (15) years
Renter new construction or	Housing units	Output:affordable renter units created
substantial rehabilitation		Indicator 1: renter units substantially
		rehabilitated to applicable building code standards
		and made lead safe
		Indicator 2: renter units newly constructed to
		applicable building code standards
		Indicator 3: renter units met one or more of
		the following standards: air infiltration reduced by
		20%, LEED certification eligible, HERS rating of 4 stars
		(rehab) or 5 stars (new construction), or Michigan
		Energy Code compliance
		Indicator 4: renter units remain affordable for
		five (5), ten (10), fifteen (15) years, or twenty (20)
		years
		Indicator 5: renter units that provide
		supportive housing for people with disabilities or
		other special needs populations

Activity	HUD Output	Outputs and Indicators
Access Modifications	Housing units	Output: housing units provided with an
	-	environmental assessment for the purpose of making
		recommendations for accessibility modifications
		Indicator: assessed units modified to improve
		accessibility
Code Enforcement	Housing units	Output: code violation cases continued or
		initiated
		Indicator: housing units brought into
		compliance
Homeowner Minor Repair	Housing units	Output: units receiving minor home repairs
		Indicator 1: units where a health or safety
		hazard is corrected
		Indicator 2: units where affordability is
		improved
		Indicator 3: units where home security is
		increased
		Indicator 4: units where the life of the
		structure is lengthened
Homeowner Rehabilitation	Housing units	Output: units repaired to City Rehabilitation
		standards
		Indicator: units made lead safe

Outcome 4: Improve the condition of existing housing

Outcome 5:	Foster engaged, connected, and resilient neighborhoods

Activity	HUD Output	Outputs and Indicators		
Neighborhood Leadership and	People	Output: people were informed or educated on		
Civic Engagement		neighborhood leadership or civic engagement		
		opportunities		
		Indicator 1: people indicated the		
		neighborhood leadership or civic engagement		
		information was beneficial		
		Indicator 2: people became engaged in a		
		leadership role in their neighborhood		

Outcome 6: Improve community safety				
Activity	HUD Output	t Outputs and Indicators		
Neighborhood-based Public Safety	People	Output: people informed or educated on public safety topics		

1 age 230
Indicator 1: people who indicated the public
safety information received was beneficial
Indicator 2: housing units or public spaces that
received safety improvements

Outcome 7: Improve economic opportunity					
Activity	HUD Output	HUD Output Outputs and Indicators			
Job training/job readiness	People	Output: people who received job training or job readiness training/services Indicator: people successfully completed the training program			

Outcome 8: Enhance neighborhood infrastructure					
Activity HUD Output Outputs and Indicators					
Improvements to streets, sidewalks, parks, or public facilities/infrastructure	People	Output:streets, sidewalks, parks, or publicfacilities/infrastructure improvedIndicator:people who benefited fromimproved streets, sidewalks, parks, or publicfacilities/infrastructure			
Tree Planting	People	Output: trees planted in rights-of-ways or on other public property Indicator: people who benefited from an improved neighborhood as a result of tree planting			

Other				
Activity	HUD Output	Outputs and Indicators		
Admin/Planning	N/A	Output:applications submitted for community-wide funding to end homelessness Indicator 1: funding allocations received for disbursement in the community Indicator 2: strategic initiatives completed and published		

*Additional performance measures may be developed for identified priority needs.

Appendix E - ESG Financial Guidelines

These Financial Assistance Guidelines are the only guidelines to be used to administer City ESG financial assistance. <u>Agencies may not impose any additional eligibility criteria</u>. Failure to comply with these guidelines may result in revocation of awarded funds and nonpayment of case management funds for the agency. Guidelines are subject to revision based on changes in state and/or federal requirements.

- 1. <u>Coordinated Entry</u>. Providers shall only accept referrals from the community's coordinated entry and will refer all households seeking assistance to the coordinated entry for initial assessment (domestic violence agencies shall use local crisis assessment protocol). Providers must comply with all applicable requirements of the CoC's Coordinated Entry Policy.
- 2. <u>Rent Reasonableness</u>. Rent for the assisted unit must not exceed the lesser of Fair Market Rent (FMR) or HUD's rent reasonableness standard. If the gross rent for the unit exceeds either the rent reasonableness standard or FMR, ESG may not be used for any portion of the rent, even if the household is willing and/or able to pay the difference. Rent reasonableness is determined by considering the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities provided by the owner. Comparable rents can be checked by using a market study of rents charged for units of different sizes in different locations or by reviewing advertisements for comparable rental units.
- 3. <u>Habitability Standards</u>. ESG funds cannot be used to help a participant remain in or move into housing that does not meet the minimum habitability standards at 24 CFR 576.403(c). Habitability standards must be verified for participants receiving any combination of rental assistance, financial assistance, and/or services.
- 4. <u>Lead-Based Paint Inspections</u>. Lead-based paint inspections are required for all ESG-assisted units constructed before 1978 that are or will be occupied by a child under the age of six (6). For lead-based paint requirements, see 24 CFR part 35, subparts A, B, H, J, K, M, and R, which apply to all housing occupied by ESG program participants.
- 5. <u>Housing Stability Case Management</u>. While providing homelessness prevention or rapid re-housing assistance, the program participant must meet with a case manager not less than once per month to assist the participant in ensuring long-term housing stability. A housing stabilization plan must be developed to assist the participant in retaining housing after ESG assistance ends.
- 6. <u>Rental Assistance Agreement</u>. Assistance may only be provided in cases where a rental assistance agreement is in place between the provider and property owner. The agreement must include provisions required at 24 CFR 576.106(e).
- 7. <u>Lease Agreement</u>. Each participant receiving rental assistance must have a legally binding, written lease for the rental unit. The lease must be between the owner and participant and include provisions required at 24 CFR 576.106(g).
- 8. <u>Unallowable Costs</u>. City ESG funds may not be used for the following:
 - Mortgage payments
 - Mortgage arrearages including land contracts
 - Hotel/motel vouchers
 - Direct payments to program participants

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			Prevention Homeless Categories 2- 4, At Risk of Homeless Categories 1-3	Rapid Re- Housing Homeless Category 1	Guidance Payments issued to a third party
	Rental Assistance Total rental assistance cannot exceed six (6) months during any one-year period	Rental Arrearages	 One-time payment Not to exceed six (6) months May include late fees 	Not available	 Households shall have an annual income below 30% of the median family income Lease and rental assistance agreements required Units cannot exceed HUD Fair Market Rent and must comply with HUD's standard of rent reasonableness Habitability inspection in accordance with 24 CFR 576.403 required before assistance is provided
Rental Assistance		Short-Term Rental Assistance	 Not to exceed three (3) months Households must have an annual income below 30% of the median family income at intake and re-evaluation (every three (3) months) 	 Not to exceed three (3) months 	 Cannot be used with other subsidies Lease and rental assistance agreements required Units cannot exceed HUD Fair Market Rent and must comply with HUD's standard of rent reasonableness Habitability inspection in accordance with 24 CFR 576.403 required before assistance is provided Monthly case management provided by qualified staff required Housing stabilization plan must be developed and entered into HMIS
		Medium- Term Rental Assistance	 Not to exceed twelve (12) months Households must have an annual income below 30% of the median family income at intake and re-evaluation (every three (3) months) 	 Not to exceed twelve (12) months 	 Cannot be used with other subsidies. Lease and rental assistance agreements required Units cannot exceed HUD Fair Market Rent and must comply with HUD's standard of rent reasonableness Habitability inspection in accordance with 24 CFR 576.403 required before assistance is provided Monthly case management provided by qualified staff required Housing stabilization plan must be developed and entered into HMIS
vices	- 8	Security Deposit	Available	Available	 Not to exceed one and a half (1.5) times the monthly rent
bilization Serv	Financial Assistance	Utilities	Arrearage requires shut off notice	available if enabling utilities to be turned on at new address	 No more than twelve (12) months of utility payments is allowed, including any arrearages Eligible services are gas, electric, water, and sewage
Housing Relocation and Stabilization Services	ces	Housing Search and Placement	Available	Available	 Assisting participants in locating, obtaining, and retaining permanent housing Assessment of housing for compliance with habitability, lead-based paint, and rent reasonableness
	Services	Strengths- Based Housing Stability Case Management	Required for all prevention services with the exception of arrearages	Required for all rapid re-housing services	 Strengths-based approach to enhance participant's housing stability, promote linkages to community resources, and assist the household with the development of a homeless risk prevention plan Cannot exceed 30 days during the period the participant is seeking permanent housing