



# Kent County, City of Grand Rapids and City of Wyoming

Regional Consolidated Housing and Community Development Plan

*Five-Year Strategy*  
*July 1, 2016 – June 30, 2021*



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# Executive Summary

## SECTION I: EXECUTIVE SUMMARY - 24 CFR 91.200(c), 91.220(b)

### Introduction

Kent County, the City of Grand Rapids and the City of Wyoming have worked together to develop a Regional Consolidated Housing and Community Development Plan for FY 2016-2020 (July 1, 2016 through June 30, 2021). The five year plan, referred to as a “Consolidated Plan,” will guide each jurisdiction’s investment of funds received from the following programs:

**Table 1.1: Formula Grant Programs**

Formula Grant Program	Kent County	Grand Rapids	Wyoming
<b>The Community Development Block Grant Program (CDBG)</b>	☑	☑	☑
<b>The HOME Investment Partnership Program (HOME)</b>	☑	☑	*
<b>The Emergency Solutions Grant Program (ESG)</b>		☑	

\* The City of Wyoming and Kent County formed a HOME Consortium in 2010. Kent County administers the funds, with the City of Wyoming having input on its share of the funds and applications from area developers with proposed projects in Wyoming.

The Consolidated Plan consists of the following Sections:

- The **Process** describes the consultation and citizen participation process undertaken to collect information from residents and stakeholders on community conditions and needs.
- The **Needs Assessment** analyzes needs related to affordable housing, special needs housing, community development and homelessness.
- The **Market Analysis** examines demographics, the supply of affordable units, the regional housing market and other conditions that impact community needs and the programs that address these needs.
- The **Strategic Plan** identifies specific goals for each jurisdiction based on the highest priority needs informed by the Needs Assessment, Market Analysis, and extensive consultation with community groups and citizens.

The plan will also include the first year (2016) Annual Action Plan for each of the three jurisdictions, which will describe the planned investment of federal resources to implement specific activities that meet the year’s strategic goals.

Kent County and the cities of Grand Rapids and Wyoming engaged in a coordinated planning process that recognizes that 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.

## **Data**

The Consolidated Plan was developed based on both quantitative and qualitative data from multiple sources. Primary data sources include the 2008-2012 Comprehensive Housing Affordability Strategy (CHAS) and 2008-2012 American Community Survey (ACS), the most recent data provided by HUD specifically for the Consolidated Plan. Other local and national sources of data, as noted in the document, provide both additional context and, where available, updates on demographic, economic, and housing market trends. The data is supplemented by qualitative data gathered through extensive outreach efforts that included focus groups, individual consultations, and resident surveys.

## **Needs and Market Conditions**

Following an economic downturn and foreclosure crisis that peaked in 2009-2010, the Kent County region has recovered more rapidly than many other regions in Michigan. This recovery has led to improved housing markets and employment growth, benefiting many residents. At the same time, lower-income residents are facing greater challenges in finding affordable housing as rents and home prices are increasing more rapidly than wages. These residents are often “housing cost burdened” as they pay more than 30 percent of their household income for housing. Housing cost burden is the most common housing problem among both low-income renters and owners in the region and, given market trends, will likely be an issue requiring continued attention. A high priority identified during the consultation process and needs assessment is the continued support for housing opportunities for a range of incomes in neighborhoods and for improved transportation options to connect residents to jobs that pay a living wage.

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## 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 2016 – 2020 Regional Consolidated Plan was gathered through multiple means.

- Nine different focus groups were conducted during July and August of 2015. Regional focus groups were held on the topics of Affordable Housing, Economic Development, Human Services, Homelessness, and Infrastructure and Transportation. Jurisdiction-specific focus groups included the City of Wyoming, Grand Rapids Neighborhood Associations, and Kent County cities, villages, and townships.
- A survey that was distributed in electronic and hard copy format, in both English and Spanish, received 1,970 responses from residents throughout Kent County between August 3, 2015 and September 3, 2015.
- A public hearing on housing and community development needs was held before the Grand Rapids City Commission on September 8, 2015. In addition to public notices in the *Grand Rapids Press* (daily general circulation paper), *The Grand Rapids Times* (an African-American weekly paper), and *El Vocero Hispano* (a Hispanic weekly paper), an email invitation for comment was extended to all current City subrecipients/contractors and to other City partners. No comments were received.
- On November 4, 2015, the Wyoming Community Development Committee, a citizen commission appointed by the City Council, evaluated all public comment and recommended to the Wyoming City Council approval of the goals and priority needs identified in the FFY 2016 – FFY 2020 HCD Plan.

**Public Hearing and Comment Period on Draft HCD Plan.** Kent County and the cities of Grand Rapids and Wyoming held a joint 30-day public comment period on the full draft FFY 2016 – FFY 2020 Housing and Community Development Plan from December 16, 2015 – January 14, 2016. Each jurisdiction held a separate public hearing for citizen input. A hearing was held before the Grand Rapids City Commission on January 12, 2016. Hearings were held at the Kent County Community Development Department Office and before the Wyoming City Council on January 18, 2016. 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 in the Community Development Department Offices for Kent County and the cities of Grand Rapids and Wyoming, on Kent County and Cities of Grand Rapids and Wyoming websites, and at the Grand Rapids Public Library (main branch) and Wyoming Public Library.

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## Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The primary objective of HUD's Entitlement Programs is to develop viable communities through the provision of decent housing, a suitable living environment, and expanded economic opportunities. To this end, Kent County and the cities of Grand Rapids and Wyoming identified eight shared goals that address current and anticipated community development needs. Although, given local conditions, each jurisdiction may place different emphasis on specific goals, the framework that has been developed recognizes shared opportunities and challenges.

- **Goal 1: Improve the Condition of Existing Housing.** Rehabilitate and preserve owner- and renter-occupied housing to bring units to code standard or provide safety improvements, energy efficiency improvements, access modifications, or treatment of lead or other home hazards.
- **Goal 2: Increase the Supply of Affordable Housing.** Create affordable housing through new construction and rehabilitation for homeowners and renters, including permanent supportive housing.
- **Goal 3: Improve Access to and Stability of Affordable Housing.** Increase opportunities for housing stability through homebuyer down payment assistance, tenant based rental assistance and other support; fair housing education and enforcement, legal assistance for housing matters, and financial/homeownership counseling. Assist homeless individuals and families to stabilize in permanent housing after experiencing a housing crisis by providing client-appropriate housing and supportive service solutions; and provide homeless households with rapid re-housing rental assistance to move them as quickly as possible into permanent housing.
- **Goal 4: Reduce Blight and Code Violations.** Improve public health and safety, reduce blighting influences, and improve property values through code enforcement and clearance of blighted structures or structures in flood-prone areas.
- **Goal 5: Increase Civic Engagement and Public Safety.** Supports: 1) quality of life and sense of community in neighborhoods by decreasing or preventing crime; 2) neighborhood leadership and civic engagement as the means to build great neighborhoods; and 3) disaster mitigation and planning activities.
- **Goal 6: Enhance Infrastructure and Public Facilities.** Enhance publically-owned facilities and infrastructure such as parks, streets, sidewalks, streetscapes and other public infrastructure and facilities, including improving accessibility to meet Americans with Disabilities Act (ADA) standards.

- **Goal 7: Increase Access to Jobs, Education and Other Services.** Increase access to jobs, education, health and wellness, recreation, and health and social service activities.
- **Goal 8: Increase Economic Opportunities.** Enhance economic stability and prosperity by increasing economic opportunities for residents through job readiness and skill training, promotion of entrepreneurship (including among culturally diverse populations), façade improvements, and other strategies.

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### Evaluation of past performance

Each of the three jurisdictions administer robust community development programs that have made substantial progress in meeting their previous five year goals, and each takes responsibility for ensuring compliance with all rules and regulations associated with their respective HUD entitlement grant programs. Recognizing that the evaluation of past performance plays a critical role in ensuring that the jurisdictions and their subrecipients are implementing effective programs that align with their long range goals, each jurisdiction evaluates its performance on a regular basis. Detailed progress evaluations can be found in each jurisdiction's Consolidated Annual Performance and Evaluation Reports (CAPERs) posted on their respective web sites.

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### Summary of public comments

A total of three (3) organizations provided written comment on the FFY 2016 – FFY 2020 Consolidated Plan. No verbal comments were received.

- One organization provided information on the estimated number of families in need of housing assistance who are victims of domestic violence and sexual assault. This information was incorporated into the final FFY 2016 – FFY 2020 Consolidated Plan.
- One organization asked several questions about the plan. While responses were provided to the organization, no change to the plan was necessitated.
- One organization offered a number of comments and recommendations with a focus on how housing strategies can be leveraged to improve the health and wellbeing of children and families. Ten (10) of fourteen (14) recommendations were incorporated into the final FFY 2016 – FFY 2020 Consolidated Plan.

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

As noted above, four (4) recommendations that focus on how housing strategies can be leveraged to improve the health and wellbeing of children and families were not accepted. Kent County and the City of Wyoming each declined to update a Priority Need from Low to High. Specifically, the City of Wyoming, recognizing only one recommendation (out of hundreds) to upgrade affordable rental housing from low to high, maintained the priorities as established by unanimous recommendation of the Wyoming Community Development Committee, and the priorities established by the Wyoming City Council and their adoption of the 2013 City of Wyoming Analysis of Impediments to Fair Housing Choice and Housing Needs Assessment. Housing and code enforcement is a local government issue in the State of Michigan. Kent County declined to upgrade the priority for the outcome that addresses housing and code enforcement from low to high as the County does not have jurisdiction over this issue. Local units of government shared and determined that priority issues are expansion of target areas and affordable housing development.

# The Process

## SECTION II: THE PROCESS

### Introduction

The regional Consolidated Plan was developed under the leadership of the Community Development Departments of Kent County and the cities of Grand Rapids and Wyoming. This section summarizes the extensive consultation and citizen outreach conducted both collectively and individually by the regional consolidated plan jurisdictions.

### 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.

**Table 2.1: Responsible Agencies**

Grant Program	Grantee	Agency
<b>CDBG Administrator</b>	Grand Rapids	Community Development Department
<b>HOME Administrator</b>	Grand Rapids	Community Development Department
<b>ESG Administrator</b>	Grand Rapids	Community Development Department
<b>CDBG Administrator</b>	Kent County	Housing and Community Development
<b>HOME Administrator</b>	Kent County and City of Wyoming Consortium	Housing and Community Development
<b>CDBG Administrator</b>	City of Wyoming	Community Development Department

Narrative

**Table 2.2: Consolidated Plan Public Contact Information**

Kent County	Grand Rapids	Wyoming
Linda Likely Director of Housing and Community Development Community Development Department Kent County <a href="mailto:linda.likely@kentcountymi.gov">linda.likely@kentcountymi.gov</a> 82 Ionia Avenue NW, Suite 390 Grand Rapids, MI 49503	Connie M. Bohatch Managing Director of Community Services Community Development Department City of Grand Rapids <a href="mailto:cbohatch@grcity.us">cbohatch@grcity.us</a> 300 Monroe Avenue, NW, Suite 460 Grand Rapids, MI 49503	Rebecca Rynbrandt Director of Community Services Planning and Development Department City of Wyoming <a href="mailto:RynbranB@wyomingmi.gov">RynbranB@wyomingmi.gov</a> 1155 28 <sup>th</sup> Street SW Wyoming, MI 49509

## CONSULTATION - 91.100, 91.200(B), 91.215(L)

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

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.

An extensive process was undertaken to engage residents and community organizations in the identification of housing and community development needs and priorities. Nine focus groups were facilitated that included six regional topical focus groups and three focus groups that considered issues facing each of the three jurisdictions. Almost 140 stakeholders participated in these focus groups. Nearly 2,000 residents from across Kent County completed extensive surveys on community conditions, needs and priorities. Separate interviews were conducted with other stakeholders. Input was also sought from other planning processes, such as the Continuum of Care's Action Plan to End Homelessness, and the City of Grand Rapids's Great Housing Strategies plan, which provides a framework for meeting current and future housing needs in Grand Rapids.

The following provides additional details on these coordination activities:

**Stakeholder Interviews:** Between May and October of 2015, stakeholder interviews were conducted with particular organizations serving Grand Rapids, Wyoming and the balance of Kent County about special topics.

**Survey:** A resident survey seeking input on housing and community development conditions and priorities was distributed in electronic and hard copy form, in both English and Spanish, to a broad range of stakeholders and the general public. Notice of the survey was made available via a press release. Each jurisdiction made the survey available on its web site and distributed the survey link through its respective email network. Hard copies of the survey were provided upon request. The survey received almost 2,000 responses across all three jurisdictions between August 3, 2015 and September 4, 2015. There were 700 surveys completed by Grand Rapids residents, 785 surveys from Wyoming residents, and 512 surveys from those living in the balance of Kent County.

**Stakeholder Focus Groups:** Nine different focus groups were conducted, both regional and local in nature, in order to gather input on community development needs throughout Kent County. A range of community organizations and public and private stakeholders were invited to participate in these focus groups.

During the regional focus groups, demographic, housing and economic data was presented to participants to both inform discussions and receive qualitative feedback. Priority need input was gathered through both group discussions and a voting exercise.

The jurisdiction specific focus groups also included a presentation of data followed by discussion of priority needs. The meeting held with Grand Rapids Neighborhood Associations funded with CDBG and Justice Assistance Grant funds focused on neighborhood conditions and needs, while the Kent County and Wyoming focus groups discussed needs throughout the entire jurisdictions.

**Table 2.3: Regional Focus Groups**

Focus Group	Date	Number of Participants
Affordable Housing	July 22, 2015 at 8:30 AM	11
Public Housing Authorities	July 23, 2015 at 11:00 AM	3
Economic Development	July 22, 2015 at 1:30 PM	8
Human Services	July 22, 2015 at 10:30 AM	10
Homeless/Continuum of Care	July 24, 2015 at 10:00 AM	15
Infrastructure and Transportation	July 23, 2015 at 9:00 AM	8

**Table 2.4: Jurisdiction-Specific Focus Groups**

Focus Group	Date	Number of Participants
Grand Rapids Neighborhood Associations	July 22, 2015 at 1:30 PM	12
Kent County Cities, Villages, and Townships	August 20, 2015 at 9:00 AM	13
Wyoming	August 20, 2015 at 1:00 PM	58

**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**

Kent County, Grand Rapids, and Wyoming jurisdiction staff are members of the Grand Rapids Area Coalition to End Homelessness (CTEH) Steering Committee, which serves as the local Continuum of Care. The participation of the three HUD Participating Jurisdictions on the Steering Committee is outlined in the Continuum of Care Governance Charter adopted in 2014. The Steering Committee meets a minimum of six times per year and the jurisdictions hold non-rotating seats. Through the Steering Committee, the three jurisdictions work directly with community agencies on a regular basis to address the needs of homeless persons. The CTEH is made up of several committees of the Continuum of Care including the Executive Committee, Nominating Committee, Funding Review Committee, HMIS Data Quality Committee, Coordinated Assessment Committee, System Coordination Committee, and other Work Groups as needed.

**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 of Grand Rapids administers Emergency Solutions Grant (ESG) grants funds. Staff consult and coordinate with the CTEH on an ongoing basis through regular communication with the CTEH Program Manager and through its participation in the Steering Committee and other subcommittees. Regular consultation ensures that the use of ESG funds is consistent with CoC priorities. Per HUD standards, performance measures are developed in consultation with the CoC and are taken into consideration when the CTEH evaluates applications for funding.

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

The jurisdictions consulted with the housing, social service and other agencies listed in Appendix A. The consultations aimed towards the following outcomes:

- Validation of demographic, housing and economic data used in the needs assessment and market analysis

- Identification of community conditions and priority needs
- Exchange of information on programs and resources that address the same community groups and populations

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

Efforts were made to include a wide range of community stakeholders in the consultation, focus group and survey process. No agencies were intentionally excluded from participation.

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

**Table 2.5 Local / Regional / Federal Planning Efforts**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
<b>Continuum of Care Action Plan to End Homelessness 2015-2017</b>	Grand Rapids Area Coalition to End Homelessness	This plan, adopted in April 2015, carries forward work that was started through the 10-Year Vision to End Homelessness. Homeless-related priority needs and goals are aligned with the CoC's Action Plan.
<b>Get the Lead Out!</b>	Healthy Homes Coalition	The Get the Lead Out! Action Plan (2007) is aligned with the goals of the Consolidated Plan to eliminate childhood lead poisoning in Grand Rapids.
<b>Transit Accessibility Study North Kent Transit Needs Assessment Ottawa County Needs Assessment</b>	Grand Valley Metro Council	The mission of the Grand Valley Metro Council, an alliance of West Michigan local governments, is to plan for the growth and development of the region, improvement of the quality of the community's life, and coordination of governmental services. These objectives are aligned with the efforts of the grantee local governments in such areas as transportation planning, infrastructure development, and economic growth.
<b>City of Grand Rapids Master Plan</b>	City of Grand Rapids Planning Department	The Consolidated Plan and the City's Master Plan (2002) share common themes for the future of Grand Rapids, including Great Neighborhoods, Vital Business Districts, A Strong Economy, Balanced Transportation, A City That Enriches Our Lives, and A City in Balance with Nature.
<b>Urban Forestry Plan</b>	City of Grand Rapids Public Services Department	The Grand Rapids Urban Forestry Plan (2009) and the HCD Plan recognize the urban forest as a significant infrastructure investment that provides economic, environmental, and quality of life benefits.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
<b>Analysis of Impediments to Fair Housing</b>	City of Grand Rapids Community Development	The Analysis of Impediments to Fair Housing (2015) and the HCD Plan support removing impediments to fair housing choice in the public and private sector.
<b>Sustainability Plan</b>	City of Grand Rapids Office of Energy and Sustainability	The City of Grand Rapids Sustainability Plan (2010) and the HCD Plan contain similar outcomes directly related to community needs and quality of life, including Economic Prosperity, Social Equity, and Environmental Integrity.
<b>Grand Rapids Housing Commission Plan</b>	Grand Rapids Housing Commission	The Grand Rapids Housing Commission Plan (2010) is the five-year plan of the Public Housing Authority of Grand Rapids, effective July 1, 2010. The Housing Commission Plan and Consolidated Plan overlap in multiple areas relating to the varied housing needs of households in Grand Rapids.
<b>Green Grand Rapids</b>	City of Grand Rapids Planning Department	A component of the City's Master Plan, Green Grand Rapids (2010) shares goals with the Consolidated Plan to improve the citywide infrastructure and quality of life, including balanced transportation, natural systems, and parks and recreation.
<b>Parks and Recreation Master Plan</b>	City of Grand Rapids Parks and Recreation Department	The Parks and Recreation Master Plan Update (2010) contains a revised inventory of the City's parks and greenspace. The Master Plan Update aligns with the goals of the Consolidated Plan to preserve and further develop land for these uses.
<b>Youth Master Plan</b>	City of Grand Rapids Community Development Department	The City of Grand Rapids Youth Master Plan (2010) contains outcomes and indicators in major developmental categories, with specific result statements for each of five age groups. The Youth Master Plan and Consolidated Plan overlap in the areas of crime prevention, leadership and civic engagement.
<b>Grand Rapids Vital Streets Plan</b>	City of Grand Rapids Community	The Grand Rapids Vital Streets initiative is developing a Vital Streets Master Plan to guide consistent street and sidewalk design principles into the future. The plan will consolidate complete street principles developed by the Sustainable Streets Task Force and endorsed by

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
	Development Department	voters in May 2014 to ensure that bicycling, pedestrians, transit and freight, transportation demand management and green infrastructure facilities all fit within the right of way.
<b>Area Specific Neighborhood Plans</b>	Various	Six (6) specific neighborhood plans in Specific Target Areas were reviewed in preparation of the Consolidated Plan. Planning initiatives in neighborhoods and along business corridors can inform the City of efforts occurring at the micro-local level, and where to best direct limited resources.
<b>Great Housing Strategies: Addressing Current and Future Housing Needs in Grand Rapids</b>	City of Grand Rapids	The Great Housing Strategies Plan (2015) 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.
<b>GR Forward</b>	Downtown Grand Rapids, Inc.	GR Forward focuses on the development of downtown Grand Rapids and the Grand River corridor, including the housing development needs in the core city for residents with a range of incomes.
<b>Hope Zones Believe 2 Become Neighborhood Initiative</b>	Grand Rapids Community College	The Believe 2 Become (B2B) initiative is designed to help children succeed in work, school, and life. The initiative focuses on four targeted neighborhoods engaging residents in community dialogue, empowering families and parents with opportunities to support the academic success of children, and expanding learning for students with experiences in school, after school, and in the summer.
<b>Michigan Street Corridor Plan</b>	City of Grand Rapids	Adopted by the City Commission in 2015, the Michigan Street Corridor plan discusses initiating desired land use changes, sequencing improvements to the transportation system and framing community conversation about the development of the corridor.
<b>Strengthening Neighborhoods Taskforce</b>	City of Grand Rapids	Strengthening Neighborhoods Taskforce recommendations developed from March 15, 2015 Neighborhoods Summit. Recommendations include how to strengthen neighborhoods through affordable housing and supporting neighborhood associations.
<b>Safe Alliance for Everyone (SAFE) Taskforce</b>	City of Grand Rapids	Safe Alliances for Everyone (SAFE) Taskforce recommendations, March 24, 2015. Recommendations included violence prevention investments, eliminating violent acts, activating economic opportunities, community engagement, and effective positive change in public institutions.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
<b>Analysis of Impediment to Fair Housing</b>	City of Wyoming	The Analysis of Impediments to Fair Housing (2013) and the Consolidated Plan support removing impediments to fair housing choice in the public and private sector.
<b>Housing Needs Assessment</b>	City of Wyoming	Incorporated as part of the Analysis of Impediments to Fair Housing (2013), the City of Wyoming conducted a housing needs assessment to identify market potential and priority needs in the City of Wyoming, compared to a regional market within a 20-minute driving distance of Wyoming.
<b>Wyoming 28 West</b>	City of Wyoming	28 West provides a long-term vision for 28th Street to become a sustainable, economically vibrant, walkable town center in Wyoming. The Wyoming DDA in cooperation with the business community, property owners, city leaders and citizens have focused their efforts on cultivating a new, vibrant destination in Wyoming, addressing such elements as orientation of buildings, building facades, streets, green space, landscaping and parking, .
<b>City of Wyoming 2035 Thoroughfare Plan</b>	City of Wyoming	The 2035 Thoroughfare Plan incorporates traffic data collected by the City of Wyoming and the Michigan Department of Transportation (MDOT) in 2008 and 2009. Using a transportation planning model developed by the Grand Valley Metropolitan Council (GVMC), the plan develops Average Daily Traffic projections for city thoroughfares, which were used to determine areas of need.
<b>Land Use Plan 2020</b>	City of Wyoming	Wyoming’s Land Use Plan 2020 provides long-range guidance for land use and development by considering a wide range of possible features.
<b>Recreation Plan 2013-2017</b>	City of Wyoming	Both the Recreation Plan and the Consolidated Plan identify priority needs for public services associated with youth and recreation-related activities.
<b>Wyoming Public Housing 2015-2019 5 – Year Plan</b>	Wyoming Housing Commission	The Public Housing and Consolidated Plan identify needs for affordable housing for residents in Wyoming.

**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))**

The following units of government and other public entities were invited to comment on the HCD Plan.

**Table 2.6: Units of Government and Other Public Entities**

- Kent County Health Department
- City of Grandville
- Grand Valley Metropolitan Council
- West Michigan Regional Planning Commission
- Grand Rapids Charter Township
- Michigan State Housing Development Authority
- Plainfield Charter Township
- Grand Rapids Housing Commission
- Kent County Housing Commission
- Wyoming Housing Commission
- Rockville Housing Commission
- City of Kentwood
- Algoma Township
- Alpine Township
- Cascade Township
- Village of Casnovia
- City of Kentwood
- City of Walker
- Gaines Township
- Grand Rapids Charter Township
- Nelson Township
- Village of Sand Lake
- Solon Township
- Village of Sparta

## CITIZEN PARTICIPATION

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### **Summary of citizen participation process/Efforts made to broaden citizen participation** **Summarize citizen participation process and how it impacted goal-setting**

Kent County and the cities of Grand Rapids and Wyoming held a joint 30-day public comment period on the full draft FFY 2016 – FFY 2020 Housing and Community Development Plan from December 16, 2015 – January 14, 2016. Each jurisdiction held a separate public hearing for citizen input. A hearing was held before the Grand Rapids City Commission on January 12, 2016. Hearings were held at the Kent County Community Development Department Office and before the Wyoming City Council on January 18, 2016. 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 in the Community Development Department Offices for Kent County and the cities of Grand Rapids and Wyoming, on Kent County and Cities of Grand Rapids and Wyoming websites, and at the Grand Rapids Public Library (main branch) and Wyoming Public Library.

**Citizen Participation Outreach**

<b>Mode of Outreach</b>	<b>Target of Outreach</b>	<b>Summary of response/ attendance</b>	<b>Summary of Comments received</b>	<b>Summary of comments not accepted and reasons</b>	<b>URL</b>
Public Meeting	1. Minorities 2. Non-English Speaking: Spanish 3. Persons with disabilities 4. Non-targeted/ broad community	A public hearing was held before the Grand Rapids City Commission on January 12, 2016. Hearings were held in the Kent County Community Development Department Office and before the Wyoming City Council on January 18, 2016. No comments were received.	No comments were received.	No comments were received.	N/A

<b>Mode of Outreach</b>	<b>Target of Outreach</b>	<b>Summary of response/ attendance</b>	<b>Summary of Comments received</b>	<b>Summary of comments not accepted and reasons</b>	<b>URL</b>
Newspaper Ad	1. Minorities 2. Non-English Speaking: Spanish 3. Persons with disabilities 4. Non-targeted/ broad community	No written comments were received.	No written comments were received.	No written comments were received.	N/A
Internet Outreach	Non-targeted/broad community	No written comments were received.	No written comments were received.	No written comments were received.	<a href="http://www.grcd.info">www.grcd.info</a> , <a href="http://www.accesskent.com">www.accesskent.com</a>
Electronic Mail Outreach	Subrecipients/ contractors and other partners identified in the Institutional Structure section of this Plan	Three (3) written comments were received.	One organization provided information on the estimated number of families in need of housing assistance who are victims of domestic violence and sexual assault. One organization asked several questions about the plan. One organization offered a number of comments and recommendations with a focus on how housing strategies can be leveraged to improve the health and wellbeing of children and families.	Four (4) of fourteen (14) recommendations that focus on how housing strategies can be leveraged to improve the health and wellbeing of children and families were not accepted. Kent County and the City of Wyoming each declined to update a Priority Need from Low to High.	N/A
Public Libraries	Non-targeted/broad community	No written comments were received.	No written comments were received.	No written comments were received.	N/A

**Table 1 – Citizen Participation Outreach**

# Needs Assessment

## SECTION III: NEEDS ASSESSMENT

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### Overview

The Needs Assessment examines needs related to affordable housing, special needs housing, community development and homelessness for Kent County and the cities of Grand Rapids and Wyoming. The Needs Assessment includes the following sections:

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

The Needs Assessment identifies those needs with the highest priorities which form the basis for the Strategic Plan section and the programs and projects to be administered. Most of the data tables in this section are populated with default data from the 2008-2012 American Community Survey (ACS) and the Comprehensive Housing Affordability Strategy (CHAS) datasets. CHAS datasets are developed for HUD by the U.S. Census Bureau based on the ACS. In addition to these data sources, the Needs Assessment is supplemented by more current data to provide context around the significant growth experienced by the region in recent years. Other housing studies by the three jurisdictions were also consulted. Qualitative data gained from an intensive consultation process that included nine focus groups and a resident survey further helped to guide and interpret the needs assessment. Other data sources are noted throughout the Plan.

The housing portion of the needs assessment focuses largely on households experiencing a housing problem. HUD defines housing problems as:

- Units lacking complete kitchen facilities;
- Units lacking complete bathroom facilities;
- Housing cost burden of more than 30 percent of the household income (for renters, housing costs include rent paid by the tenant plus utilities and for owners, housing costs include mortgage payments, taxes, insurance, and utilities); and

- Overcrowding which is defined as more than one person per room, not including bathrooms, porches, foyers, halls, or half-rooms.

Two of the three housing and community development entitlement programs, CDBG and HOME, operate under federally-established income limits. These limits are based on median family income for the Grand Rapids-Wyoming Metropolitan Statistical Area (MSA), currently defined as Barry, Kent, Montcalm, and Ottawa counties, and are adjusted annually. The Emergency Solutions Grants 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% of AMI. ESG activities are assumed to benefit low- and moderate-income persons.

The following table provides the current income limits subject to annual adjustments by HUD.

**Table 3.1: HUD Income Limits**

HUD Income Limits: Grand Rapids – Wyoming Metropolitan Statistical Area (MSA)				
Household Size	30% of Median Very Low Income	50% of Median Low Income	60% of Median	80% of Median Moderate Income
1	\$13,450	\$22,400	\$26,280	\$35,850
2	15,930	25,600	30,000	41,000
3	20,090	28,800	33,780	46,100
4	24,250	32,000	37,500	51,200
5	28,410	34,600	40,500	55,300
6	32,570	37,150	43,500	59,400
7	36,730	39,700	46,500	63,500
8	40,890	42,250	49,500	67,600

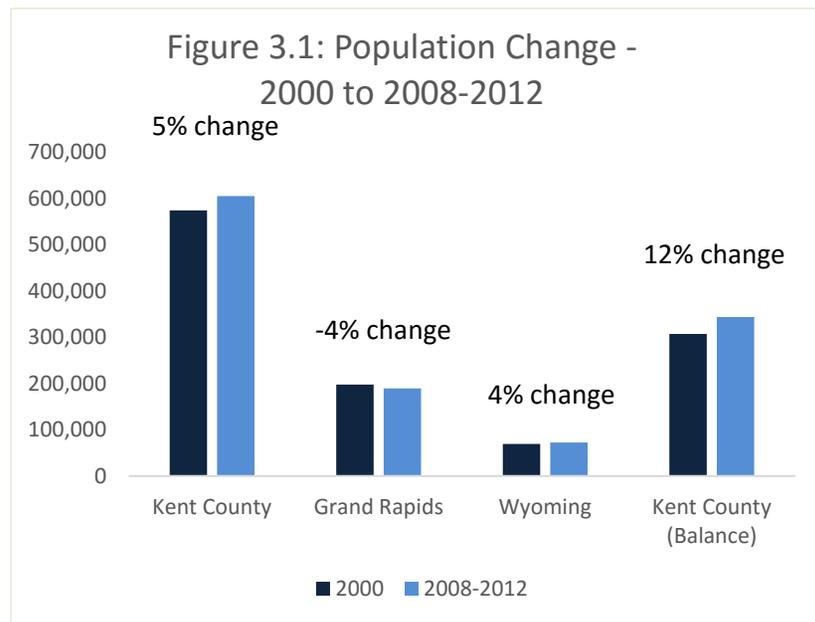
*Source: U.S. Department of Housing and Urban Development (HUD), effective March 6, 2015*

## HOUSING NEEDS ASSESSMENT - 24 CFR 91.205 (A,B,C)

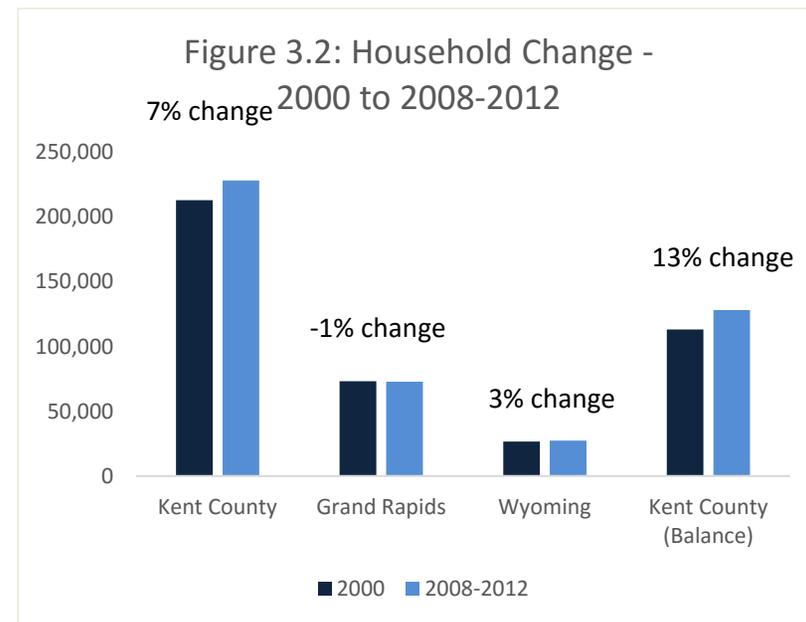
### Demographic Profile

Kent County is home to 605,244 people, comprised of 228,204 households. With over 189,000 people, the City of Grand Rapids is home to almost a third (31 percent) of the County’s residents. The City of Wyoming houses over 72,408 residents, or 12 percent of the population. The remaining 57 percent of residents live in the other cities, villages and townships that make up the balance of Kent County.

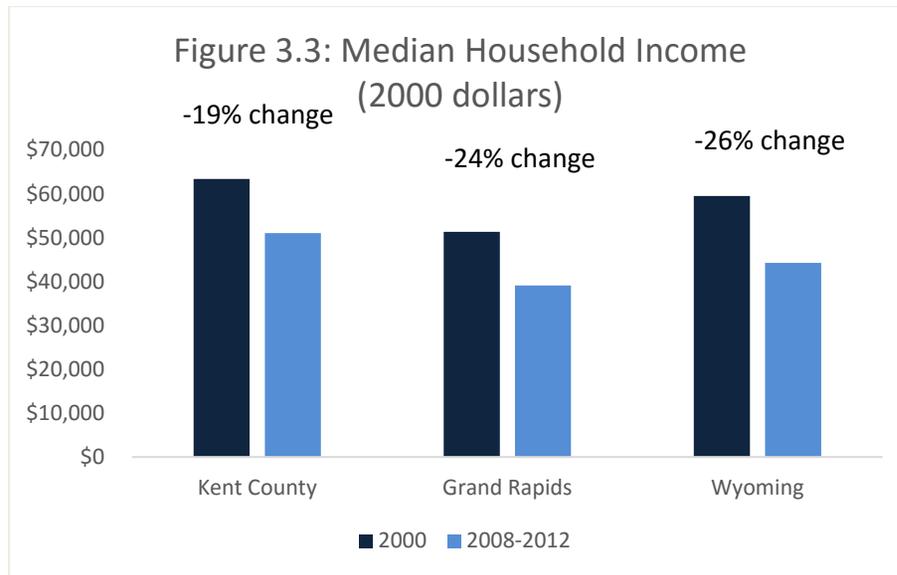
The median age in Kent County is just over 34 years old, more than four years younger than the median age in the State of Michigan. This is reflected by both a greater share of youth (0-18 year olds) as well as a lower share of persons over the age of 65 when compared to the State.



Source: 2000 Decennial Census and 2008-2012 ACS Estimates



Source: 2000 Decennial Census and 2008-2012 ACS Estimates



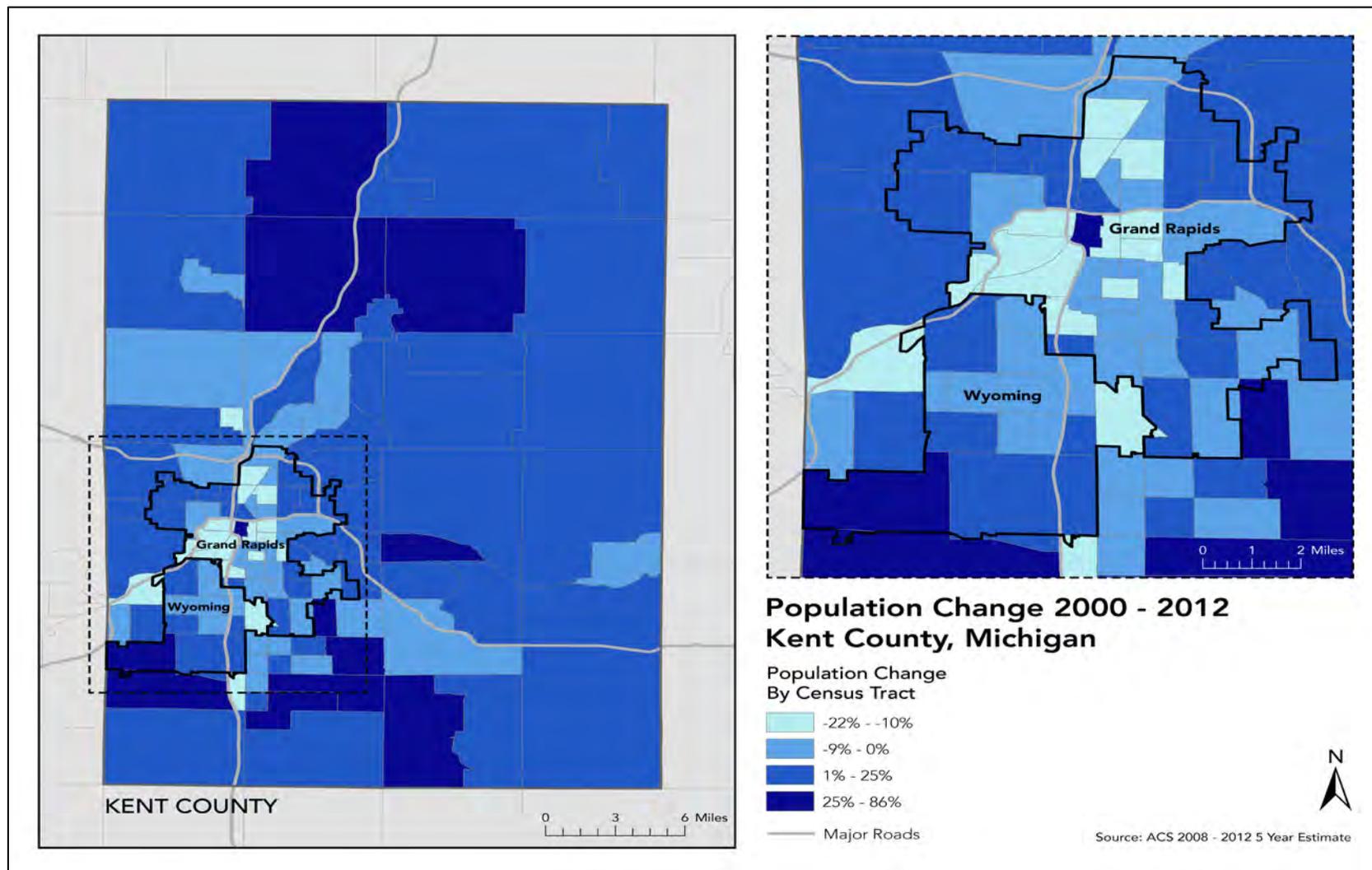
Source: 2000 Decennial Census and 2008-2012 ACS Estimates

- Unlike much of Michigan, population grew in Kent County from 2000 to 2008-2012, most notably in the suburbs and rural areas. Population in the balance of Kent County (excluding Grand Rapids and Wyoming) grew by 12 percent during this period.
- The trend of households change generally mirrors change in population for the same period.
- From 2000 to 2008-2012, median household income (adjusted for inflation) decreased by 19 percent in Kent County, with the greatest declines in Grand Rapids and Wyoming.
- Since 2012, recent estimates and forecasts show continued population growth in the region, especially in the suburban and rural areas.

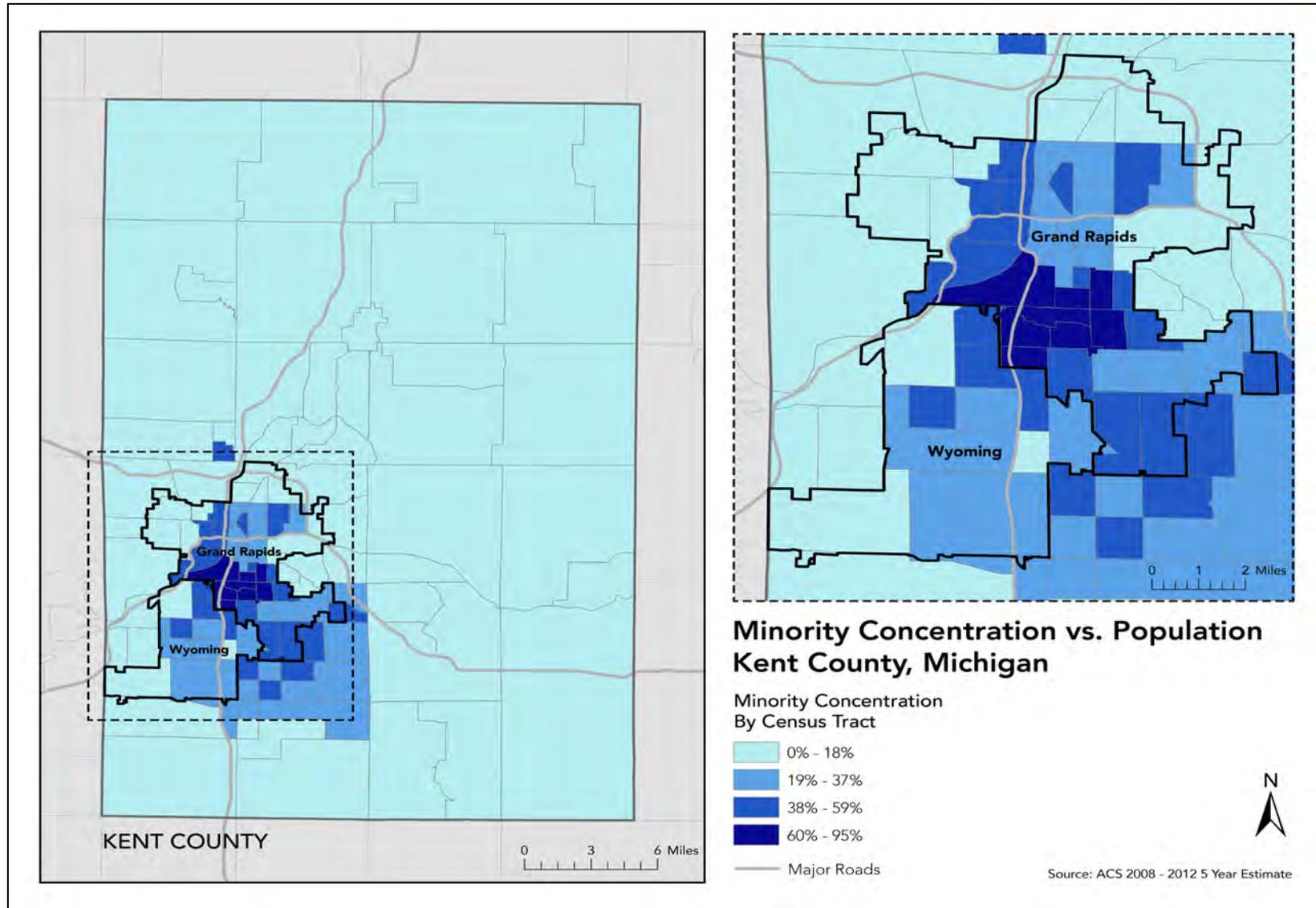
- As indicated in the Maps 3.1 and 3.2 below, population has grown throughout the Balance of Kent County at a fairly constant rate.
- The population in Wyoming has also consistently grown from 2000 to 2012.
- In Grand Rapids Population increased in the central core as well as in the outlying areas of the City. In the Census tracts surrounding the downtown core, the population has decreased slightly since 2000.
- When assessing the concentration of minority population in Kent County, the vast majority of the non-White population is located in Grand Rapids and Wyoming. In Grand Rapids, the population is concentrated in the downtown and southern portion of the City. In Wyoming, the non-White population is concentrated in the downtown and northern area of the City.
- As indicated in the Maps 3.3 and 3.4 below, the Census tracts with the highest median incomes are located in Kent County outside of Grand Rapids and Wyoming.
- The majority of downtown Grand Rapids Census tracts have median incomes below \$37,000. Similarly, the highest concentration of households living below poverty level are located in central Grand Rapids.
- Wyoming has a slightly higher median income than Grand Rapids and lower median income than the balance of Kent County.

- In Grand Rapids, the population is concentrated in the downtown and southern portion of the City. In Wyoming, the non-White population is concentrated in the downtown and northern area of the City.

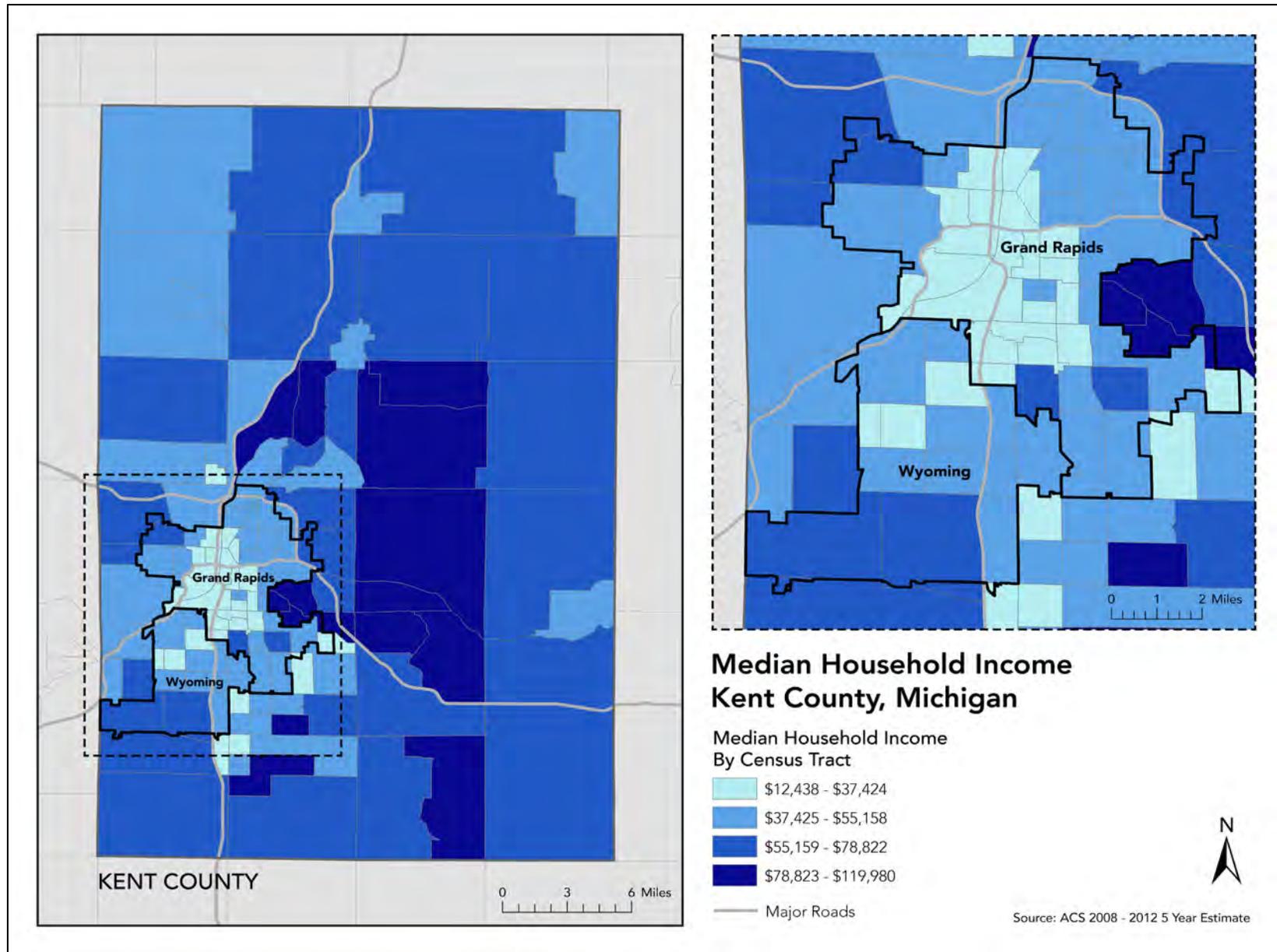
**Map 3.1: Population Change 2000 – 2012**



**Map 3.2: Minority Concentration vs. Population**



Map 3.3: Median Household Income



**Map 3.4: Persons Living Below Poverty Level**

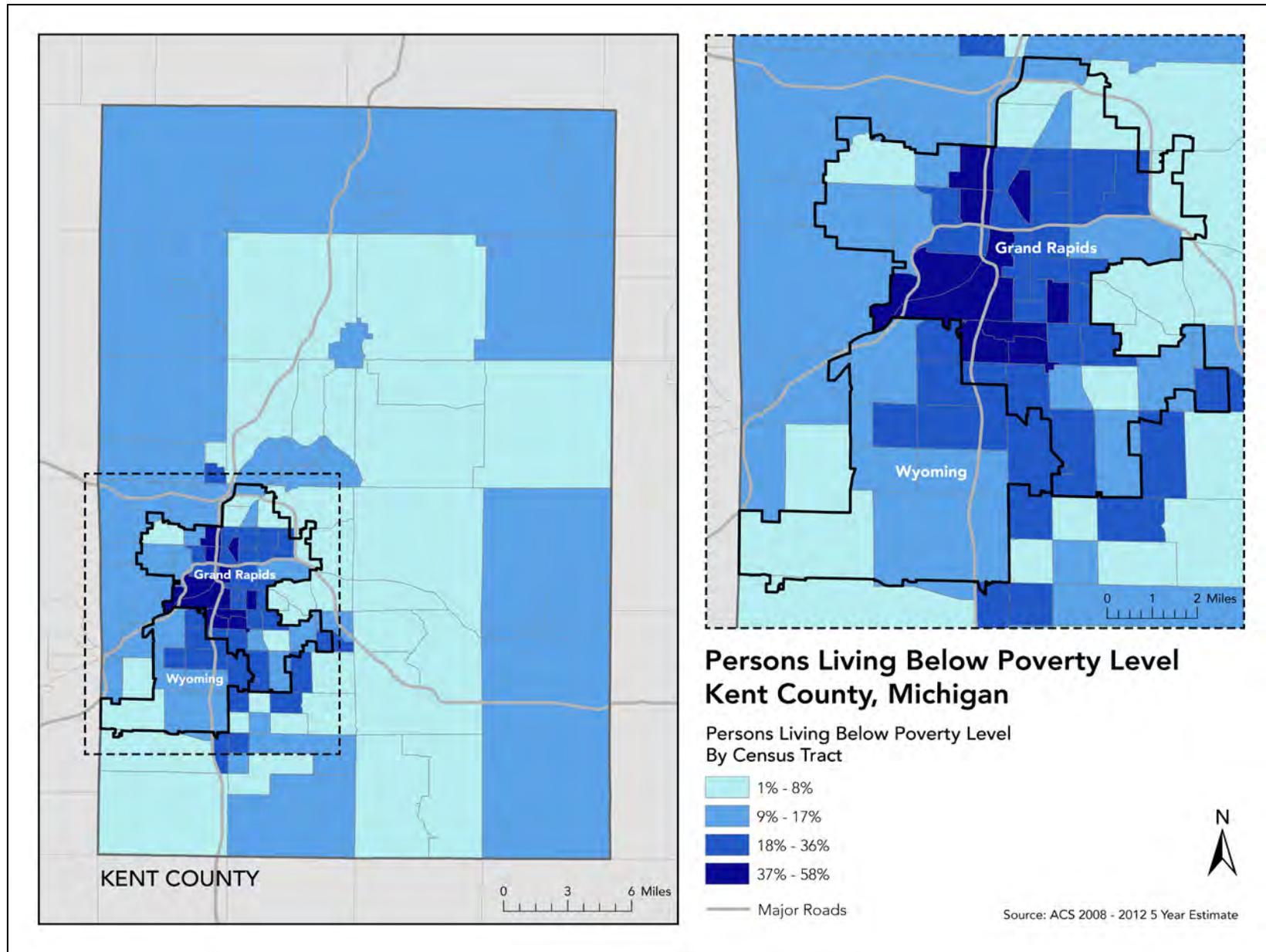
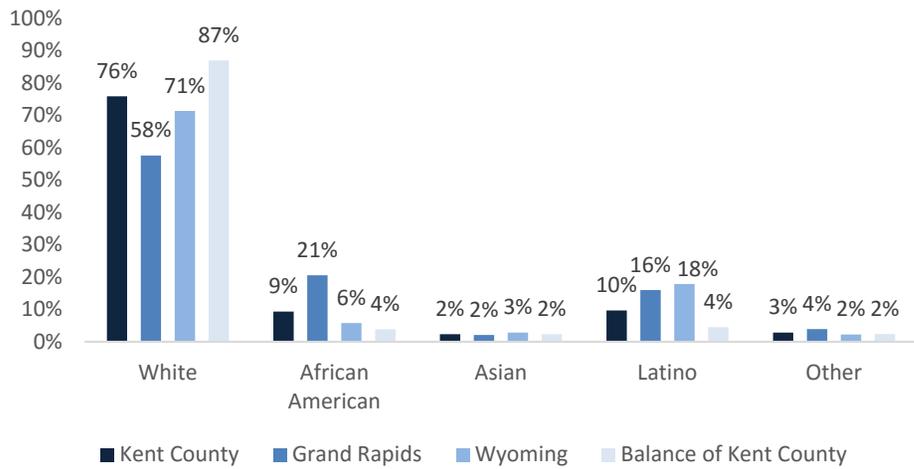


Figure 3.4: Race/Ethnicity - 2008-2012



Source: 2008-2012 ACS Estimates

- The majority of Kent County’s population is White (76 percent), with the highest concentrations in areas outside of Grand Rapids and Wyoming, which have shares of White population of 58 percent and 71 percent respectively.
- Eighteen percent of Wyoming’s population is Hispanic/Latino, more than double the 2000 level.
- African-American residents comprise 21 percent of Grand Rapid’s population, higher than the rest of the County.

## Household Profile

The majority of households in Kent County are small family households (defined as family households comprising 2-4 members). Both the cities of Grand Rapids and Wyoming have slightly greater shares of households with young children when compared to the Balance of Kent County, suggesting a younger population that may warrant more family housing and youth targeted programs.

**Table 3.2: Number of Households by Household Type**

Household Type	Kent County	Grand Rapids	Wyoming	Balance of Kent County
<b>Small Family</b>	101,860	28,605	21,785	60,760
<b>Large Family</b>	22,615	6,645	6,025	12,895
<b>Household Contains at least one person 62-74</b>	40,090	11,015	8,665	23,835
<b>Household Contains at least one person age 75+</b>	23,395	7,035	5,860	13,890
<b>Household with one or more children (6 or under)</b>	46,305	15,255	13,345	24,716
<b>Total Households</b>	228,210	72,790	56,915	128,155

NOTE: Total counts for CHAS data differ slightly from ACS estimates due to variations in margin of error and how the data is sampled. 2) Each household type is not mutually exclusive 3) this list of household types is not exhaustive and does not include all household types.

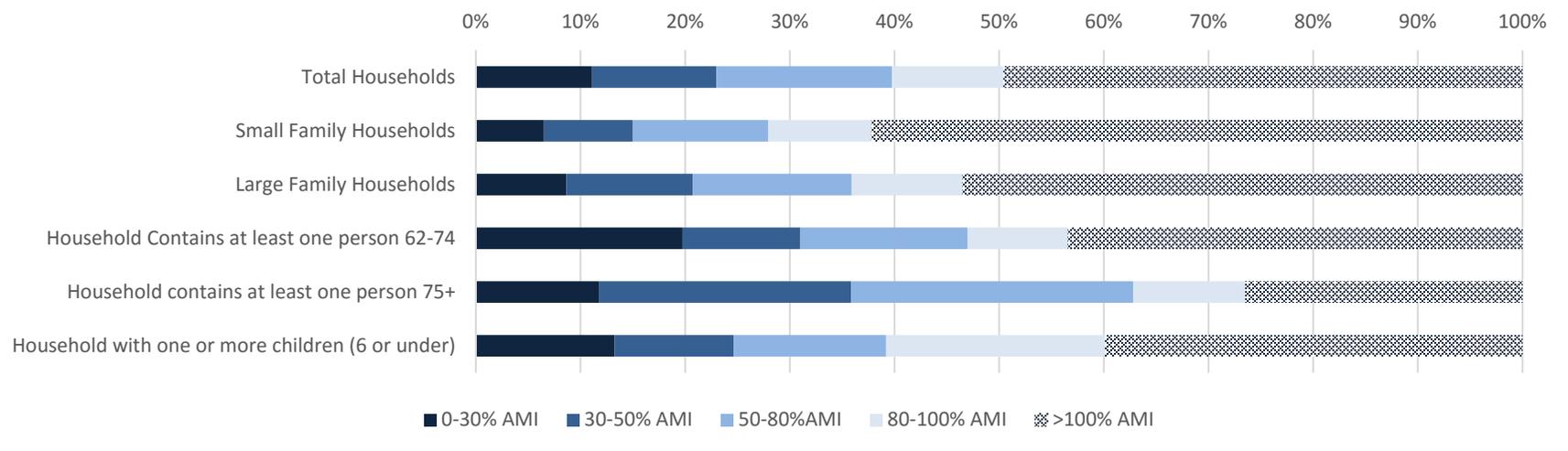
Source: 2008-2012 CHAS

The following figures provide a more detailed profile of Kent County, Grand Rapids and Wyoming households by income level and household type.

### ***Kent County***

The figure below provides a household profile of Kent County, including Grand Rapids and Wyoming, by income level. Kent County has a large share of low- and moderate-income elderly and family households with young children. While these two household types represent the largest share of low- and moderate-income households, the largest absolute total of low- and moderate-income households is small family households (family households with less than five people).

Figure 3.5: Household Profile by Income Level (Kent County)



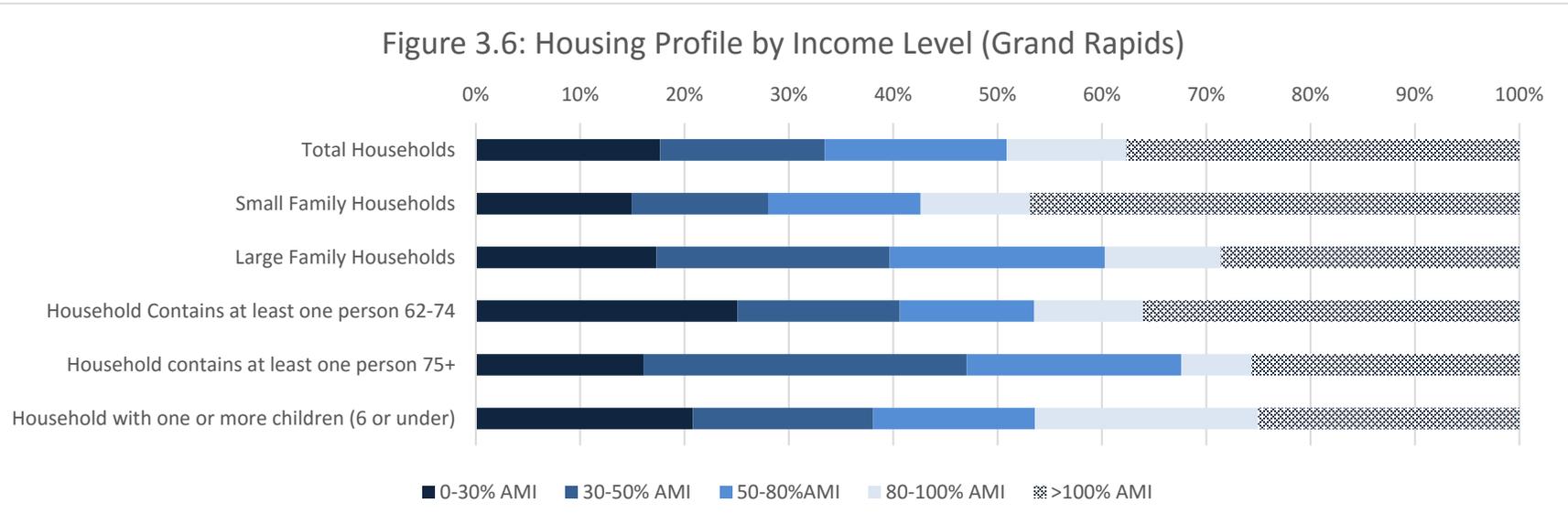
Source: CHAS 2008-2012

- Nearly 40 percent of all Kent County households have incomes between 0-80% AMI. Of these households:
  - 11 percent are extremely low-income
  - 12 percent are low-income
  - 17 percent are moderate-income
- More than 60 percent of households containing at least one person age 75 or older are low- and moderate-income and approximately 45 percent of households containing at least one person between ages 62-74 are low- and moderate-income.
- Nearly 40 percent of households with young children are at or below 80% AMI.

### **Grand Rapids**

Grand Rapids has a slightly greater share of low-income households when compared to Kent County as a whole. More than 60 percent of large family households and elderly households (with at least one person 75 years old or older) are low-income. Although the actual number of low-income large family households in Grand Rapids is much lower than Kent County as a whole, the share of total households in Grand Rapids is much higher.

Figure 3.6: Housing Profile by Income Level (Grand Rapids)



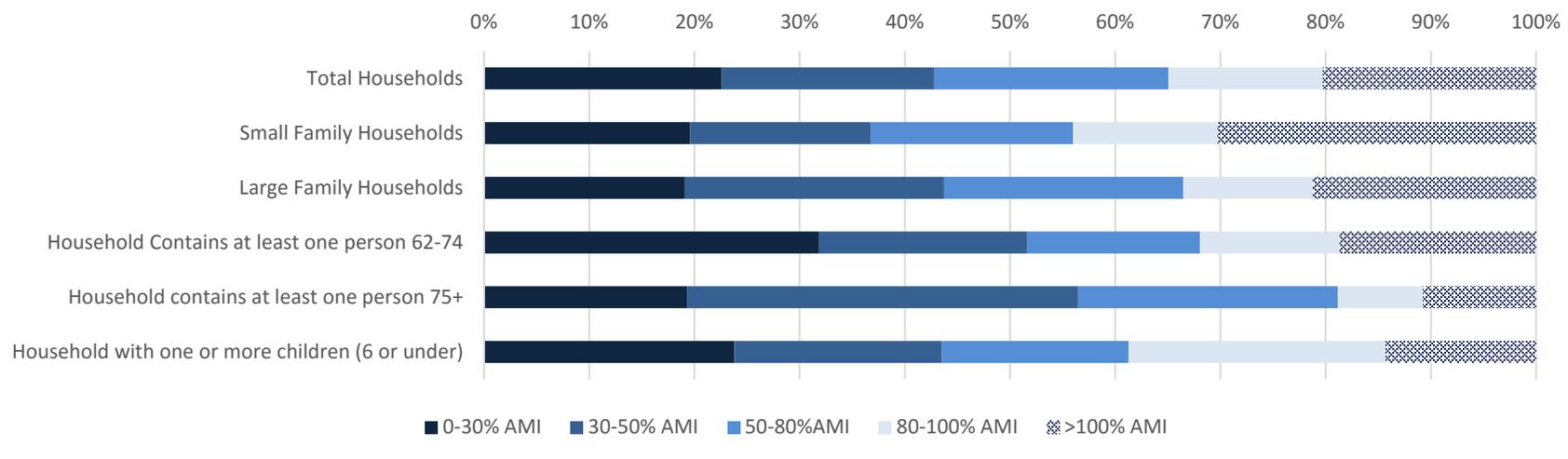
Source: CHAS 2008-2012

- Just over 50 percent of all households have incomes between 0-80% AMI. Of these households:
  - 18 percent are extremely low-income
  - 16 percent are low-income
  - 17 percent are moderate-income

### Wyoming

Compared to Kent County and Grand Rapids, Wyoming has a greater share of low-income households for every household type. The comparative prevalence of low-income households in each household type, especially for elderly and large family households suggests the need for programming targeted to both population types.

Figure 3.7: Household Profile by Income Level (Wyoming)



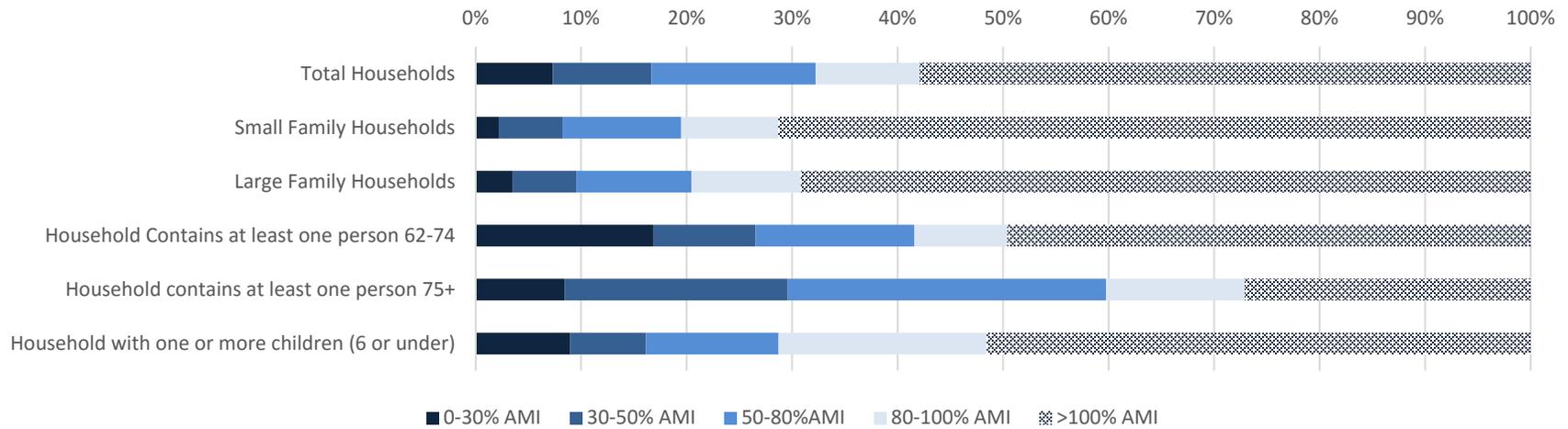
Source: CHAS 2008-2012

- Nearly 65 percent of all Wyoming households have incomes between 0-80% AMI. Of these households:
  - 22 percent are extremely low-income
  - 20 percent are low-income
  - 23 percent are moderate-income
- More than 80 percent of elderly households with at least one person over the age of 75 are low- or moderate-income
- More than 60 percent of households with young children are moderate-income or below and nearly 23 percent of these households earn less than 30 percent of AMI

### Balance of Kent County

In the balance of Kent County, the majority of households (66 percent) are not low- or moderate-income. However, despite the lower prevalence of lower income households when compared to the County as a whole, nearly 60 percent of elderly households in this area are low- or moderate-income.

Figure 3.8: Household Profile by Income Level (Balance of Kent County)



Source: CHAS 2008-2012

- 32 percent of Kent County households that reside outside of Grand Rapids and Wyoming have incomes between 0-80% AMI. Of these households:
  - 7 percent are extremely low-income
  - 9 percent are low-income
  - 16 percent are moderate-income
- While a relatively small share when compared to all small households, the largest absolute number of low-income households in Kent County is small family households (more than 9,000 households).

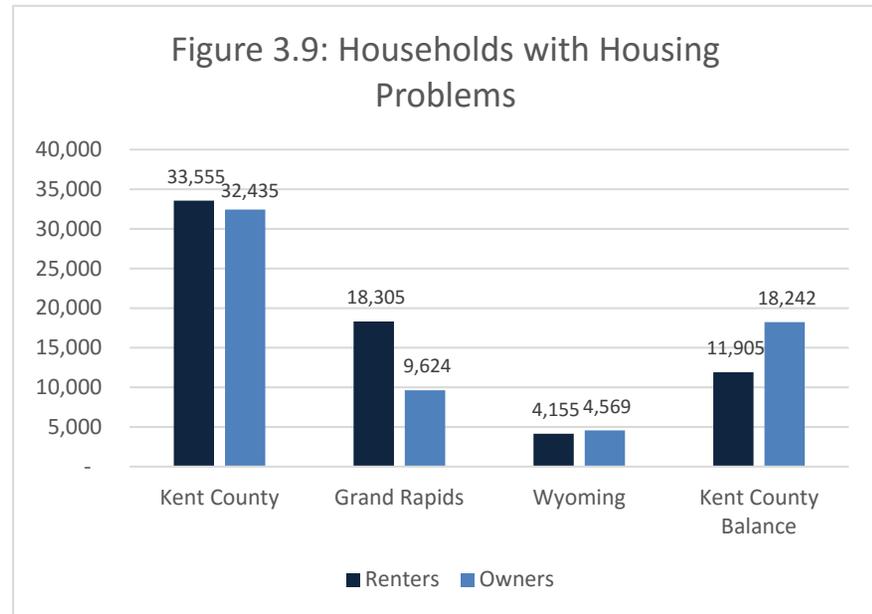
### Housing Problems

Lower income households have higher rates of housing problems. Housing problems are defined as houses: 1) Lacking complete kitchen facilities; 2) Lacking complete plumbing facilities; 3) Cost burden greater than 30 percent (share of income devoted to housing costs); and 4) More than one person per room (overcrowding).

Just under 66,000 Kent County households experience a housing problem. Despite the greater prevalence of owners in the County, households experiencing a housing problem are split relatively evenly between renters and owners. Over two thirds of households with housing problems in Grand Rapids are renters, while almost two thirds of households with housing problems in the balance of Kent County are owners.

Nearly 90 percent of the approximately 66,000 households with housing problems are due to cost burden or severe cost burden, impacting renters (93 percent) slightly more than owners (86 percent). As noted in the Market Analysis section, the share of cost burdened households in Kent County has been exacerbated by the rising cost of housing coupled with the stagnation of median income in the region. Consequently, it is likely that the share of cost burdened households will increase in the next five years.

The data tables below provide a profile of the types of housing problems experienced by renter and owner households in Kent County, Grand Rapids and Wyoming, as well as the balance of Kent County (excluding Grand Rapids and Wyoming).



Source: CHAS 2008-2012

## Kent County

**Table 3.3: Households with a Housing Problem (Kent County)**

Housing Problem	Renter Households					Owner Households				
	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total
<b>Substandard</b>	455	555	650	105	1,765	130	130	190	30	480
<b>Severely Overcrowded (and none of the above)</b>	210	110	125	15	460	15	55	100	25	195
<b>Overcrowded (and none of the above)</b>	580	565	305	75	1,525	85	150	290	175	700
<b>Severe Cost Burden (and none of the above)</b>	11,270	4,000	435	75	15,780	5,025	4,425	3,230	635	13,315
<b>Cost Burden (and none of the above)</b>	1,775	6,185	4,400	610	12,970	1,285	4,150	7,100	4,465	17,000
<b>Zero income (and none of the above)</b>	1,055	0	0	0	1,055	745	0	0	0	745

Note: Each housing problem count is exclusive of other housing problems and is listed in sequential order meaning that the count for each row indicates that those households have none of the problems listed above it, but may also have one of the problems listed below it. For example, households with substandard conditions may also be cost burdened, but would only be counted in the substandard row.

Source: CHAS 2008-2012

- The high level of cost burdened households noted above is representative of the rising housing costs in the area, especially when compared to only moderate median income growth in the region during the same time period.
- Renters are more likely to experience overcrowding than owner households. As identified in the Market Analysis, there is a smaller share of large renter units in the region. This, coupled with the high prevalence of cost burden, suggests that there may be a shortage of affordable family rental units (i.e. 3 bedroom or larger units in Kent County).

## Grand Rapids

**Table 3.4: Households with a Housing Problem (Grand Rapids)**

Housing Problem	Renter Households					Owner Households				
	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total
<b>Substandard</b>	185	375	310	75	945	35	30	55	20	140
<b>Severely Overcrowded (and none of the above)</b>	195	85	110	15	405	10	25	85	4	124
<b>Overcrowded (and none of the above)</b>	265	305	165	75	810	30	85	90	80	285
<b>Severe Cost Burden (and none of the above)</b>	6,460	2,205	135	45	8,845	1,560	1,450	855	75	3,940
<b>Cost Burden (and none of the above)</b>	1,210	2,890	2,165	405	6,670	435	1,190	2,195	1,095	4,915
<b>Zero income (and none of the above)</b>	630	0	0	0	630	220	0	0	0	220

Note: Each housing problem count is exclusive of other housing problems and is listed in sequential order meaning that the count for each row indicates that those households have none of the problems listed above it, but may also have one of the problems listed below it. For example, a household with substandard conditions may also be cost burdened, but would only be counted in the substandard row.

Source: CHAS 2008-2012

- The largest housing problem for renters and owners is cost burden and severe cost burden – accounting for 85 percent of housing problems for renters and 92 percent of housing problems for owners.
- As incomes increase, the rate of severe cost burden decreases significantly, while the rate of cost burden increases or stabilizes, suggesting that there is not an adequate supply of housing affordable to low- and moderate-income households.

## Wyoming

**Table 3.5: Households with a Housing Problem (Wyoming)**

Housing Problem	Renter Households					Owner Households				
	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total
<b>Substandard</b>	0	50	125	15	190	0	15	15	0	30
<b>Severely Overcrowded (and none of the above)</b>	0	25	15	0	40	0	4	0	10	14
<b>Overcrowded (and none of the above)</b>	130	120	50	0	300	15	40	55	25	135
<b>Severe Cost Burden (and none of the above)</b>	1,345	465	15	0	1,825	745	685	310	65	1,805
<b>Cost Burden (and none of the above)</b>	125	820	690	0	1,635	205	560	1,150	560	2,475
<b>Zero income (and none of the above)</b>	165	0	0	0	165	110	0	0	0	110

Note: Each housing problem count is exclusive of other housing problems and is listed in sequential order meaning that the count for each row indicates that those households have none of the problems listed above it, but may also have one of the problems listed below it. For example, a household with substandard conditions may also be cost burdened, but would only be counted in the substandard row.

Source: CHAS 2008-2012

- The largest housing problem for both renter and owner households in Wyoming is cost burden and severe cost burden.
- Similar to Grand Rapids and Kent County, the number of severe cost burdened households decreases as income levels increase and the share of cost burden increases as income levels increase.
- The greatest share of severe cost burdened households (renters and owners) are at 0-30 percent AMI while the greatest share of cost burden for owners is for households at 50-80 percent AMI.

## Balance of Kent County

**Table 3.6: Households with a Housing Problem (Balance of Kent County)**

Housing Problem	Renter Households					Owner Households				
	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total
<b>Substandard</b>	270	130	215	15	630	95	85	120	10	310
<b>Severely Overcrowded (and none of the above)</b>	15	0	0	0	15	5	26	15	11	57
<b>Overcrowded (and none of the above)</b>	185	140	90	0	415	40	25	145	70	280
<b>Severe Cost Burden (and none of the above)</b>	3,465	1,330	285	30	5,110	2,720	2,290	2,065	495	7,570
<b>Cost Burden (and none of the above)</b>	440	2,475	1,545	205	4,665	645	2,400	3,755	2,810	9,610
<b>Zero income (and none of the above)</b>	165	0	0	0	165	110	0	0	0	110

Note: Each housing problem count is exclusive of other housing problems and is listed in sequential order meaning that the count for each row indicates that those households have none of the problems listed above it, but may also have one of the problems listed below it. For example, a household with substandard conditions may also be cost burdened, but would only be counted in the substandard row.

Source: CHAS 2008-2012

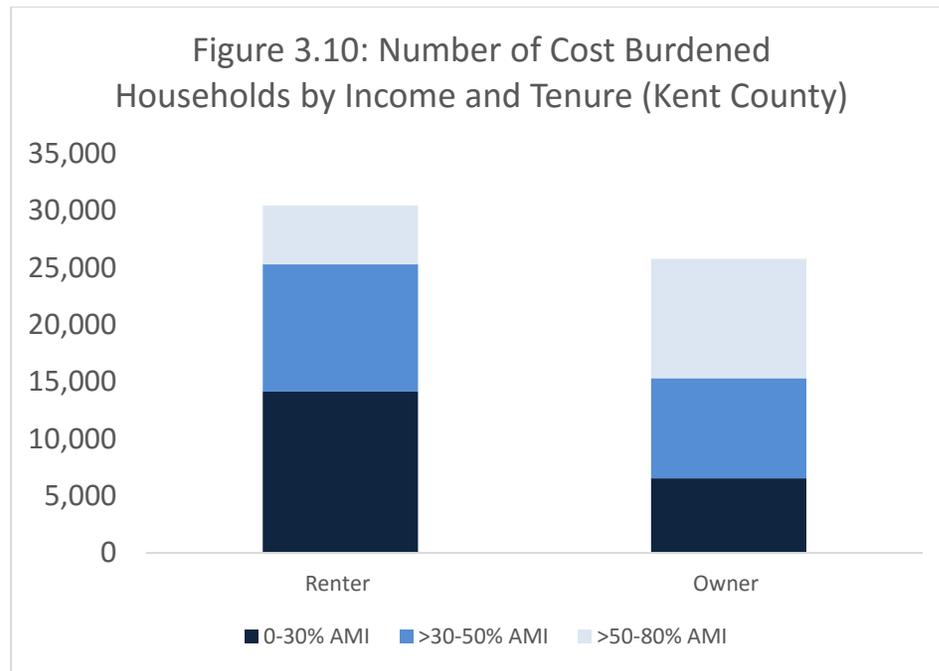
- A very low share of households in the balance of Kent County are overcrowded when compared to the County as a whole.
- Similar to Grand Rapids and Wyoming, the greatest housing problem for both renters and owners is cost burden and severe cost burden.
- More homeowners in the balance of Kent County are cost burdened, indicating that homebuyers may overextend their budgets to purchase homes in this area.

### **Cost Burdened Households**

Given the high rate of cost burden and severe cost burden in Kent County, the following figures provide greater detail on the share of households experiencing cost burden by income level and housing tenure for each jurisdiction.

In Kent County, just over 30,000 renter households are cost burdened, nearly half of which have incomes between 0-30 percent AMI. The large share of extremely low-income households indicates there is not enough affordable housing stock for extremely low-income households in the county to meet demand. There are fewer cost burdened owner households in the county (approximately 25,000), but the larger share of 50-80 percent AMI households experiencing cost burden indicates there may not be adequate affordable homeownership opportunities in the county.

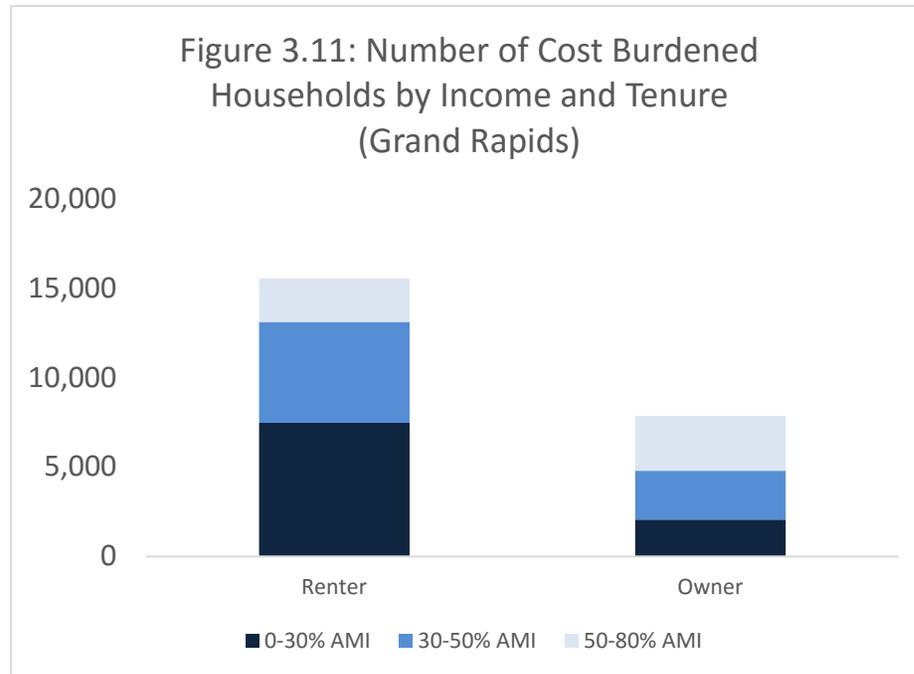
### **Kent County**



Source: 2008-2012 CHAS

### Grand Rapids

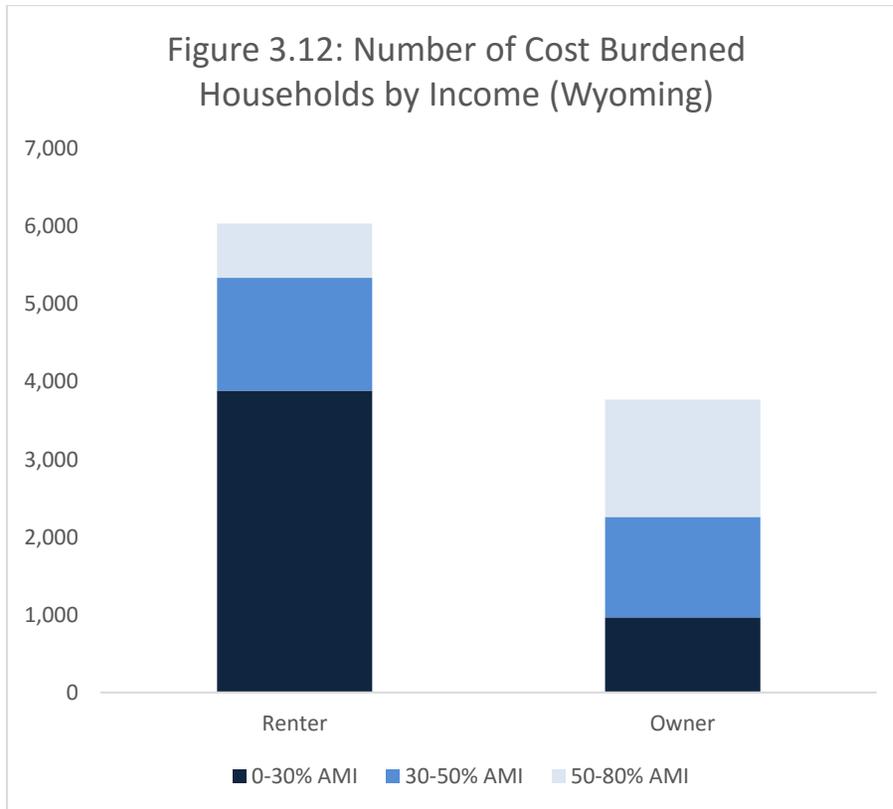
Grand Rapids accounts for close to half of the cost burdened renter households in the county. Given the increase in housing costs in Grand Rapids over the past several years, the share of cost burdened renter and owner households is likely much greater than the count (23,400) indicated in the figure below.



Source: CHAS 2008-2012

### Wyoming

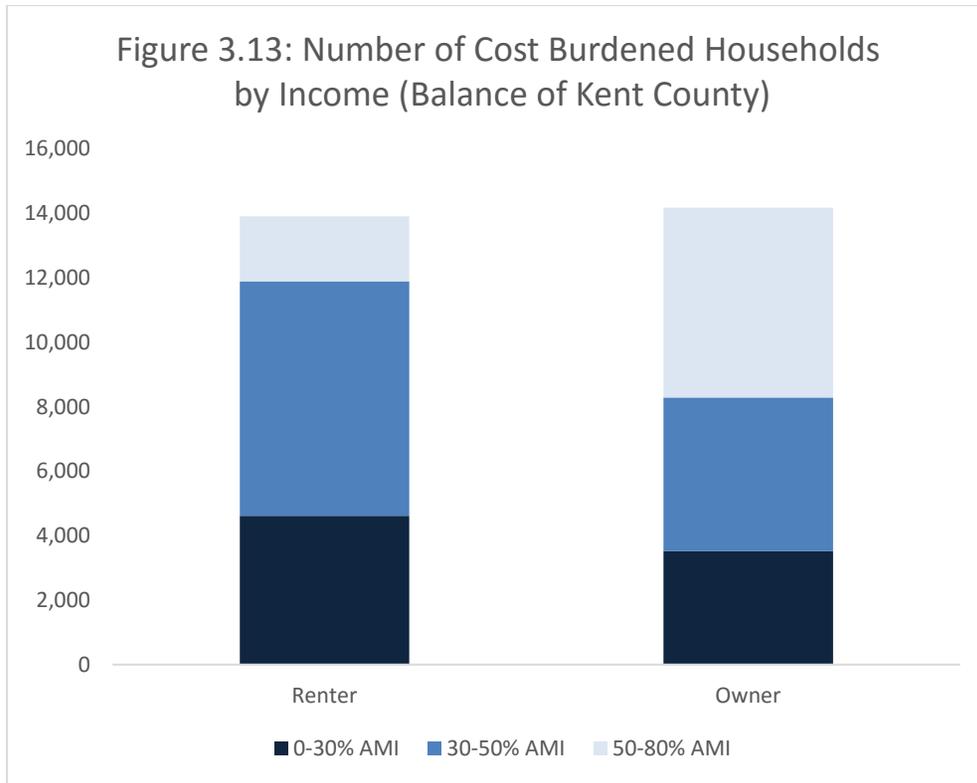
Nearly two thirds of cost burdened renter households are extremely low-income households, indicating a lack of affordable, rental housing for households earning between 0-30 percent AMI.



Source: 2008-2012 CHAS

***Balance of Kent County***

Unlike in Grand Rapids and Wyoming, where there is a significantly greater number of cost burdened renters than owners, owner households are more likely to be cost burdened than renter households in the balance of Kent County. This is, in part, due to the much higher homeownership rate in the balance of Kent County when compared to Grand Rapids and Wyoming. As noted earlier, the large share of cost burdened owner households indicates that households may be overextending themselves when purchasing homes outside of Grand Rapids and Wyoming.



Source: CHAS 2008-2012

**Cost Burden > 50%**

The following tables further analyze severe housing cost burden in Kent County by tenure, income level and household type. The analyzed household types are:

- Small Family (2-4 people)
- Large Family (≥ 5 people)
- Elderly (at least one person over the age of 62)
- Other (single person and unrelated households)

**Kent County**

In Kent County, the largest share of severely cost burdened households are extremely low- income renters (predominately small family and other households). There is a large share of small family and elderly owner households that are severely cost burdened, indicating the potential need for owner-occupied rehab programs for elderly and home ownership assistance for other households in the County. The majority of severely cost burdened households throughout the County are extremely low- and very low-income households. Households earning more than 50 percent AMI have a much lower rate of severe cost burden.

**Table 3.7: Severe Cost Burden by Income Level (Kent County)**

Income Level	Renter Households				Owner Households			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>Small Family</b>	4,535	1,605	60	6,200	2,005	1,610	1,225	5,310
<b>Large Family</b>	1,310	365	25	1,700	310	595	295	1,375
<b>Elderly</b>	960	865	375	2,200	1,595	1,470	760	5,155
<b>Other</b>	5,270	1,570	105	6,945	1,255	815	960	2,335

Source: CHAS 2008-2012

**Grand Rapids**

In Grand Rapids, the largest share of cost burdened renters are Other Households. This likely includes younger, unrelated households who either choose to live in more expensive housing for proximity to the downtown area or are unable to find affordable housing because of rising rental housing costs in the City.

**Table 3.8: Severe Cost Burden by Income Level (Grand Rapids)**

Income Level	Renter Households				Owner Households			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Family	2,495	815	10	3,320	545	545	185	1,275
Large Family	785	290	0	1,075	135	225	15	375
Elderly	455	480	140	1,075	465	320	185	970
Other	3,075	880	65	4,020	435	400	470	1,305

Source: CHAS 2008-2012

**Wyoming**

The largest absolute share of severely cost burdened households in Wyoming is small family owner and renter households. As discussed earlier, small family households is the largest household type in the City. A small number of moderate-income renter households are severely cost burdened, suggesting that there are adequate, affordable rental options for moderate-income renter households.

**Table 3.9: Severe Cost Burden by Income Level (Wyoming)**

Income Level	Renter Households				Owner Households			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Family	520	135	10	665	275	300	145	720
Large Family	270	45	0	315	60	65	40	165
Elderly	180	79	20	279	240	180	45	465
Other	505	240	4	749	185	145	85	415

Source: CHAS 2008-2012

## Balance of Kent County

The majority of severely cost burdened renter households in the balance of Kent County are extremely low-income households. However, the share of low- and moderate-income households that are severely cost burdened is similar, indicating that there is a limited supply of affordable housing for any household earning less than 80 percent AMI in the balance of the county.

**Table 3.10: Severe Cost Burden by Income Level (Balance of Kent County)**

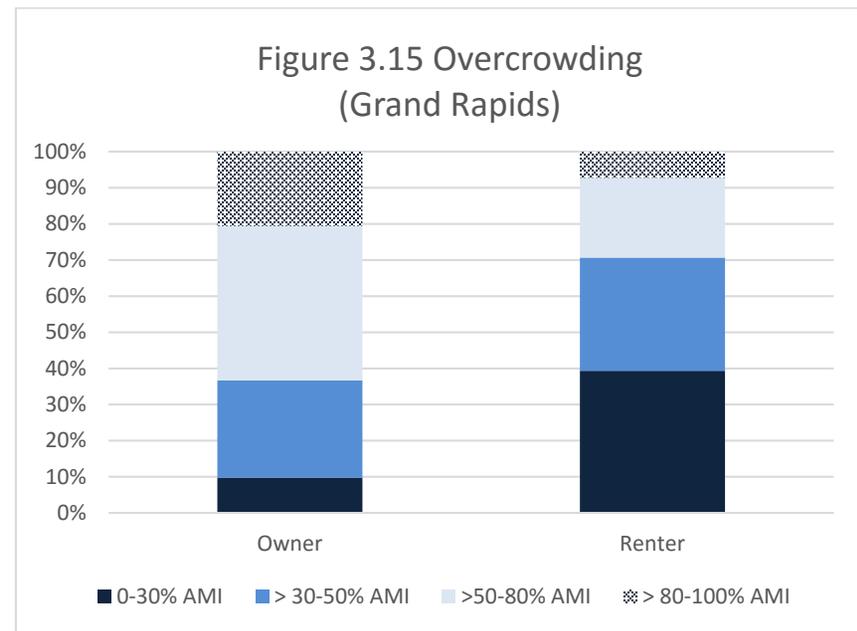
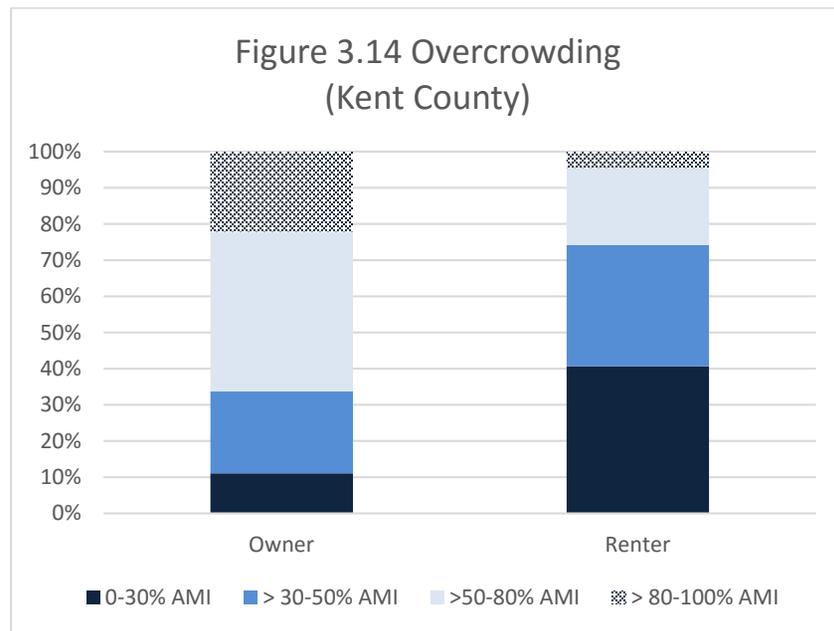
Income Level	Renter Households				Owner Households			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Family	1,520	655	40	2,215	1185	765	895	2,845
Large Family	255	30	25	310	115	305	240	660
Elderly	325	306	215	846	890	970	530	2,390
Other	1,690	450	36	2,176	635	270	405	1,310

Source: CHAS 2008-2012

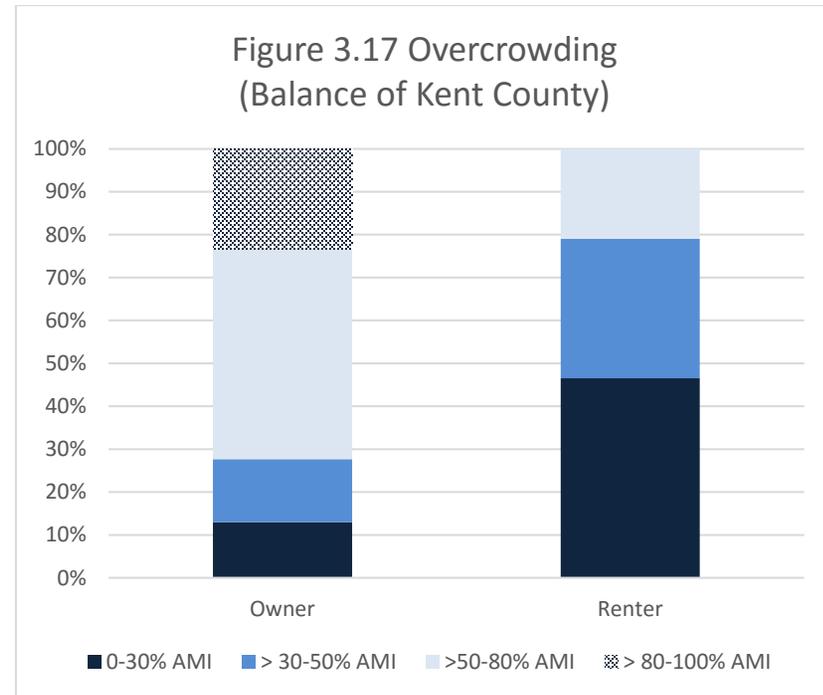
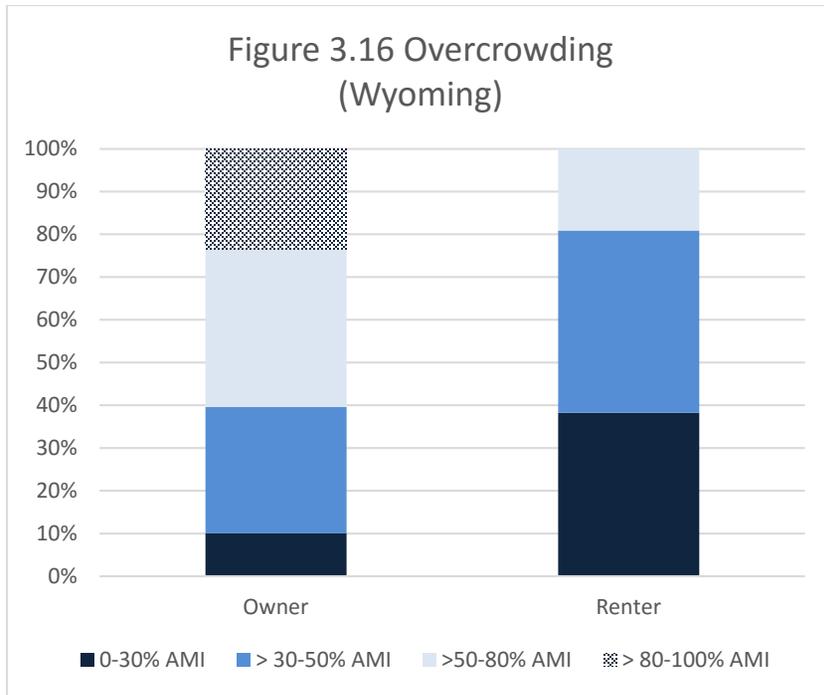
**Overcrowding (More than one person per room)**

Compared to cost burdened households, the share of overcrowded and severely overcrowded renter and owner households is low in Kent County. This low rate of overcrowding suggests that the majority of housing units are adequately sized for the population.

More than 50% of the County’s overcrowded rental units are located in Grand Rapids, the majority of which (70 percent) are occupied by extremely low- and low-income households. This indicates the lowest income households may not be able to afford adequately sized housing units.



Source: 2008-2012 CHAS



Source: 2008-2012 CHAS

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

There are an estimated 59,530 single person households (householder living alone) in Kent County (23,328 in Grand Rapids and 7,281 in Wyoming) and 74,472 non-family households in Kent County. Single person households account for 26 percent of all Kent County households and 80 percent of Kent County non-family households.

Applying this share (80 percent in Kent County) to the “Other” category, the category for non-family households, in the cost burdened tables, the number of single person households most in need of housing assistance are extremely low-, low-, and moderate-income renter households.

This method of estimation indicates that more than 13,300 single-person households in the County are cost-burdened and may require some level of housing assistance. This problem is most prevalent for extremely low-income households. This problem is most prevalent for extremely low-income households.

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**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.**

**Disability**

**Kent County**

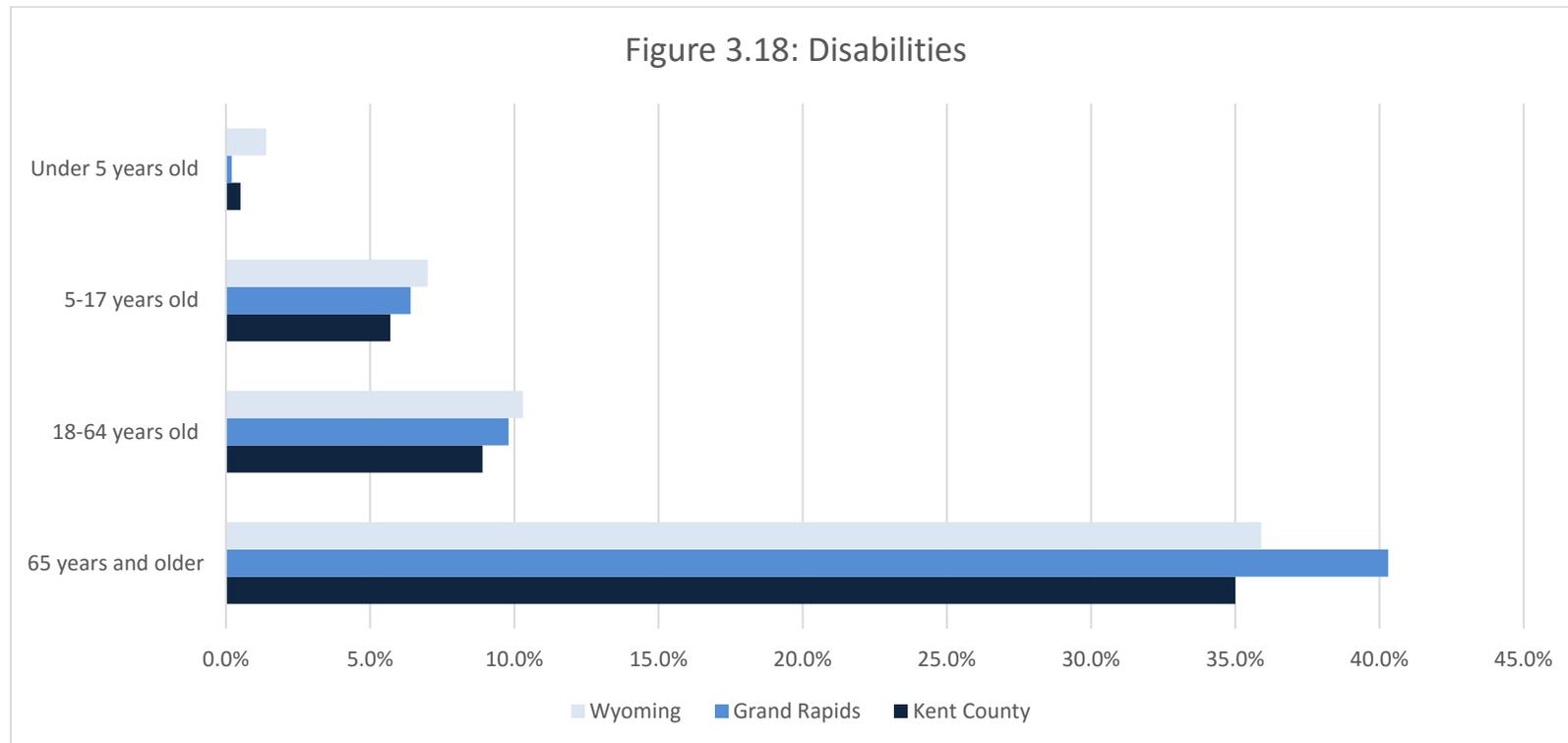
- The ACS estimates 63,068 individuals are living with a disability, accounting for 10.5 percent of the total population:
  - Population under 5 years old with a disability – 227 individuals (0.5 percent of the population within this age range)
  - Population 5 to 17 years old with a disability – 6,511 individuals (6 percent of the population within in this age range)
  - Population 18 to 64 years old with a disability –33,546 individuals (9 percent of the population within this age range)
  - Population 65 years old and over with a disability – 22,784 (35 percent of the population within this age range)

**Grand Rapids**

- The ACS estimates 21,627 individuals are living with a disability, accounting for 11.6 percent of the total population:
  - Population under 5 years old with a disability – 31 individuals (0.2 percent of the population within this age range)
  - Population 5 to 17 years old with a disability – 2,073 individuals (6 percent of the population within in this age range)
  - Population 18 to 64 years old with a disability – 11,731 individuals (10 percent of the population within this age range)
  - Population 65 years old and over with a disability – 7,792 (40 percent of the population within this age range)

## Wyoming

- The ACS estimates 8,153 individuals are living with a disability, accounting for 11.3 percent of the total population:
  - Population under 5 years old with a disability – 85 individuals (1 percent of the population within this age range)
  - Population 5 to 17 years old with a disability – 923 individuals (7 percent of the population within in this age range)
  - Population 18 to 64 years old with a disability – 4,816 individuals (10 percent of the population within this age range)
  - Population 65 years old and over with a disability – 2,329 individuals (36 percent of the population within this age range)



Source: ACS 2008-2012

## **Domestic Violence**

While there is limited data regarding sex crimes incidents and victims of domestic violence, according to the Michigan Incident Crime Report (MICR), in Kent County during 2014 (the most recent report which includes data checks into March of 2015) there were 859 incidents of sex crimes that were reported to law enforcement (these include penetration and non-penetration offenses). Considering that in 2012 the Bureau of Justice Statistics estimated that 65% of sex crimes go unreported to police, the actual number of sexual assaults is likely much higher – potentially over 2,400 annually. In addition, the 2014 MIRC reported 2,269 victims of domestic violence in Kent County. In this instance, domestic violence could be characterized as intimate partner violence such as assault by spouse, boy or girl friend, former partner, etc. According to the U.S. Department of Justice, approximately 60% of intimate partner violence assaults are reported, which means that the actual number is likely closer to 3,700 annually.

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### **What are the most common housing problems? Are any populations/household types more affected than others by these problems?**

- Owner households in Kent County and Wyoming are most affected by housing problems, while renters in Grand Rapids and Kent County (excluding Grand Rapids and Wyoming) are more affected by housing problems than owners.
- Extremely low- and low-income renters and very low- and low-income owner households are the most affected by housing problems.
- A significant number of moderate income owners are severely cost burdened, especially in the balance of Kent County, suggesting that some owners have over-extended themselves in housing costs.
- Cost burden is by far the most common housing problem in all jurisdictions for both owners and renters.

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### **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**

- According to the ACS, 16 percent of individuals and 11 percent of families live below the poverty level in Kent County, 27 percent of individuals and 20 percent of families live below the poverty level in Grand Rapids, and 17 percent of individuals and 13 percent

of families live below the poverty level in Wyoming. The percent of families with children less than 18 years of age living in poverty is 19 percent in Kent County, 33 percent in Grand Rapids and 20 percent in Wyoming.

- According to the National Low Income Housing Coalition “Out of Reach 2015” report, the annual income needed to afford a 2 bedroom apartment in the Kent County is \$29,480 and the Fair Market Rent for a 2 Bedroom apartment is \$737.
- Few families experiencing a housing crisis have sufficient income to afford Fair Market Rent. Specific housing characteristics that have been linked to homelessness are high housing costs, poor quality housing, unstable neighborhoods and overcrowding. As indicated in the tables above, extremely low- and low-income households are more likely to experience these housing characteristics.

---

**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:**

- The households most susceptible to becoming homeless are households with income less than 30 percent of the AMI that are severely cost-burdened (paying more than 50 percent of their income for rent).
- Other populations disproportionately at risk of becoming homeless are victims of domestic violence, substance abuse, those with severe mental health problems and people exiting incarceration.

---

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

- In addition to the at-risk characteristic indicated above, the characteristics most commonly linked with housing instability and an increased risk of homelessness include high cost burden, lack of jobs, high unemployment rate, personal circumstances and the tight rental market.
- Severe cost burden (where more than 50 percent of income goes towards housing costs) is the greatest predictor of homelessness risk, especially for persons having incomes at or below 50 percent AMI.

## DISPROPORTIONATELY GREATER NEED: HOUSING PROBLEMS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

---

### Introduction

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten percentage points above the need demonstrated for the total households within the jurisdiction at a particular income level. The tables below indicate the share of households by race/ethnicity and income level experiencing one or more of the four housing problems. The four housing problems are: 1) Housing unit lacks complete kitchen facilities; 2) Housing unit lacks complete plumbing facilities; 3) More than one person per room (overcrowded); and 4) Household is cost burdened (between 30 and 50 percent of income is devoted to housing costs).

Disproportionate need for each race/ethnicity is determined by calculating the share of the total number of households with one or more housing problems from each race/ethnicity and comparing that figure to the share of all Kent County households at that income level that experience the problem. (Share of Race/Ethnicity = “# of households for that race/ethnicity with one or more housing problem / total # of households for that race/ethnicity.”)

According to the 2010 Decennial Census, only 0.5 percent of the total population in Kent County is American Indian and Alaska Natives and less than 1/10<sup>th</sup> of one percent is Pacific Islanders. Given the low share of these populations, the estimates from the American Community Survey and Comprehensive Housing Affordability Strategy datasets for specific income levels present skewed data with relatively large margins of error. As such, these populations are not included as independent categories in the analysis and are included in the “Other” category. The “Other” category also includes households with two or more races and households that identify with another race.

### 0%-30% of AMI

**Table 3.11: 0%-30% of AMI**

Race/Ethnicity	Housing Problems*	No Housing Problems	Zero Income	Share
<b>All</b>	20,825	2,745	1,800	82%
<b>White, Non-Hispanic</b>	11,690	1,715	1,105	81%
<b>African-American, Non-Hispanic</b>	5,455	585	480	84%
<b>Asian, Non-Hispanic</b>	225	60	30	71%
<b>Hispanic</b>	2,760	295	130	87%
<b>Other</b>	695	90	45	84%

Source: 2008-2012 CHAS Data

More than four out of five Kent County households (82 percent) in the 0-30 percent AMI bracket experience at least one housing problem.

Nearly 21,000 households with incomes between 0 and 30 percent of AMI experience a housing problem. The shares for each race/ethnicity are not greater than ten percentage points of the total share and therefore do not represent a disproportionate greater need at this income level.

### 30%-50% of AMI

**Table 3.12: 30%-50% of AMI**

Race/Ethnicity	Housing Problems*	No Housing Problems	Zero Income	Share
<b>All</b>	20,330	6,740	0	75%
<b>White, Non-Hispanic</b>	13,835	5,355	0	72%
<b>African-American, Non-Hispanic</b>	3,175	640	0	83%
<b>Asian, Non-Hispanic</b>	385	125	0	75%
<b>Hispanic</b>	2,330	520	0	82%
<b>Other</b>	610	105	0	85%

Source: 2008-2012 CHAS Data

The share of households in Kent County at 30-50 percent AMI experiencing at least one housing problem is 75 percent.

The shares for Other households is 10 percentage points higher than the incidence for households of any race and therefore represents a potential disproportionate greater need at this income for Other households. The shares for the other races/ethnicities are not greater than ten percentage points and do not represent a disproportionate greater need at this income level.

**50%-80% of AMI**

**Table 3.13: 50%-80% of AMI**

Race/Ethnicity	Housing Problems*	No Housing Problems	Zero Income	Share
<b>All</b>	16,830	21,480	0	44%
<b>White, Non-Hispanic</b>	12,590	17,535	0	42%
<b>African-American, Non-Hispanic</b>	2,195	1700	0	56%
<b>Asian, Non-Hispanic</b>	225	420	0	35%
<b>Hispanic</b>	1,590	1,615	0	50%
<b>Other</b>	225	210	0	52%

Source: 2008-2012 CHAS Data

**80%-100% of AMI**

**Table 3.14: 80% - 100% of AMI**

Race/Ethnicity	Housing Problems*	No Housing Problems	Zero Income	Share
<b>All</b>	6,215	18,070	0	26%
<b>White, Non-Hispanic</b>	5,370	14,895	0	26%
<b>African-American, Non-Hispanic</b>	310	1,115	0	22%
<b>Asian, Non-Hispanic</b>	70	455	0	13%
<b>Hispanic</b>	390	1345	0	22%
<b>Other</b>	70	255	0	22%

Source: 2008-2012 CHAS Data

The share of households in Kent County at 50-80 percent AMI experiencing at least one housing problem is 44 percent.

The share for African-American households is 12 percentage points higher than the incidence for all households and therefore represents a potential disproportionate greater need at this income for African-American households. The shares for the other races/ethnicities are not greater than ten percentage points and do not represent a disproportionate greater need at this income level.

The share of total households at 80-100 percent AMI experiencing at least one housing problem is 26 percent.

The share for each race/ethnicity is not greater than ten percentage points and therefore do not represent a disproportionate greater need at this income level.

---

## Summary

The following groups have disproportionately greater needs:

1. The share for Other Households in the 30-50 percent AMI range is 10 percentage points higher than the incidence for households of any race and therefore represents a potential disproportionate need at this income level. The absolute of Other Households experiencing housing problems compared to the total number of households at this income level is approximately 3 percent (60 households).
2. The share for African American households in the 50-80 percent AMI range is 12 percentage points higher than the incidence for all households and indicates a potential disproportionate need at this income level. More than 2,000 (or approximately 13 percent) of the households experiencing housing problems at the 50-80 percent range are African-American households.

The jurisdictions recognize these disproportionate needs and will collaborate with housing and service providers to monitor the needs of low- and moderate-income households.

## DISPROPORTIONATELY GREATER NEED: SEVERE HOUSING PROBLEMS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

---

### Introduction

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten percentage points above the need demonstrated for the total households within the jurisdiction at a particular income level. The tables below indicate the share of households by race/ethnicity and income level experiencing one or more of the four severe housing problems. The four housing problems are: 1) Housing unit lacks complete kitchen facilities; 2) Housing unit lacks complete plumbing facilities; 3) More than 1.5 person per room (overcrowded); and 4) Household is severely cost burdened ( greater than 50 percent of income is devoted to housing costs).

Disproportionate need for each race/ethnicity is determined by calculating the share of the total number of households with one or more severe housing problems from each race/ethnicity and comparing that figure to the share of all Kent County households at that income level that experience the problem. (Share of Race/Ethnicity = “# of households for that race/ethnicity with one or more severe housing problem / total # of households for that race/ethnicity.”)

According to the 2010 Decennial Census, only 0.5 percent of the total population in Kent County is American Indian and Alaska Natives and less than 1/10<sup>th</sup> of one percent is Pacific Islanders. Given the low share of these populations, the estimates from the American Community Survey and Comprehensive Housing Affordability Strategy datasets for specific income levels present skewed data with relatively large margins of error. As such, these populations are not included as independent categories in the analysis and are included in the “Other” category. The “Other” category also includes households with two or more races and households that identify with another race.

### 0%-30% of AMI

**Table 3.15: 0%-30% of AMI**

Race/Ethnicity	Housing Problems*	No Housing Problems	Zero Income	Share
<b>All</b>	17,770	5,805	1,800	70%
<b>White, Non-Hispanic</b>	9,975	3,425	1,105	69%
<b>African-American, Non-Hispanic</b>	4,660	1,385	480	71%
<b>Asian, Non-Hispanic</b>	195	90	30	62%
<b>Hispanic</b>	2,310	745	130	73%
<b>Other</b>	625	160	45	75%

Source: 2008-2012 CHAS Data

The share of total households in Kent County at 0-30 percent AMI experiencing at least one severe housing problem is 70 percent. More than 17,000 households in the region experience at least one severe housing problem at this income level.

The data indicate that any share of a race/ethnicity category in Kent County is not greater than ten percentage points above the total need and therefore the shares do not show a disproportionate greater need at this income level.

### 30%-50% of AMI

**Table 3.16: 30%-50% of AMI**

Race/Ethnicity	Housing Problems*	No Housing Problems	Zero Income	Share
<b>All</b>	9,995	17,075	0	37%
<b>White, Non-Hispanic</b>	6,505	12,680	0	34%
<b>African-American, Non-Hispanic</b>	1,710	2,095	0	45%
<b>Asian, Non-Hispanic</b>	190	315	0	38%
<b>Hispanic</b>	1,275	1,575	0	45%
<b>Other</b>	315	400	0	44%

Source: 2008-2012 CHAS Data

The share of total Kent County households at 30-50 percent AMI experiencing at least one severe housing problem is 37 percent. Nearly 10,000 households have at least one severe housing problem at this income level.

None of the races/ethnicities represent a disproportionate greater need when compared to Kent County as a whole for the 30-50 percent AMI level.

### 50%-80% of AMI

**Table 3.17: 50-80% of AMI**

Race/Ethnicity	Housing Problems*	No Housing Problems	Zero Income	Share
<b>All</b>	5,330	32,980	0	14%
<b>White, Non-Hispanic</b>	4,135	25,985	0	14%
<b>African-American, Non-Hispanic</b>	605	3,290	0	16%
<b>Asian, Non-Hispanic</b>	80	560	0	13%
<b>Hispanic</b>	440	2,765	0	14%
<b>Other</b>	55	380	0	13%

Source: 2008-2012 CHAS Data

The share of total households in Kent County at 50-80 percent AMI experiencing at least one severe housing problem is 14 percent. Just over 5,000 households at this income level experience at least one severe housing problem.

The data indicate that any share of a race/ethnicity category in Kent County is not greater than ten percentage points above the total need and therefore the shares do not show a disproportionate greater need at this income level.

### 80%-100% of AMI

**Table 3.18: 80%-100% of AMI**

Race/Ethnicity	Housing Problems*	No Housing Problems	Zero Income	Share
<b>All</b>	1,135	23,145	0	5%
<b>White, Non-Hispanic</b>	885	19,380	0	4%
<b>African-American, Non-Hispanic</b>	60	1,370	0	4%
<b>Asian, Non-Hispanic</b>	40	485	0	8%
<b>Hispanic</b>	155	1,585	0	9%
<b>Other</b>	0	330	0	0%

Source: 2008-2012 CHAS Data

The share of total households in Kent County at 80-100 percent AMI experiencing at least one severe housing problem is 5 percent (1,135 households).

None of the races/ethnicities represent a disproportionate greater need when compared to the region as a whole for the 80-100 percent AMI level.

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**Summary**

No races/ethnicities are experiencing a severe housing problem as a disproportionate need at any of the examined income levels.

## DISPROPORTIONATELY GREATER NEED: HOUSING COST BURDENS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

---

### Introduction:

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten percentage points above the need demonstrated for the total households within the jurisdiction at a particular income level. The table below indicates the share of households by race/ethnicity experiencing cost burden (paying between 30-50 percent of household income for housing costs) and severe cost burden (paying more than 50 percent of household income for housing costs).

Disproportionate need for each race/ethnicity is determined by calculating the share of the total number of cost burdened and severely cost burdened households from each race/ethnicity and comparing that figure to the share of all Kent County households. (Share of Race/Ethnicity = “# of households for that race/ethnicity with cost burden / total # of households for that race/ethnicity.”)

According to the 2010 Decennial Census, only 0.5 percent of the total population in Kent County is American Indian and Alaska Natives and less than 1/10<sup>th</sup> of one percent is Pacific Islanders. Given the low share of these populations, the estimates from the American Community Survey and Comprehensive Housing Affordability Strategy datasets for specific income levels present skewed data with relatively large margins of error. As such, these populations are not included as independent categories in the analysis and are included in the “Other” category. The “Other” category also includes households with two or more races and households that identify with another race.

**Table 3.19: Housing Cost Burden Disproportionately Greater Need (Kent County)**

Race/Ethnicity	Share of Income to Housing Costs			
	< than 30%	30-50%	> than 50%	No Income
<b>All</b>	155,635	39,330	31,410	1,830
<b>White, Non-Hispanic</b>	134,515	29,515	20,590	1,130
<b>African-American, Non-Hispanic</b>	8,800	4,855	6,430	480
<b>Asian, Non-Hispanic</b>	2,660	640	385	30
<b>Hispanic</b>	7,860	3,600	3,035	145
<b>Other</b>	1,800	720	970	45

Source: 2008-2012 CHAS Data

For Kent County, 31 percent of households are considered to have a cost burden because they pay more than 30 percent of income for housing. Specifically, 17 percent of total households are cost burdened (30-50 percent income spent on housing costs), and 14 percent of total households are severely cost burdened (more than 50 percent of income spent on housing costs). The share for each race/ethnicity follows:

**Table 3.20: Cost Burdened by Race/Ethnicity**

Any Cost Burden (> 30%)	Cost Burdened (30-50%)	Severely Cost Burdened (>50%)
<ul style="list-style-type: none"> <li>All: 31%</li> <li>White, Non-Hispanic: 27%</li> <li><b>Black/African American: 55%</b></li> <li>Asian: 28%</li> <li><b>Hispanic: 45%</b></li> <li><b>Other: 48%</b></li> </ul>	<ul style="list-style-type: none"> <li>All: 17%</li> <li>White, Non-Hispanic: 16%</li> <li>Black/African American: 24%</li> <li>Asian: 17%</li> <li>Hispanic: 25%</li> <li>Other: 20%</li> </ul>	<ul style="list-style-type: none"> <li>All: 14%</li> <li>White, Non-Hispanic: 11%</li> <li><b>Black/African American: 31%</b></li> <li>Asian: 10%</li> <li>Hispanic: 21%</li> <li><b>Other: 27%</b></li> </ul>

Source: 2008-2012 CHAS Data

When viewing any level of cost burden (households paying more than 30 percent of income to housing costs), African-American, Hispanic and Other households exhibit a potential disproportionately greater need. Hispanic households do not appear to have a disproportionate need when assessing cost burden or severe cost burden, but do when considering any level of cost burden.

No race/ethnicity exhibits a disproportionately greater need in regards to cost burden (paying between 30-50 percent of income for housing). However, both the African-American and Other households exhibit a potential disproportionate need for severe housing cost burden (paying more than 50 percent pf income for housing):

- 31 percent of African-American households experience severe cost burden (14 percentage points greater than all households), and
- 27 percent of Other households experience severe cost burden (10 percentage points greater than all households).

## 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 problem data revealed that housing problems were experienced by race and ethnic categories within specific income ranges at relatively similarly levels in Kent County. A racial or ethnic group can have a disproportionately greater need and still have significantly fewer households experiencing a housing problem than households in other racial or ethnic groups. The racial and ethnic groups that have disproportionately greater needs than the needs of Kent County's population as a whole in specific income categories include:

### **Housing Problems**

30-50% AMI

- Other

50-80% AMI

- African-American

### **Severe Housing Problems**

None

### **Any Cost Burden**

- African American
- Hispanic
- Other

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**If they have needs not identified above, what are those needs?**

Per the Comprehensive Housing Affordability Strategy (CHAS) estimates used for the development of this Consolidated Plan, the needs for races/ethnicities are indicated above. Income categories have other, more general needs, as described in the Housing Needs Assessment and the Housing Market Analysis.

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

The Housing Needs section above provides an overview of demographic conditions and housing problems in Grand Rapids, Wyoming and the balance of Kent County.

## **PUBLIC HOUSING – 91.205(B)**

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### **Introduction**

The Kent County Housing Commission, Grand Rapids Housing Commission, Rockford Housing Commission and Wyoming Housing Commission all service Kent County.

Together, the four Housing Commissions serve over 5,300 households through traditional public housing developments, a Moderate Rehabilitation program, and project- and tenant-based housing vouchers. The vast majority (87 percent) of clients are served through vouchers, although the commissions collectively operate over 600 units of housing.

The average income of households residing in traditional public housing units is \$11,161. The average income of households utilizing vouchers is \$12,163. Between vouchers and public housing units, the Housing Commissions serve almost 800 elderly residents and over 1,900 disabled families. The following tables represent a profile of the Public Housing residents and voucher holders in Kent County.

Recipients of vouchers from a certain Housing Commission are allowed to move to a rental unit of their choice, including those located outside of the jurisdiction of the issuing Commission as long as there is a Commission operating a voucher program in the jurisdiction where the voucher is located. Consequently, recipients of vouchers in Kent County have more flexibility in finding rental units that meet their needs.

**Table 3.21: Totals in Use**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
<b># of units/vouchers in use</b>	0	97	614	4,624	405	3,891	34	164	92

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Source: PIC (PIH Information Center) for the four housing commissions

**Table 3.22: Characteristics of Residents**

Characteristics	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
<b># Homeless at admission</b>	0	8	0	75	2	57	4	12
<b># of Elderly Program Participants (&gt;62)</b>	0	9	113	667	210	430	2	2
<b># of Disabled Families</b>	0	73	286	1,619	193	1,298	9	34
<b># of Families requesting accessibility features</b>	0	97	614	4,624	405	3,891	34	164
<b># of HIV/AIDS program participants</b>	0	0	0	0	0	0	0	0
<b># of DV victims</b>	0	0	0	0	0	0	0	0

Source: PIC (PIH Information Center) for the four housing commissions

**Table 3.23: Race of Residents**

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	68	284	1,682	249	1,291	15	84	33
Black/African American	0	28	326	2,888	150	2,556	19	77	58
Asian	0	0	2	15	2	11	0	1	1
American Indian/Alaska Native	0	1	1	38	4	32	0	2	0
Pacific Islander	0	0	1	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition  
 Source: PIC (PIH Information Center) for the four housing commissions

**Table 3.24: Ethnicity of Residents**

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	5	72	337	19	282	2	25	6
Not Hispanic	0	92	542	4,287	386	3,609	32	139	86

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition  
 Source: PIC (PIH Information Center) for the four housing commissions

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

The Housing Commissions play a significant role in providing units accessible to persons with disabilities. They currently serve 1,978 households in which at least one person has a disability. More so, over 5,300 households have requested some form of accessibility features. For new construction and substantial rehab projects, the Housing Commissions meet the Section 504 standards.

Applicants who require accessible units are given a priority for placement in those units. Reported Section 504 needs include:

- Kent County reports a general lack of affordable units as a result of more households seeking assistance.
- Wyoming reports that its need for accessible units varies; the Wyoming Housing Commission reports that 5-20 percent of tenants and applicants may need accessible accommodations
- Rockford housing Commission reports that its public housing building is partially barrier-free, with units that include features such as walk-in showers and extra-wide doorways. However, the majority of requests are for grab bars in bathrooms and assistance animals.
- As a result of the Section 504 Needs Assessment, the Grand Rapids Housing Commission has modified existing structures (both common areas and dwelling units) to accommodate persons with disabilities and dedicates as much as 10 percent of its new construction to barrier-free units. Policies, applications, forms and services have also been modified to make reasonable accommodations.

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### **Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

The dominant issue faced by public housing residents and holders of Housing Choice Vouchers (HCVs) is the increasing difficulty of voucher holders to find a suitable unit with good access to employment and services. Although median rents throughout the county have risen by about 20 percent since 2012, HUD fair market rents (FMRs) have remained between \$730 and \$750/month for a 2-bedroom unit since 2010 and are currently at \$737. These rents effectively determine the upper limits that can be charged by property owners for units rented to the holder of an HCV. As noted elsewhere, rents available in the countywide market have increased very rapidly, and the gap between HUD FMRs and market rents is growing. This has created problems for low-income households seeking units that will accept a HUD-subsidized voucher for rent assistance because property owners are able to get higher rents in the open market and do not have an incentive to rent to those with rent assistance. While the HUD-proposed FMR for 2016 increases to \$767 for a 2-bedroom unit, this 4 percent increase may not be enough to motivate property owners and managers to expand acceptance of rental assistance vouchers and ease the scarcity of participating units. Kent County Housing

Commission expects to exercise its option to fund vouchers at 110 percent of the FMR to increase availability, but this will limit the number of households that can be served. Other needs cited by focus group participants include:

- Grand Rapids Housing Commission: Utility assistance, educational programs to assist families seeking information about rental housing and tenant advocacy, and economic self-sufficiency programs (three area housing commissions provide economic self-sufficiency programs)
- Kent County Housing Commission: Access to available, affordable and adequate units that meet HUD Housing Quality Standards
- Rockford Housing Commission reports a need for family units (such as units with 3 or more bedrooms).
- Wyoming Housing Commission cites a need for better access to transportation, employment resources, and technology accessibility.
- Participants in the PHA focus group generally noted that the limited supply of units available at the fair market rent restricts housing choices for families to particular locations, notably areas of poverty/minority concentration.

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

The needs listed above are similar to the needs of the general Kent County population.

## HOMELESS NEEDS ASSESSMENT – 91.205(c)

### Introduction:

The Grand Rapids Area Coalition to End Homelessness (Coalition) is a community collaborative that is actively working on systems change in the area of homelessness. The goal of the Coalition is to prevent and end systematic homelessness in the greater Grand Rapids area, guided by the values and philosophy set forth in the original 10-year community development plan, the *Vision to End Homelessness*. The *Vision* focuses on preventing homelessness, rapidly re-housing people in a housing crisis, and transforming the system so more people can obtain and maintain housing.

Since the mid-1990s, the U.S. Department of Housing and Urban Development has required communities to have a Housing Continuum of Care (CoC) to conduct planning activities for homeless shelters and services and to allocate funds at the local level. This planning model encourages community collaboration and a focused, structured approach to identify existing needs and resources, and to examine service gaps and funding priorities for homeless shelters and services. The Coalition is the designated Continuum of Care planning group for Grand Rapids, Wyoming, and Kent County. The Coalition acts as the Housing Subcommittee of the Essential Needs Task Force (ENTF), a broader ongoing community effort for nearly 35 years to ensure needs of housing, transportation, utilities, food/nutrition, and economic/workforce development are addressed across Kent County. While the Coalition is its own entity, it is not an independent 501(c) 3 nonprofit organization. The Heart of Michigan United Way is the employer of record for Coalition and ENTF staff.

The following describes the roles of key groups within the Coalition:

- **Steering Committee.** The Coalition Steering Committee provides guidance on overall policy issues, approves funding recommendations, sets the direction of work across the system, and ensures forward movement of strategic plan.
- **Coalition Coordinator and Staff.** The Coalition Coordinator and staff provide support and follow through on the work of the Steering and other subcommittees, assist with facilitating committees and action teams, support the funding review and allocation process for Emergency Solutions Grants and Supportive Housing Programs, coordinate committee work and objectives, provide training and capacity building opportunities for partners, and facilitate local planning activities.

- General Membership and Core Partners Group. The Coalition general membership includes more than 60 core partner organizations and more than 250 stakeholders in the system change process. The Core Partner Group is comprised of 60 agencies and individuals that deliver homeless services or are closely linked with the homeless and housing crisis system. These include nonprofit, government, private, and public organizations as well as homeless or formerly homeless individuals and housing providers across the continuum of need.
- Coalition Committees. In addition to the Steering Committee, the Coalition facilitates a number of Committees, including an executive committee, nominating committee, funding review committee, HMIS data quality committee, coordinated assessment committee, and a system coordination committee. These groups provide partners an opportunity to work together directly on high priority issues, to plan for addressing service gaps, and to create strategies that improve system coordination and outcomes.
- Community. Representatives from more than 20 systems including mental health, foster care and child welfare, criminal justice, primary and secondary education, neighborhood institutions, local government, hospitals, community action agencies, philanthropic organizations, and the faith-based community collaborate through the Coalition.

The CoC is comprised of organizations directly serving households and individuals experiencing housing crisis and other related service organizations. It has seven major responsibilities as stated in its governance charter:

1. Convene regular meetings of the full membership, with published agendas, at least semi-annually.
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 (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 as needed.
5. In consultation with the collaborative applicant for HUD funds and the Homeless Management Information System (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

6. Monitor recipient and sub-recipient performance, evaluate outcomes, and take action against poor performance, establish performance targets appropriate for population and program type in consultation with recipients and sub-recipients, monitor performance and take action against poor performers.
7. Establish and operate a centralized or coordinated assessment system, in consultation with recipients of Emergency Solutions Grants program funds establish and consistently follow written standards for providing CoC assistance with those funds.

### **Vision to End Homelessness 10 Year Plan and the Coalition's 2015-2017 Strategic Plan**

In 2004, the Coalition, in collaboration with a wide variety of community leaders, created *The Vision to End Homelessness*, the community's plan for preventing and ending homelessness in Grand Rapids within 10 years. In April 2015, the Continuum of Care approved a 3-year Action Plan to End Homelessness for 2015-2017. This plan, which builds upon the Vision, outlines the following specific goals:

1. End Veteran Homelessness by the end of 2017
2. End Chronic Homelessness by the end of 2017
3. End Youth and Family Homelessness by 2020
4. Lay the pathway to end all homelessness in Kent County 2020

The Action Plan also lays out specific steps to achieve the Community goals as follows:

1. Ensure adequate supply of permanent housing resources for targeted populations (e.g. permanent supportive housing for chronically homeless)
2. Ensure high performance programming to support successful exits from homelessness
3. Support efforts in the community to maintain and increase affordable housing

The plan outlines seven performance measures that will be used to gauge success in reaching these identified goals:

1. Reduce the number of people who experience homelessness (Measurement: Establish HMIS baseline)
2. Reduce the number of unsheltered households (Measurement: Central Intake Data)

3. Reduce the length of time households experience homelessness (Measurement: HUD Outcomes reports compared to state benchmarks)
4. Reduce the number of times any household experiences homelessness (Measurement: HUD System Performance measures, post program exit)
5. Increase the percentage of households exiting to permanent housing (Measurement: Establish HMIS reports with baseline (Goal of 92 percent in 2015 across CoC funded programs)
6. Improve employment rate and income amount (Measurement: Establish HMIS reports with baseline (Goal of 27 percent across CoC-funded projects in 2015)
7. Increase the number of units dedicated to chronically homeless (Measurement: Establish HIC baseline (Goal of 429 dedicated beds in 2015)

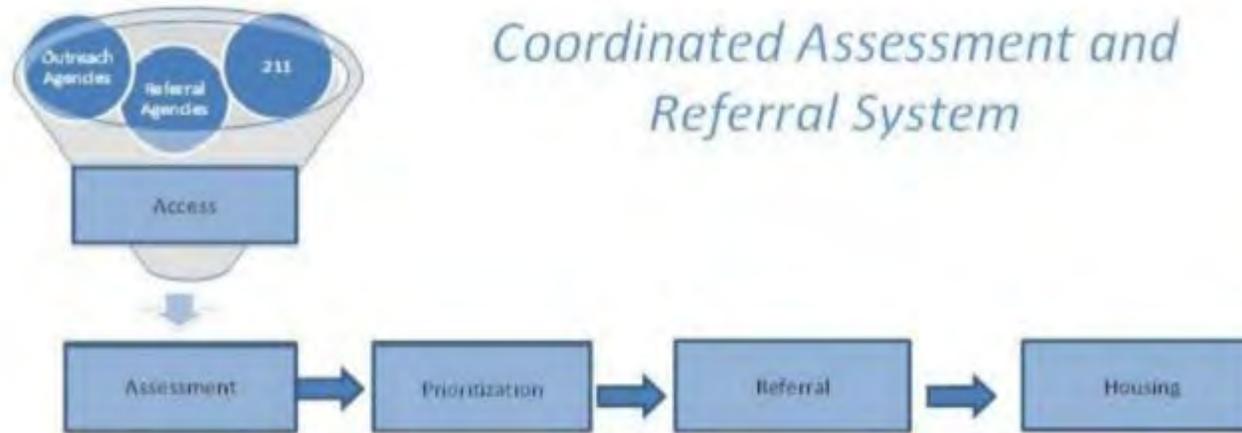
### **Coordinated Assessment**

The CoC Program interim rule at 24 CFR 578.7(a)(8) requires that CoCs establish a Centralized or Coordinated Assessment System. A Centralized or Coordinated Assessment System is meant to improve system-wide entry, assessment and referral of homeless people or those at risk of becoming homeless.

In August of 2014, the Coalition adopted and began implementing the Centralized Intake Committee Coordinated Assessment (CA) and Referral System Policy and Procedures. The Salvation Army is the Centralized Intake Agency that manages the Coordinated Intake and Housing Assessment Program (HAP). The steps in the Coordinated Assessment and Referral System are outlined in the

following diagram and further defined below:

**Figure 3.19: Coordinated Assessment and Referral System**



Source: Grand Rapids Area Coalition Centralized Intake Committee Coordinated Assessment and Referral System Policy and Procedure document.

**Access:** An individual or family household can access the CA system in several ways – through contact with 211, a designated Outreach Agency or a designated Referral Agency. A quick screen determines homeless status, and if the individual or family is determined to be homeless, a referral is made to the HAP – the designated Centralized Intake Agency.

**Assessment:** Once the HAP verifies homeless status, a Housing Management Information System (HMIS) Assessment is completed. Those homeless due to domestic violence may be referred to the Domestic Crisis Center. Households at risk of homelessness are referred to Prevention/Diversion resources. Those who meet the definition of homelessness are given a Service Prioritization Decision Assistance Tool (SPDAT), and are referred to temporary housing. For those households that receive a pre-screen score of five or more, a full SPDAT will be conducted in about two weeks. Homeless Status is determined using the HUD definition of Homelessness as defined in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Regulations. The

Categories 1, 2, and 4 are approved for use and in special circumstances, other funder definitions or requirements may be used as well.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

**Table 3.25: Number of Persons Experiencing Homelessness**

Population	Estimate the # of persons experiencing homelessness on a given night*		Estimate the # experiencing homelessness each year**	Estimate the # becoming homeless each year**	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
<b>Persons in Households with Adult(s) and Child(ren)</b>	0	439	4,649	4,535		
<b>Persons in Households with Only Children</b>	0	13				
<b>Persons in Households with Only Adults</b>	26	431	3,328	3122		
<b>Chronically Homeless Individuals</b>	7	43	699	630		
<b>Chronically Homeless Families</b>	0	0				
<b>Veterans</b>		7	458			
<b>Unaccompanied Youth</b>	N/A	N/A	162	160		
<b>Persons with HIV</b>	0	0				

\*Source: 2015 Grand Rapids Area CoC Point-in Time Date 1/28/15

\*\*Source: 2014 Grand Rapids Area Unduplicated Homeless Count HMIS Data

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

A HMIS report identified 7,864 individuals that experienced homelessness during 2014. Of these, 4,649 people were in families, including 2,414 children and 2,235 adults. Eighty percent of these families were female headed aged 18-34, and 20 percent of these families were male headed aged 25-34. Seventy percent of the homeless children range from newborn to 10 years old.

The Point-in Time Count (PIT) administered on January 28, 2015 found 439 individuals in 136 families with at least one adult and child in emergency shelters (27 families) or transitional housing (109 families). The 439 individuals included 291 children under the age of 18 years, 39 persons between the age of 18-24, and 109 persons over 24 years. The average household size was 3.2 persons.

**Veterans:**

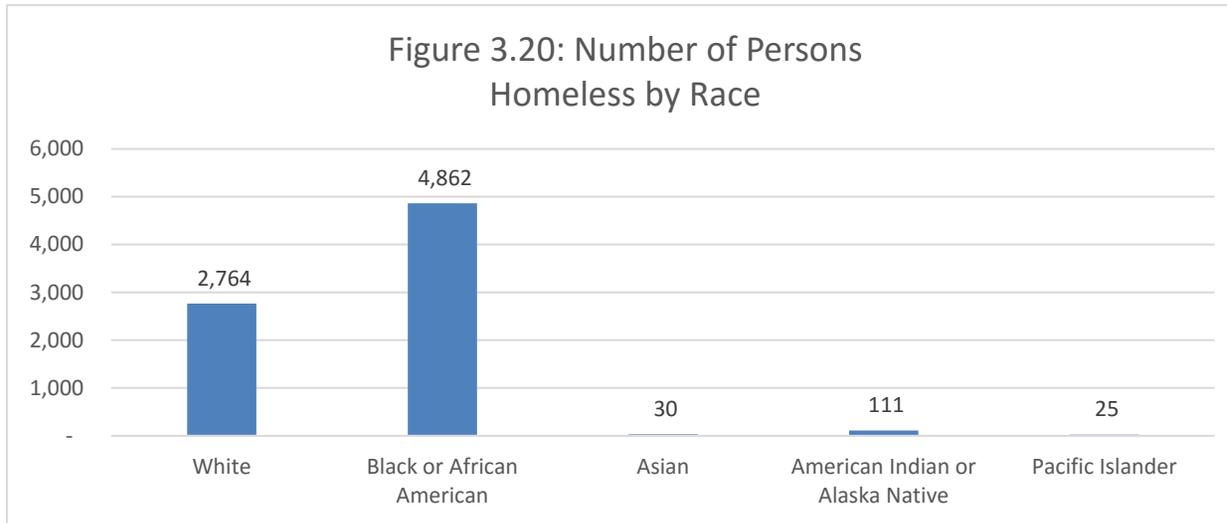
The 2014 Annual Housing Activity Report (AHAR) identified 533 families in emergency shelters (five of which were veteran families) and 649 families in transitional shelters (13 of which were veteran families). HMIS recorded 458 homeless veterans, or 5.82 percent of the total homeless recorded during 2014. The 2015 PIT counted 7 veterans. All 7 veterans were sheltered.

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

Of the 7,864 people reported as homeless through HMIS in Kent County during 2014, 4,862 or 62 percent were African American, while 2,764 or 35 percent were white. The next highest percentage were American Indian or Alaskan Native at 111 people or 1 percent.

Figure 3.20: Number of Persons Homeless by Race



Source: 2014 Grand Rapids Area Unduplicated Homeless Count HMIS Data

The 2015 PIT Count reported the following:

Table 3.26: 2015 PIT Count

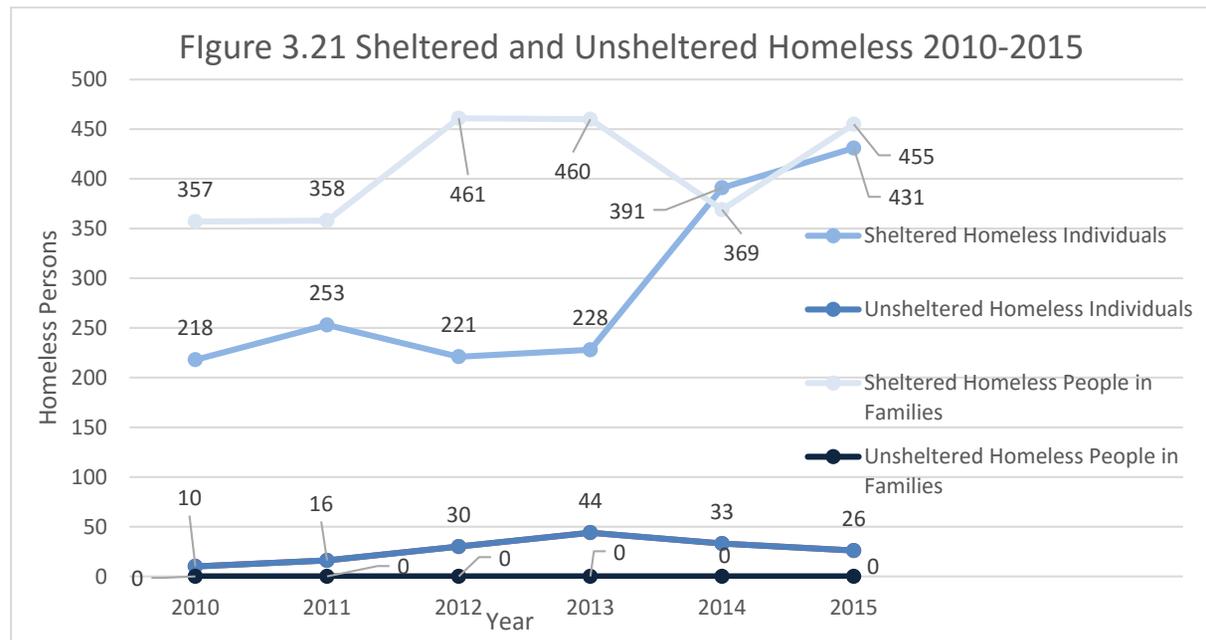
Race	Sheltered*	Unsheltered (optional)
White	372	16
Black or African American	442	7
Asian	2	0
American Indian or Alaska Native	10	0
Pacific Islander	2	0
Ethnicity	Sheltered	Unsheltered (optional)
Hispanic	112	5
Not Hispanic	774	21

Source: 2015 Grand Rapids Area CoC Point-in Time Date 1/28/15. Does not include those listed as "multiple races" - 25 emergency shelter, 33 transitional shelter and 3 unsheltered.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

Of the 912 persons counted as homeless in the 2015 PIT, 886 persons (97 percent) were sheltered, with the remaining 26 persons (3 percent) unsheltered. The sheltered homeless were staying in either emergency shelters (408) or transitional housing (478).

As depicted in the figure below, the number of homeless households without children grew significantly between 2013 and 2014 and remained high in 2015. No unsheltered families were reported between 2010 and 2015.

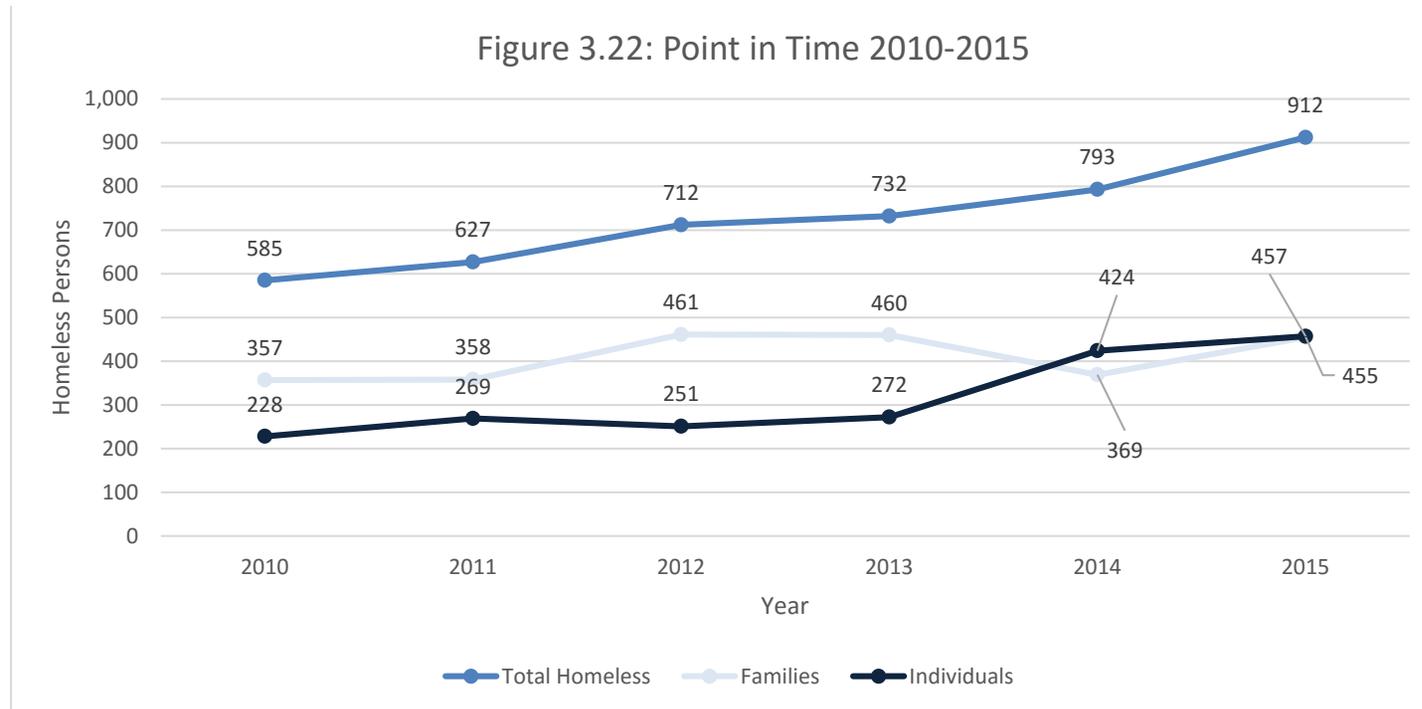


Source: 2010 - 2015 PIT data

The 2014 AHAR shows 1,815 people served in emergency shelters and 956 in transitional housing (note that emergency shelters and transitional housing may serve the same person multiple times during the year, and thus the total includes some duplication).

**Discussion:**

As illustrated by Figure 3.21, the number of homeless in the Grand Rapids, Wyoming and Kent County region has risen each year. The number of individuals remained fairly steady until 2014, when it increased from 272 to 424 and then to 457 in 2015. After growing between 2010 and 2013, the number of individuals in homeless families dropped in 2014, but then increased again in 2015.



Source: PIT Data 2010-2015

## The Causes and Needs

The reasons that typically contribute to and cause homelessness are varied but include the following in Kent County:

- Decline in public assistance
- Divorce
- Domestic violence
- Drug and alcohol related problems
- Illness
- Job loss
- Lack of affordable housing
- Lack of child support
- Low wages
- Mental illness
- Natural disaster/fire
- Physical disabilities
- Post-traumatic stress disorder
- Poverty
- Severe depression
- Family or personal tragedy

Regional consultation identified the following service needs for Kent County:

- Transportation options during peak and non-peak daytime and evening hours. This need creates difficulty for people to get to work regularly (especially if working 3<sup>rd</sup> shift) and on time.
- Lack of permanent supportive housing units. The lack of units makes it difficult to move people once they have been in emergency shelters or transitional housing for the maximum allowable length of stay
- Lack of affordable housing options. Rising housing costs means there are few options for those transitioning out of permanent supportive housing and makes it difficult to secure housing using an HCV.
- Lack of funds for supportive services.

During the focus groups, shelter providers also reported that the demand for services and housing for homeless families in particular is increasing, but that demand in general continues to grow.

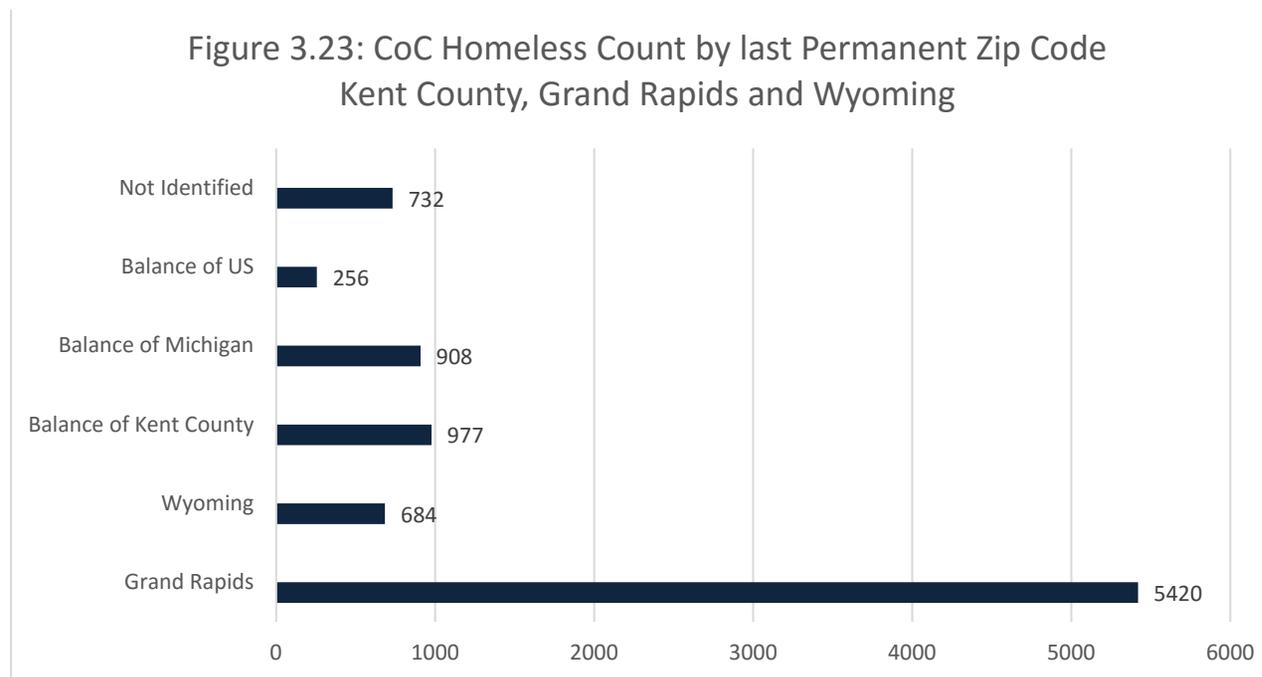
Gaps were identified in the following services:

- Emergency and outreach services for youth
- Supportive (mental health and substance abuse) service availability during non 8:30am-5pm timeframe
- Case management

### Geographic Specific

The figure below shows distribution of homeless persons based on most recent addresses. Sixty percent of homeless persons reported in HMIS in 2014 were from Grand Rapids, relative to 8 percent from Wyoming, 11 percent from the balance of Kent County, and 13 percent from outside of Kent County. An additional 8 percent of persons identified did not have a last zip code recorded.

Jurisdiction-specific focus groups and resident surveys provided additional information on perceptions of homelessness needs for each jurisdiction.



Source: 2014 Grand Rapids, Wyoming and Kent County data by zip code of reported last address. In a few cases, data for zip codes that crossed jurisdictional boundaries were distributed pro rata based on area.

## **Kent County**

Resident survey results showed that just under 50 percent of the respondents believe that homeless and housing crisis services are a low priority need in their Kent County Community and another 40 percent believe they are a moderate or high priority need.

The Kent County Focus Group discussion identified youth homeless outreach services, general services for the homeless, and job placement services for the homeless as needs. Voting results from the focus group identified the following three top priority homelessness needs as:

1. Supportive Services
2. Homelessness Prevention
3. Addictions Services

## **Grand Rapids**

As illustrated by the figure above, Grand Rapids is the last place of residence for the majority of Kent County's homeless population. Resident survey results showed that just over 30 percent of the respondents believe homeless and housing crisis services are a high priority need and another 30 percent of respondents believe they are a moderate level priority need in Grand Rapids.

## **Wyoming**

The survey results showed that about 35 percent of the respondents believe homeless and housing crisis services are moderate priority needs in Wyoming and just under 25 percent believe that they are high priority needs.

Within the Wyoming specific focus group, Homelessness Prevention received the second highest number of votes of all potential needs, with only the "Development of Units for Low Income Renters" receiving more. Within just the homeless needs category, the following needs were identified as top priority:

1. Homelessness Prevention
2. Youth Outreach & Services
3. Permanent Supportive Housing

The homelessness breakout group also identified the Godfrey-Lee school district as a geographic location that has high needs for homeless or those at risk of becoming homeless.

## NON-HOMELESS SPECIAL NEEDS ASSESSMENT - 91.205 (B,D)

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### Describe the characteristics of special needs populations in your community:

Special needs populations include frail and non-frail elderly, persons with physical disabilities, persons with mental or behavioral disabilities, persons with HIV/AIDS, persons with alcohol and drug addictions, and victims of domestic violence.

#### **Elderly**

Needs of Elderly include increasing accessibility of housing and public spaces to accommodate wheelchairs and other physical disabilities, need for meals on wheels or other meal services, and need for transportation services. According to the 2012 ACS, there were 65,145 elderly, defined as those over the age of 65, in Kent County.

#### **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. According to the 2012 ACS, there were 15,183 elderly people in Kent County who are likely considered frail because they have either self-care or independent living difficulty. Self-care difficulty is defined as having difficulty bathing or dressing. Independent living difficulty is when someone, due to a physical, mental or emotional problem, has difficulty doing errands alone such as visiting a doctor's office or shopping.

#### **Disability**

Physical disabilities can include hearing, vision, cognitive, ambulatory, self-care or independent living difficulties. The disability rate in Kent County is 10.5 percent, Grand Rapids is 11.6 percent, and Wyoming is 11.3 percent. As shown in the table below, the incidence of disabilities increases significantly for those aged 65 or older.

**Table 3.27: 2012 Disability Rates**

Disability 2012 Census	Kent County				Grand Rapids				Wyoming			
	Under 5	5-17	18-64	65 & Over	Under 5	5-17	18-64	65 & Over	Under 5	5-17	18-64	65 & Over
Disability Rate	0.5%	5.7%	8.9%	35.0%	0.2%	6.4%	9.8%	40.3%	1.4%	7.0%	10.3%	35.9%
Hearing Difficulty	125	539	6,163	9,746	31	214	1,733	3,076	29	81	1,050	869
Vision Difficulty	113	685	4,894	3,730	9	249	1,984	1,304	56	1,388	680	465
Cognitive Difficulty	*	5,161	15,339	5,670	*	1,571	5,620	2,113	*	746	2,116	732
Ambulatory	*	504	15,886	13,948	*	161	6,063	4,865	*	22	2,408	1,631
Self-Care	*	917	6,319	4,705	*	315	2,252	1,570	*	96	1,061	592
Independent Living	*	*	12,217	10,478	*	*	4,498	3,864	*	*	1,706	1,137
Overall Disability Rate	10.5%				11.6%				11.3%			

Source: ACS 2008-2012 Estimates

**Developmental Disability, Mental Illness and Substance Use Disorders**

Network180 serves as Kent County's community mental health agency and its board members are selected by the Kent County Board of Commissioners. The agency works through a network of providers and serves as the gateway to a wide range of mental health, substance use disorder, and developmental disability services throughout the county. During 2014, network180 served a total of 18,282 people, 66 percent with mental illness, 21 percent with substance use disorders, and 14 percent with developmental disabilities.

**Table 3.28: Persons with Developmental Disability, Mental Illness, and Substance Abuse Disorders - 2014 (Unduplicated)**

Population	Age	Medicaid	Non-Medicaid	Total
Developmental Disability	Adult	1,976	29	2,005
Developmental Disability	Child	460	43	503
Mental Illness	Adult	5,681	2,409	8,090
Mental Illness	Child	3,422	487	3,909
Substance Use Disorder	Adult	1,949	1,591	3,540
Substance Use Disorder	Child	182	53	235
<b>TOTAL</b>		<b>13,670</b>	<b>4,612</b>	<b>18,282</b>

Source: Network180

### Domestic Violence

Victims of domestic violence, including dating violence, sexual assault, and stalking, are a special needs population. YWCA and Safe Haven are the two primary providers serving victims of domestic violence in Kent County.

Because domestic violence is often unreported, it is difficult to track. One way to demonstrate need is through those seeking shelter. According to the YWCA, from September 1, 2014 – August 31, 2015, 456 children and 399 adults requested shelter from the YWCA emergency shelter, while 171 children and 93 adults requested transitional housing during the same period. Although domestic violence service providers coordinate with the Coalition, people served by these agencies are not reported in the Homeless Management Information Systems (HMIS).

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

Discussions with focus groups and other consultations found that the housing and supportive service needs of special needs populations largely match those of other low-income and homeless communities within the region and are discussed in their respective sections. While the scope of supportive services varies based upon an individual’s characteristics, following is a list of services commonly needed by non-homeless people with special needs. These services may be provided either on- or off-site:

- Accessible housing
- Advocacy, referral, information
- Case management
- Child care
- Counseling
- Crisis hotline
- Education
- Employment training
- Family and caregiver support
- Financial assistance
- Health care

- Home management activities
- Interpretation services
- Legal assistance
- Meal and nutrition services
- Medical and therapeutic services
- Safety planning
- Services for the homebound
- Socialization services
- Support groups
- Transportation
- Welfare/protective services

## NON-HOUSING COMMUNITY DEVELOPMENT NEEDS – 91.215 (F)

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### Describe the jurisdiction’s need for Public Facilities, Improvements and Services:

Non-housing community development covers a broad range of needs, including public facilities, infrastructure and transportation, human services, and neighborhood services. Within the three jurisdictions, these needs are primarily addressed by a broad range of funding sources, supplemented with targeted HUD funding. Existing local and regional plans helped identify needs and were complemented by resident surveys and stakeholder focus groups.

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### Describe the jurisdiction’s need for Public Facilities and Improvements:

The jurisdiction’s needs for public facilities and improvements include, but are not limited to, the following areas noted by participants in focus groups and surveys:

- 1. Streets, alleys and sidewalks:** Improvements are needed in streets, alleys and sidewalks, including streetscapes and tree planting. Focus group participants representing regional transit needs especially noted a need for extension of sidewalks near suburban employers to connect to transit stops and transportation improvements, such as snow management at bus stops.
- 2. Spot flooding:** Given the frequency of spot flooding in parts of the county, disaster mitigation improvements are needed (drainage, appropriate treatment of flood plains, etc.). Flooding occurs when Buck Creek rises and falls rapidly during big storms closing off expressway ramps and access to portions of the city.
- 3. Bike/non-motorized routes:** Continuing extension and maintenance of bike routes and other non-motorized connections is needed.
- 4. Improved walkability:** Grand Rapids, Wyoming and other suburban areas need investment to increase walkability
- 5. Sewer improvements in rural communities:** Some rural communities in Kent County need sewer systems or improvements.
- 6. Wyoming community center:** Wyoming lacks a community center other than its senior center.

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## How were these needs determined?

- 1. Streets, alleys and sidewalks:** Resident survey respondents identified Streets as the highest priority need in all three jurisdictions. The Kent County Road Commission 2015 Strategic Plan identified a high need for construction and preservation of both primary and secondary roads throughout the county. The plan identified unmet needs of \$19 million in this category to maintain 85% of roads in good or fair condition. The Transportation/Infrastructure focus group gave transportation improvements a high priority, focusing on sidewalk extension. Persons taking public transit to employment often find that the stop is some distance from their work, and there are no sidewalks or other safe pedestrian connections. In addition, the City of Grand Rapids Vital Streets Task Force issued a report in 2013 outlining street repair and maintenance needs, identifying a need for annual investment in streets and sidewalks of \$22 million per year for the next 15 years.<sup>1</sup> The City’s Vital Streets Oversight Commission makes recommendations to the city annually on street investments.
- 2. Spot flooding:** Participants in the Infrastructure and Wyoming focus groups cited the frequency of flooding in low-lying parks, intersections, and neighborhoods.
- 3. Bike/non-motorized routes:** Focus group participants cited the increasing use of bike paths and the public health benefits of increasing non-motorized connections.
- 4. Improved walkability:** Suburban areas of Kent County were developed using auto-dependent single-use areas. Focus group participants cited an increasing priority for form-based development, emphasizing walkable connections between neighborhoods and commercial and public services. Increased focus on “walkability” factors by MSHDA, the state allocating agency for low-income housing tax credits (LIHTCs), has resulted in Wyoming and other post-war communities being unable to compete for scarce LIHTC awards. Wyoming has adopted its “28 West” plan to create walkable mixed use areas with increased housing density along 28<sup>th</sup> Street, its main traffic corridor.
- 5. Sewer improvements in rural communities:** Participants in the Kent County Focus Group noted that senior housing development in some communities is not possible because they lack sewer and water systems.

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<sup>1</sup> <http://grcity.us/enterprise-services/officeofenergyandsustainability/Sustainable%20Streets/2-12-13%20SSTF%20Presentation%20-%20FINAL.pdf>

**6. Wyoming community center:** Participants in the Wyoming Focus Group noted that the city has no general purpose community center or other facilities for youth to gather; they also noted the lack of local facilities needed to support a range of neighborhood-based services such as affordable child care and job training.

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#### **Describe the jurisdiction's need for Public Services:**

- 1. Job training** including training appropriate for trainees (job readiness).
- 2. Homeless supportive services:** Persons who were formerly homeless but are living in permanent supportive housing need robust social services to successfully remain in their housing.
- 3. Senior Services:** Nutrition services are especially needed for seniors aging in-place.
- 4. Health care** is needed for populations such as persons with immigrant status who do not qualify for health care plans.
- 5. Language services** are needed by a growing Hispanic population; the presence of other cultures was noted as well.
- 6. Public transportation:** Job training and other services can be inaccessible because of limited access to public transportation, especially given increasing regionalization of job training services. The region needs improved public transit routes and hours of service; in addition, there is a continuing need for rural public transit.
- 7. Youth Services** is a high priority need in all three jurisdictions.
- 8. Crime Prevention Education and Neighborhood Organizing** were both identified as high priority needs in the cities of Wyoming and Grand Rapids. Participants in the Grand Rapids Neighborhood Association focus group noted that while crime may be reduced in one area, it may transfer to another neighborhood.

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#### **How were these needs determined?**

**1. Job training:** Both the economic development and public services focus groups gave job training a high priority. Participants noted that job training should be focused on the skills, interests and abilities of trainees and not solely on the regional needs of employers. They noted that many job training programs extend 6-9 months, but many trainees cannot defer income for that long. They added that job training programs should lead to jobs at employers that are geographically accessible (or provide transportation from places readily accessible by public transit), and should lead to jobs that pay a living wage. Resident surveys also supported job training as a priority economic development need.

- 2. Homeless supportive services:** Permanent supportive housing providers in the Continuum of Care consultation reported that formerly homeless persons, especially chronically homeless individuals and families, need readily available services and intervention to maintain their housing, including on-site supportive services available at all hours.
- 3. Senior services:** The Public Services focus group noted the importance of Meals on Wheels and other in-home services to ensure that seniors can successfully age in place. Senior services were ranked as one of the highest priority public service needs by Kent County respondents.
- 4. Health care:** The Public Services focus group noted the gap between preventative healthcare services to individuals that don't qualify for health coverage due to immigration status; many wait for an emergency and go to ER rather than obtain preventative health care.
- 5. Language services:** ACS data illustrates the increasing numbers of Hispanic persons in Kent County, especially in census tracts of Grand Rapids and Wyoming. In addition, focus group members cited the need for bi-lingual and bi-cultural programs for Hispanics, as well as literacy and other language services. They also noted the presence of Burmese and Bangladeshi populations in Kent County.
- 6. Public transportation:** Participants in both the economic development and public services focus groups noted that workers have a hard time accessing places of employment, either because the worksite is not near a transit route or because the hours of transit service do not enable workers to get to a 2<sup>nd</sup> or 3<sup>rd</sup> shift job; one service provider noted that at least 10 workers had to turn down living wage jobs because they couldn't get to work. Others cited the increasing regionalization of job training as creating transportation issues for trainees. Others cited difficulties accessing child care or social services. Some focus group members suggested promotion of employer-funded van pools. Resident survey responses also identified a particular need for transportation in Kent County (outside of Grand Rapids and Wyoming), where 40 percent indicated there is not adequate transportation available to get to/from work, shopping and services, and a third identified transportation service as a high priority need. Rural residents' use of services provided by North Kent Rural Transit has required that the County allocate a substantial portion of its CDBG public service funding for this purpose.
- 7. Youth Services:** Residents in all three jurisdictions ranked Youth Services as the highest priority among all public service categories.
- 8. Crime Prevention** education was identified in both Grand Rapids and Wyoming resident surveys as a high priority need.

# Market Analysis

## SECTION IV: MARKET ANALYSIS

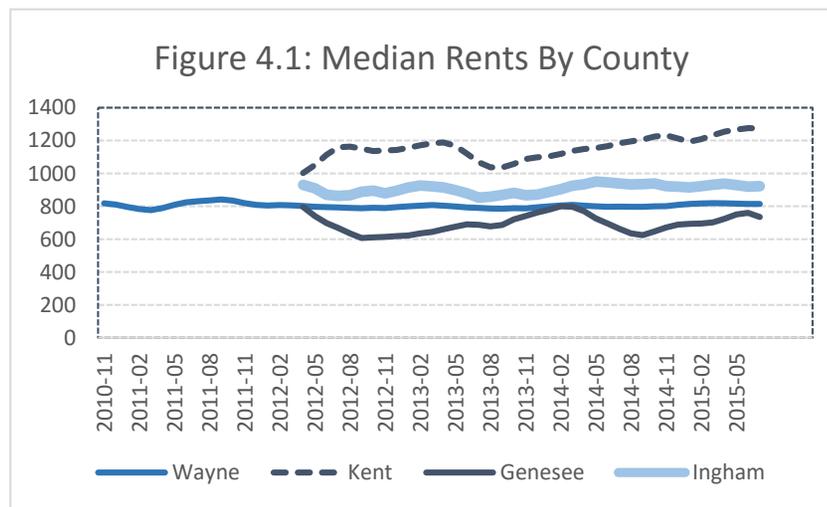
### Overview

Since the foreclosure crisis, which peaked nationally in 2009-2010, the rents and real estate values in Kent County have recovered to a greater degree than in other large urban counties in Michigan. Figures 4.1 and 4.2 compare Kent County with other large urban counties (Wayne, Ingham, and Genesee Counties) in both their for-sale and rental markets.

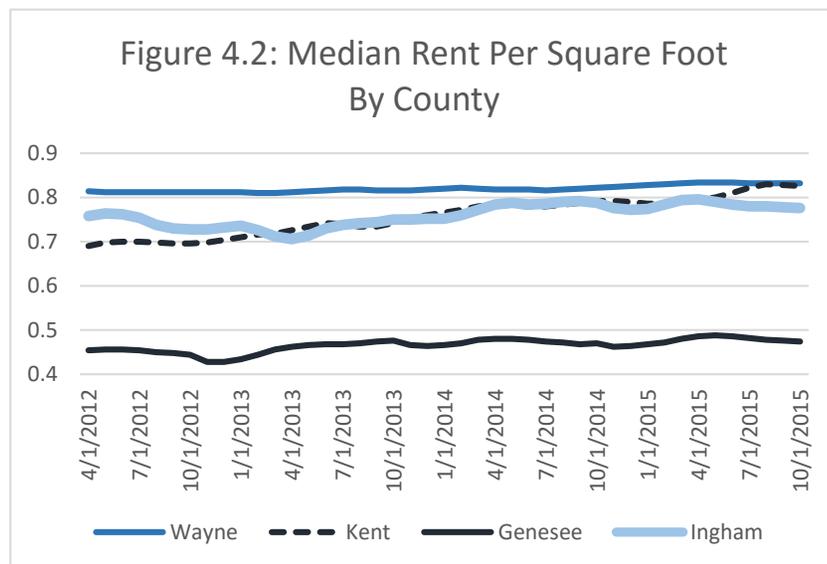
Low-income households are heavily dependent on a supply of affordable rental housing, which is very scarce in the regional market. Figure 4.1 shows a significant rise in median rents in Kent County compared to other urban Michigan counties. Figure 4.2 shows a rise in median rent per square foot among all four counties. While Wayne, Genesee, and Ingham counties experienced 2.2, 4.4, and 2.3 percent growth respectively between 2012 and 2015, the median rent per square foot in Kent County rose 19.7 percent over the same time period. These increases reflect a growing scarcity of rental housing in the market.

Record low vacancy rates have rapidly increased median rents well above the rental amount allowed by the Housing Choice Voucher program, leaving a scarcity of properties available for rent at rates that a voucher will reimburse. The result has been a severe shortage of units available to voucher holders.

Median sale prices of homes fell sharply after 2008 but have been steadily rising again across the four counties shown in Figure 4.3. Sales prices in Kent County have remained relatively stable while other urban counties experienced greater drops in sale prices in the years after 2008.



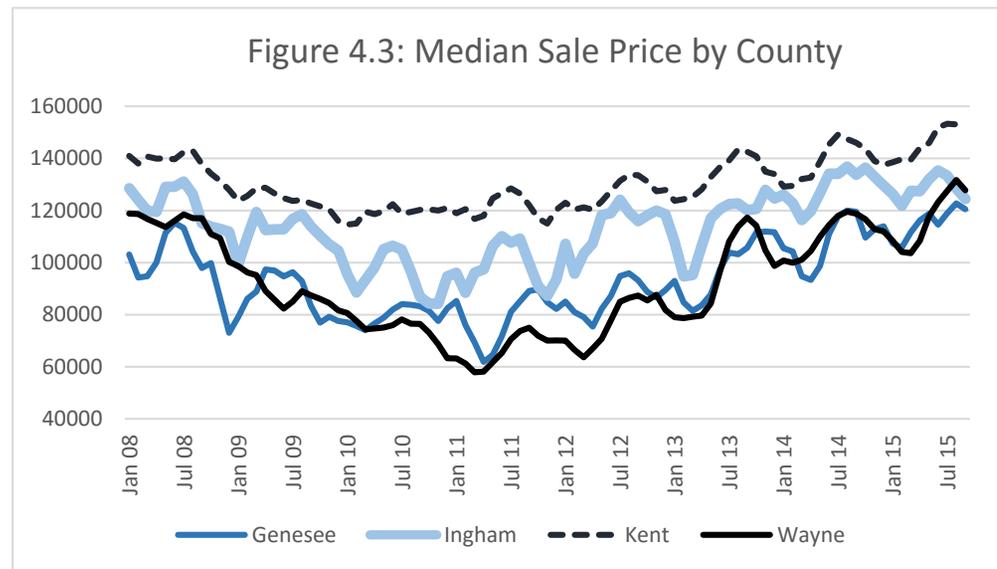
Source: Zillow



Source: Zillow

This environment creates a market context that is atypical for Michigan metro areas, similar to a few other smaller, but similarly vibrant markets (e.g., Ann Arbor, Holland, Traverse City, and Marquette). All of these are centers of fairly robust growth, which create employment opportunities and sustain economic growth, but present challenges for ensuring a supply of affordable housing.

In a tight market, low rental vacancy reduces rental housing choices, especially for low-income households. Unsubsidized housing at moderate rents is increasingly likely to be far from the metro center, disconnected by transit lines from employment opportunities and other amenities, and less suitable for the longer-term needs of many households. These constrictions will place a premium on creative problem solving, planning and programming to preserve and ensure that affordable housing is available near the vibrant employment and service centers of Kent County, Grand Rapids and Wyoming.

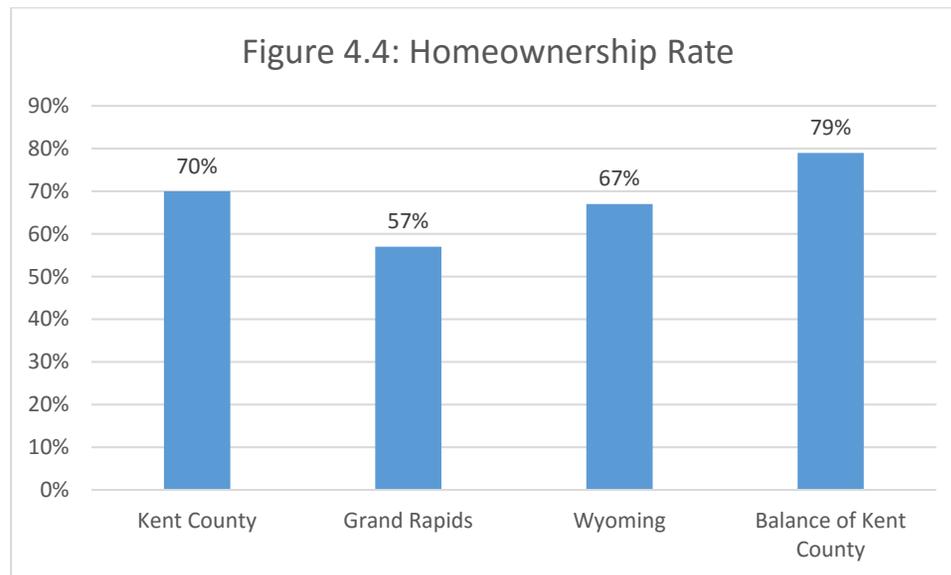


Source: Zillow

## NUMBER OF HOUSING UNITS – 91.210(A)&(B)(2)

### Introduction

According to the 2008-2012 American Community Survey, there are 246,875 housing units in Kent County. The majority of these units (70 percent) are owner-occupied. Homeownership rates are significantly higher in the balance of Kent County (79 percent), outside of Grand Rapids and Wyoming. Figure 4.4 below highlights the owner occupancy rate for the HUD jurisdictions.



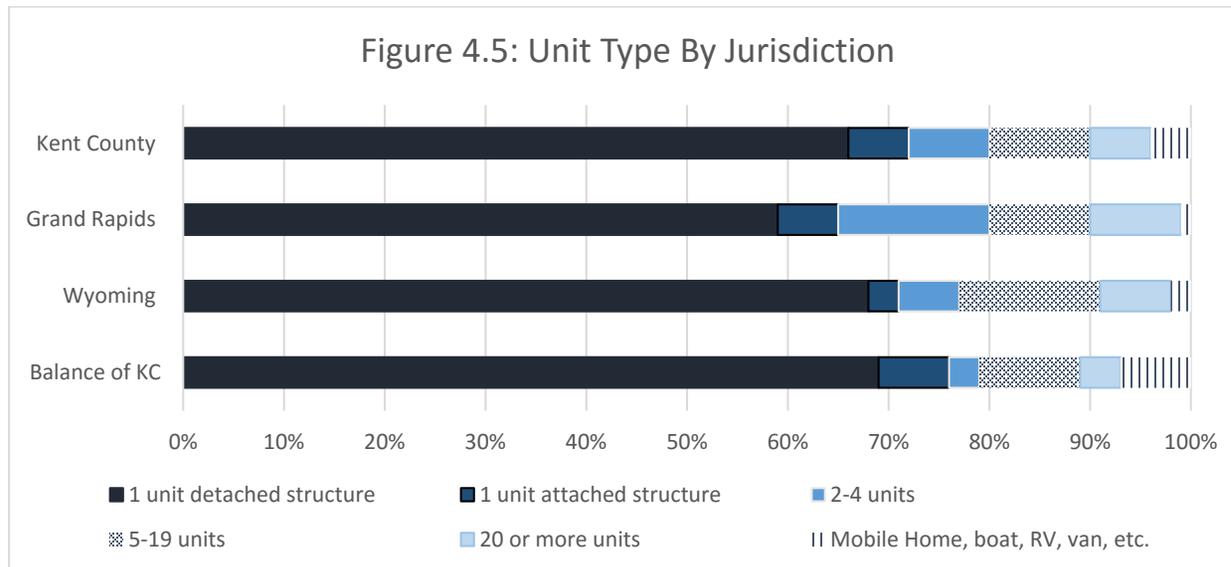
Source: 2008-2012 ACS

Figure 4.5 below depicts the housing unit types throughout Kent County, showing first the County as a whole, and then the typology for Grand Rapids, Wyoming and the balance of Kent County. The data below illustrate the following characteristics in the regional housing supply:

- Like most areas of Michigan, the communities of Kent County are comprised largely of single-family homes—more than 2 out of every 3 units outside of Grand Rapids and 59 percent of the housing units in the City of Grand Rapids. Many of these

single-family homes became rentals during the past housing crisis, especially in the urban neighborhoods of Grand Rapids, which are characterized by single-family homes built generally prior to World War II and laid out close together, with smaller yards, in gridded, dense neighborhoods. For decades, the housing stock has provided well-located and affordable owner- or renter-occupied housing that was especially appropriate for families with children. As the economy has improved, many of these units are being purchased by new owner-occupants at escalating prices in a market characterized by increasing demand. This generally positive trend for these urban neighborhoods will also, unfortunately, further limit rental opportunities in a region that has relatively fewer rental options than most large urban areas.

- The high share of single-family housing results in lower population density, creating challenges for ensuring accessible public transit. In addition, nearly half of units in large developments (20+ units/property) are located in Grand Rapids.
- Mobile homes are more prevalent in rural areas; nearly 90 percent of the mobile housing units in the region are outside of Grand Rapids and Wyoming (8,489 out of 9,446). Households occupying these units are often able to buy them at low costs, but later find that that their housing does not create equity and results in higher costs for utilities and sometimes, lot rent.



Source: 2008-2012 ACS

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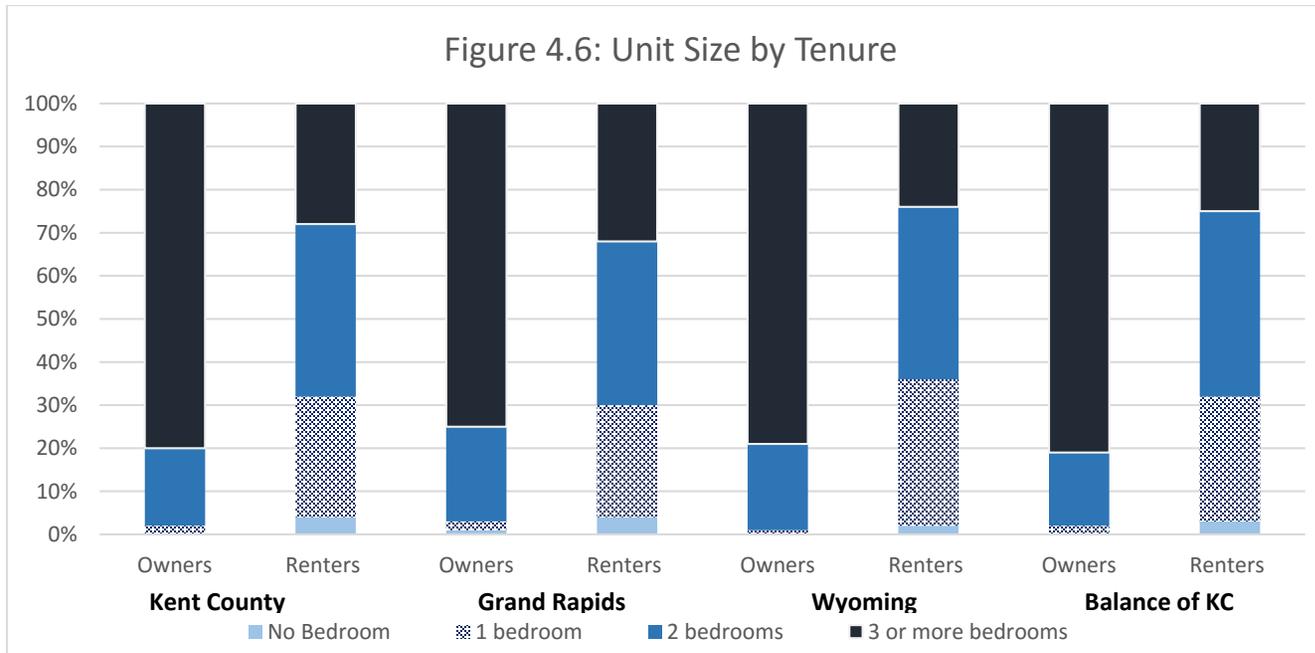
## Unit Size by Tenure

Figure 4.6 below illustrates the distribution of unit sizes by tenure type (i.e., number of bedrooms in owner vs. renter units). These data illustrate the continuing predominance of owner-occupied housing throughout the county region. The proportion of owner-occupied units compared to total units in each of the figures below illustrates the relative prevalence of owner-occupied housing in each jurisdiction.

The data in the figure below illustrates market implications resulting from the relationship of these housing types:

- Over 79 percent of the owner-occupied housing units in the region have 3 or more bedrooms, indicative of the high correlation of owner-occupancy with single-family homes. Units with 3 or more bedrooms are in the greatest demand for owner-occupants, who are often family households.
- Region-wide, about 40 percent of renters are in 2-bedroom units, with equal numbers of the remainder distributed between 1 and 3-bedroom units. This correlation may reflect that renters are most likely to be in apartments or 2-bedroom single-family homes, which may stay in rental occupancy longer than homes with more bedrooms.
- Grand Rapids houses a higher percentage of renters (over 32 percent) in units with 3 or more bedrooms, which may reflect a higher rate of rental occupancy of single-family homes.

Figure 4.6: Unit Size by Tenure



Source: 2008-2012 ACS

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

Kent County is served by four Public Housing Authorities (PHAs):

- Kent County Housing Commission
- Grand Rapids Housing Commission
- Wyoming Housing Commission
- Rockford Housing Commission

**Table 4.1: Public Housing Program Type and Number**

Program Type								
	Mod-Rehab	Public Housing	Vouchers					
			Total	Project - Based	Tenant-Based	Special Voucher Program		
						Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
<b># of Units/Vouchers Available</b>								
<b>Grand Rapids Housing Commission</b>	102	477	3,343	521	2,769			53
<b>Kent County Housing Commission</b>			508		180	153	175	
<b>Wyoming Housing Commission</b>		196	1,122		1,122			
<b>Rockford Housing Commission</b>		52	63		63			
<b>Total</b>	<b>102</b>	<b>725</b>	<b>5,036</b>	<b>521</b>	<b>4,134</b>	<b>153</b>	<b>175</b>	<b>53</b>
<b># of Accessible Units</b>								
<b>Grand Rapids Housing Commission</b>	4	27	23	23	*	*	*	*
<b>Wyoming Housing Commission</b>		9			*	*	*	*
<b>Total</b>	<b>4</b>	<b>36</b>	<b>23</b>	<b>23</b>	<b>*</b>	<b>*</b>	<b>*</b>	<b>*</b>

\*Number of accessible units cannot be determined for tenant-based vouchers, which are not tied to a specific unit

Sources: Local housing commissions and HUD Public and Indian Housing Information Center Data

The supply of public housing units across the four public housing authorities in Kent County is presented above in Table 4.1. These public housing units are displayed by PHA and program in Table 4.6 below.

Kent County programs include Veterans Affairs Supportive Housing (VASH) and Family Unification vouchers, but no public housing units. The continuing availability of these special purpose vouchers depends on future HUD appropriations and the ability of the PHAs to continue to find units for which the voucher will provide an acceptable rent in the local market.

In addition, Grand Rapids, Wyoming and Rockford own 725 public housing units, including 36 accessible units. While these units provide a valuable resource of quality housing for very low-income tenants, the local PHAs of Kent County do not have resources to expand this inventory.

*Assisted Housing Inventory:* The Michigan Preservation Information Exchange (MiPIE)<sup>1</sup> provides access to a comprehensive listing of rental housing within the State of Michigan that has received financing from federal, state, or local housing agencies (See Appendix C: Assisted Housing Inventory). By checking the MiPIE inventory with Kent County local governments, the current inventory identifies 8,655 assisted/affordable units in Kent County. The list includes units developed under a variety of programs, including public housing, Low-Income Housing Tax Credits (LIHTC), Section 202/811 housing for elderly and handicapped residents, Section 236, state and local HOME funds, and a variety of other state and federal programs. Target populations include families, the elderly, and persons with disabilities (including physical, developmental and the chronically mentally ill).

*Permanent Supportive Housing (PSH) Units:* The Corporation for Supportive Housing recommends several criteria for identifying a unit as “permanent supportive housing”:

- The unit is a self-contained unit with a full, private bathroom. It may be an efficiency unit but would have a kitchen or kitchenette with a stove, refrigerator, sink and countertops;
- The unit would typically be rented with a one-year lease with supportive services provided as an opportunity for residents, not a condition of tenancy; and

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<sup>1</sup> <http://housing.state.mi.us/mipie/>

- While units may occasionally be rented to up to two unrelated adults, PSH units are generally rented to a single individual or household.

The assisted housing inventory described above indicates a total inventory of PSH units in Kent County at 623 units at 21 projects. In addition, Community Rebuilders provides approximately 267 units through vouchers not tied to a specific property, raising the total PSH units to 890. The Homeless Management Information Systems (HMIS) reports 865 PSH units—a listing which closely correlates with the count of 890 units.

Among these permanent supportive units, the assisted housing inventory in Appendix C includes 461 permanent supportive housing units that MSHDA reports were created since 1993. This total includes 325 units in 16 properties developed between 2005 and 2014, the period covered by the Kent County *Vision to End Homelessness*. MSHDA supports the development of these units through its LIHTC program, administered through the State’s Qualified Allocation Plan (QAP). The QAP describes the terms for making LIHTCs available statewide, including its criteria for competitive evaluation of credit applications. These units constitute a critical share of the PSH inventory available to homeless individuals in Kent County. In order to address the continuing need for opportunities for permanent supportive housing, MSHDA will need to maintain this priority for PSH units.

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

The assisted inventory identifies approximately 340 units in 9 properties that are expected to be lost to the affordable housing inventory within the current consolidated plan period. Most of these losses are from the HUD 202 (elderly) and 811 (persons with disabilities) Capital Advance Program. The assisted housing inventory will remain largely intact thanks especially to extended use agreements on several LIHTC projects that do not expire until after 2021. Additionally, none of the 4 PHAs serving Kent County report any expected loss of units or vouchers over the next 5 years.

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

Rapidly increasing rents have resulted in an acute scarcity of units affordable to low-income households. Although median rents have risen substantially in the last two years, HUD fair market rents (FMRs) have remained between \$730 and \$750/month for a 2-bedroom unit since 2010, and are currently at \$737. Since the FMR effectively sets the rent limit for a landlord accepting HUD rent

assistance through a Housing Choice Voucher, units are very scarce for households receiving rental assistance. They often must accept units farther from work, public transit, family supports and community amenities.

The Housing Authorities of Kent County report that ensuring full utilization of their allocation of vouchers is increasingly challenging. In September 2015, the Grand Rapids Housing Commission reported having near zero availability of qualifying and vacant units, countywide, for their 4,000 voucher holders. While the HUD-proposed FMR for 2016 increases to \$767 for a 2-bedroom unit, this four percent increase may do little to motivate property owners and managers to once again accept rental assistance vouchers to ease the scarcity of participating units.

In addition, property owners using HOME funds must hold rents to the “high HOME rents” and to the “low HOME rents” on 20 percent of the HOME units in projects with five or more HOME-assisted units. These rents, minus an allowance for tenant-paid utilities, are shown Table 4.4 below. As the gap between these rents and the “street rents” in the market continues to expand, local officials will need to identify increasingly motivating incentives for developers to maintain units at rents allowed by the HOME program to make up for the increasing lost revenue over the next 5-20 years of the HOME affordability period.

Until this disconnect between rental units and households with rent assistance is addressed, voucher-holders will face limited choices, often needing to accept units farther from work, public transit, family supports and community amenities. These longer-term market constrictions will place a premium on creative problem solving, planning, and programming to preserve and ensure that affordable housing is available for residents of Kent County, Grand Rapids, and Wyoming.

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**Describe the need for specific types of housing:**

Households without a car depend on public transit to get to work and to run errands that are inherent in daily living; other households with one car use public transit to reduce gas and parking costs if it is convenient and efficient. However, in Kent County, developers are beginning to consider access to public transit as a more substantial consideration in locating housing development.

Focus group participants identified the transportation challenges faced by many low-income renters with housing remote from transit access. While developers are becoming more aware of the importance of transit access in our changing urban environments, housing programs may also be able to achieve a win-win by building density that supports ridership. The MSHDA Qualified Allocation Plan (QAP) places a strong emphasis on walkable locations when awarding Low-Income Housing Tax Credits (LIHTCs) to

ensure that tenants have ready access to jobs and services. However, these criteria can disadvantage suburban locations—even those that are well-connected to transit—because they tend to have lower “Walkscores,”<sup>2</sup> disadvantaging many transit-oriented locations. MSHDA has begun taking input on its 2016-17 QAP, providing an opportunity for MSHDA to consider refinements that may make transit-oriented development a higher priority for LIHTC projects, to help meet this need.

In addition, consultation with the Continuum of Care illustrated that high demand for available units is causing property managers to tighten screening criteria, and persons facing challenges to independent living are unwelcome. Chronically homeless persons, for example, are typically able to find housing only in “Housing First” units dedicated for these populations.

Due to its predominance in the market, single-family housing also plays a critical role in the affordable housing inventory, resulting in a continuing need for rehab assistance for seniors and other low-income homeowners to preserve this valuable resource both for low and moderate income families, as well as to maintain a high quality of life in urban and small city neighborhoods. However, focus group participants noted that an increasing population of elderly homeowners are finding themselves “over-housed,” suggesting a need for the development of smaller rental units, not only for seniors who would like to down-size, but also for young professionals wishing to move to or remain in the area, but need moderately-priced housing options with access to jobs and transit.

## **Wyoming**

In 2013, as part of its Analysis of Impediments to Fair Housing, the City of Wyoming commissioned a Housing Needs Assessment, to provide data on the housing needs of the metro region, and more specifically, on the ways that the City of Wyoming could position itself for growth in the years ahead.<sup>3</sup> The Housing Needs Assessment identified an “Overall Housing Market” as “the area within a 20.1 minute drive of the corner of 28th Street and Burlingame Avenue, in the heart of Wyoming. 20.1 minutes represents the average commute time for a Wyoming resident.” Map 4.1 shows this Overall Housing Market, with its various housing typologies, in the thematically shaded area. While this area is focused on Wyoming, the mapped area suggests that it is typically representative of the housing market for the core Grand Rapids metro area in general.

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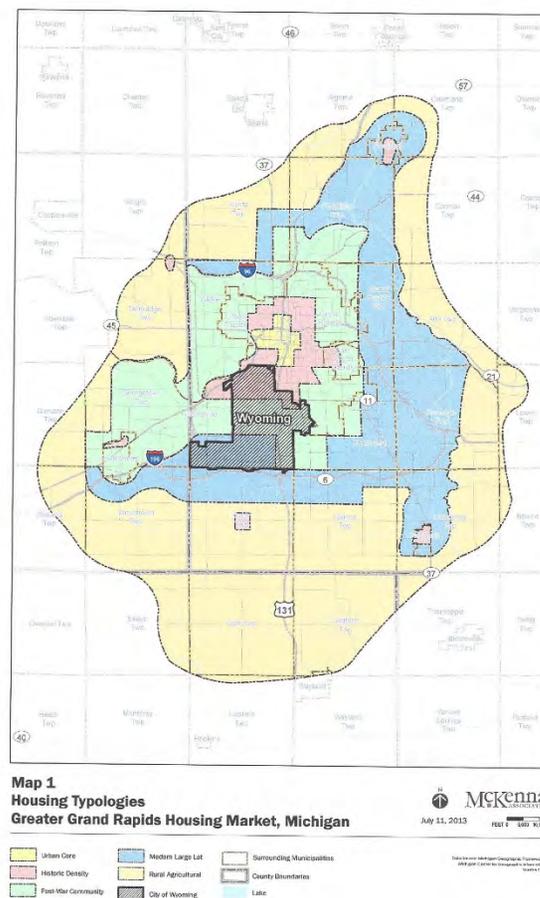
<sup>2</sup> See [www.walkscore.com](http://www.walkscore.com) for more information on the Walkscore site evaluation methodology.

<sup>3</sup> <https://www.ci.wyoming.mi.us/planning/FairHousingAndNeedsAssessment.pdf>

The assessment identified specific housing types in Wyoming and the region, including the Urban Core, Historic Density, Post-War Community and Modern Large Lot. In its conclusions the report identified several opportunities for development in Wyoming:

1. **Homestead properties are undersupplied regionally in the Urban Core typology.** This may indicate a demand for additional condominium buildings or townhouses along walkable and/or transit-oriented corridors. Additionally, there may be some “hidden” demand for additional Urban Core typology housing because households seeking this type of housing may not be able to find it due to the low supply, and therefore they end up living in other typologies, most likely Historic Density. The Division Avenue/Silver Line corridor and the DDA area along 28th Street should be targeted for this type of development. Metro Health Village may also be a possibility for Urban Core Typology housing, especially for seniors looking for convenient access to the health care facilities.
2. **There is a significant market for additional housing of the Historic Density typology, especially for owner-occupied units.** Well over 50 percent of the regional pent-up demand for owner-occupied Historic Density housing comes from Wyoming. Programs such as homeownership counseling, down payment assistance, and others that promote home ownership in this type of housing should be pursued, and new housing development in areas targeted for Historic Density typology housing should be incentivized. Further, outside the current Historic Density typology area, new developments can replicate the characteristics of the typology by utilizing New Urbanist principles. This can be incentivized by the city through the Planned Unit Development process.

**Map 4.1: Housing Typologies**



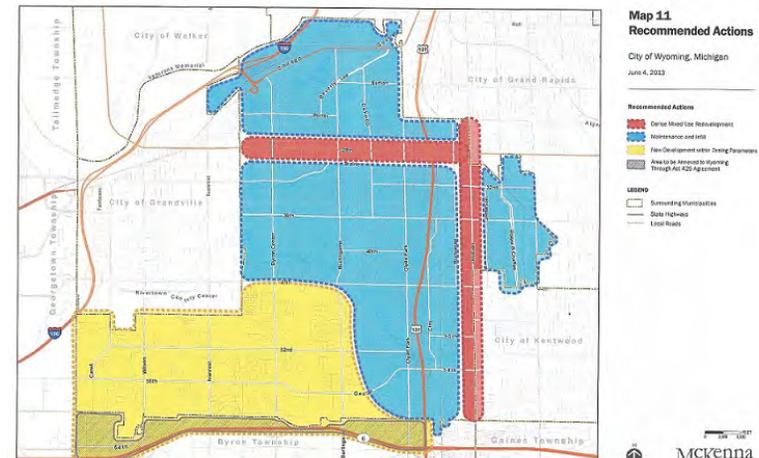
Source: City of Wyoming & McKenna Associates

3. **Rental housing in the Post-War Community typology is heavily demanded regionally, with a small undersupply in Wyoming.** Wyoming could attract this latent demand by incentivizing the development of high-quality multiple-family properties (preferably mixed income) as part of mixed-use developments with the Post-War Community Area. The former Taft Elementary School is currently being developed into assisted living, which is an example of this type of redevelopment. Another potential redevelopment site is the vacant former school site at Burlingame Avenue and 36th Street.
4. **There is pent-up demand for affordable housing in the Modern Large Lot typology, both rental and homestead.** However, developing low-income housing could be difficult in this part of the city due to resident opposition and the lack of amenities such as public transit. However, mixed-income properties using Low-Income Housing Tax Credits would create opportunities for lower-income households to live in the Modern Large Lot typology if they so choose. In some areas, the Master Plan calls for Large Lot estate residential. In these areas, large lots should continue to be encouraged to preserve the character of the area.

Based on future population growth, mobility, and aging patterns, the report shows a net oversupply of homestead properties of 10,842 units, throughout the Overall Market Area; these projections are based on an oversupply of homes above \$100,000 which is greater than the undersupply below \$60,000. By contrast, for rental properties, the report shows an overall net undersupply of 26,309 units, reflecting an undersupply of over 30,000 units with rents under \$559/month and a more balanced inventory above that amount.

The Housing Needs Assessment recommendations include proposed target areas for future development planning in Wyoming, as shown in Map 4.2.

**Map 4.2: Recommended Actions**



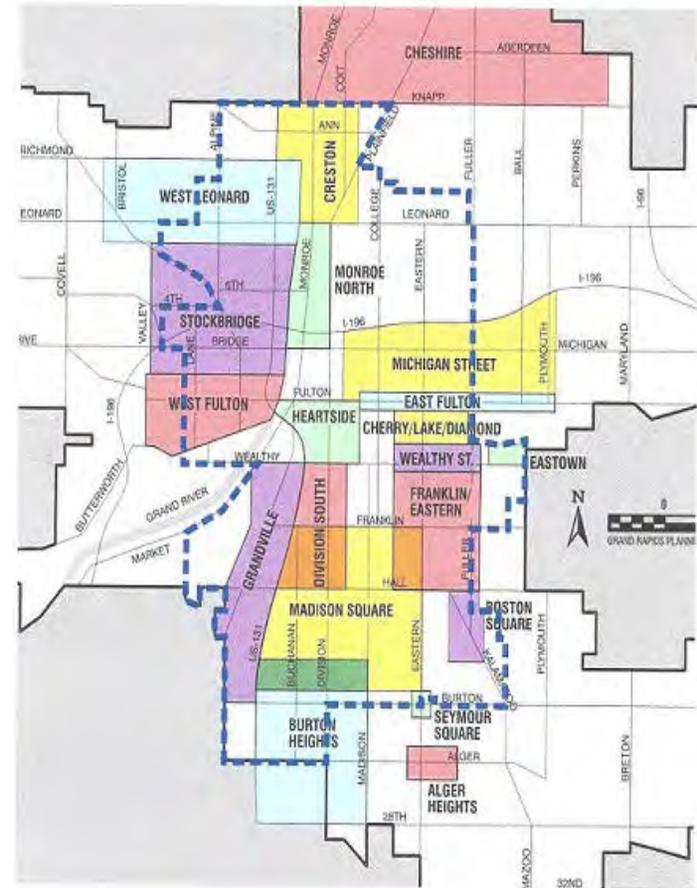
Source: City of Wyoming and McKenna Associates

**Grand Rapids.** In March 2015, Zimmerman/Volk completed an *Analysis of Residential Market Potential* of “Neighborhood Business Corridors” which included six areas of study in central Grand Rapids (see Map 4.3);<sup>4</sup> These areas are consistent with General Target Area (GTA) where the majority of the City’s CDBG funds are spent) and with the Neighborhood Business Corridors. This study identified the extent and characteristics of the potential market for new and existing housing units within the city and the Study Area using Zimmerman/Volk Associates’ proprietary target market methodology. Target market analysis establishes the market potential for new and existing housing based on the housing preferences and socio-economic characteristics of households in the relevant draw areas. The target market methodology was used to define realistic housing potential for these underutilized, fragile or emerging neighborhoods because it encompasses not only basic demographic characteristics, such as income qualification and age, but also less-frequently analyzed attributes such as mobility rates, lifestage, lifestyle patterns, and household compatibility issues.

This study determined that between 4,130 and 5,535 new market-rate rental and for-sale housing units could be absorbed within the Target Market Study Area over the next five years. An additional 1,575 to 2,080 new workforce/affordable housing units could be supported over the same time frame, for a combined annual total of between 5,705 and 7,615 new market-rate and workforce/affordable housing units absorbed in the Study Area over the next five years.

Of 8,500 new owners and renters potentially seeking housing each year in the Study Area, 2,025 households have incomes between 30 and 80 percent of the AMI. 1,120 of these households are potential renters of new affordable/workforce urban housing units,

**Map 4.3: Neighborhood Business Corridors**



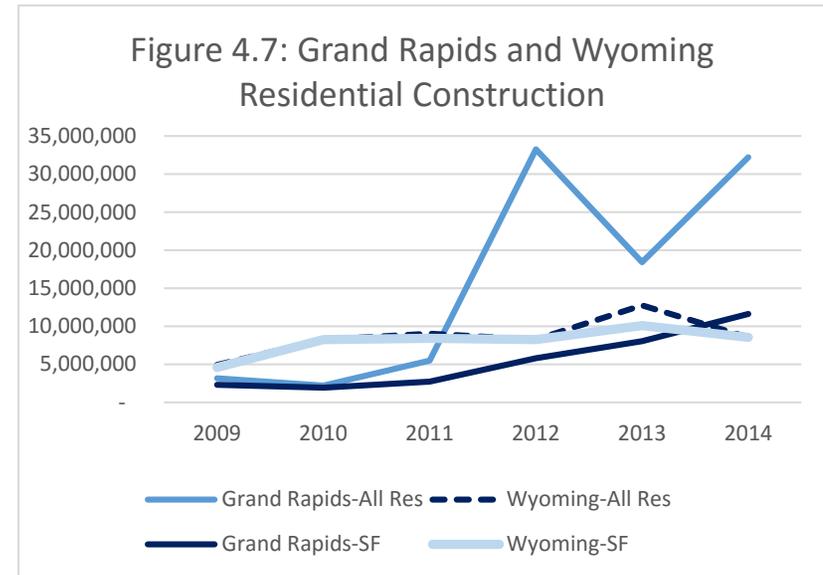
Source: City of Grand Rapids

<sup>4</sup> See *An Analysis of Residential Market Potential: The Target Market Study Area Neighborhood Business Corridors*, Zimmerman/Volk Associates, March 2015.

with the balance (895 households) being potential purchasers of condominium units, townhouse units, or single family homes. Based upon its absorption forecasts, the study projects an optimum production of 6,250 new housing units over the next 5 years, including:

- 968 affordable/workforce urban rental lofts and apartments;
- 207 affordable/workforce urban lofts/condominiums;
- 298 affordable urban row houses/townhouses and live-work units; and
- 277 new affordable/workforce urban single-family cottages and detached houses.

The City of Grand Rapids is taking active steps to increase the supply of affordable housing units. It is already implementing recommendations in the *Great Housing Strategies* developed by the community in the fall of 2015. These policy actions are described in greater detail in the section on Barriers to Affordable Housing below.



Source: 2009-2015 US Census Building Permits Database

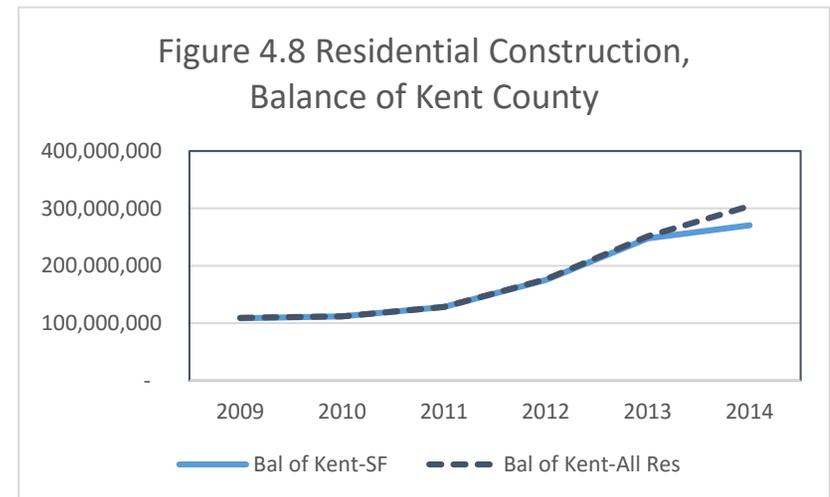
## Discussion

The supply of housing units in Kent County is rapidly expanding. Figure 4.7 illustrates the value of construction in Grand Rapids and Wyoming since 2009. While single-family construction has increased incrementally in both cities since 2010, the real growth in urban residential construction has been in rental units in Grand Rapids, where permits for nearly 400 multifamily units were issued since 2012.

However, the most dramatic increases in construction have been in the suburban areas of the county, with over \$300 million in residential building permits in 2014 – nearly 90 percent of all residential construction countywide as depicted in Figure 4.8.

Until 2013, nearly all of this construction activity was in single-family housing. However, in 2014, 280 units of multifamily housing were permitted outside of Grand Rapids.

A part of the solution to the shortage of affordable units will necessarily be a trickle-down softening of demand. This will come only when housing production in all price brackets begins to catch up with demand, creating more opportunities for housing choice. But a range of incentives will be required to motivate the development community to increase the supply of units that will be affordable to low-income households.



Source: 2009-2015 US Census Building Permits Database

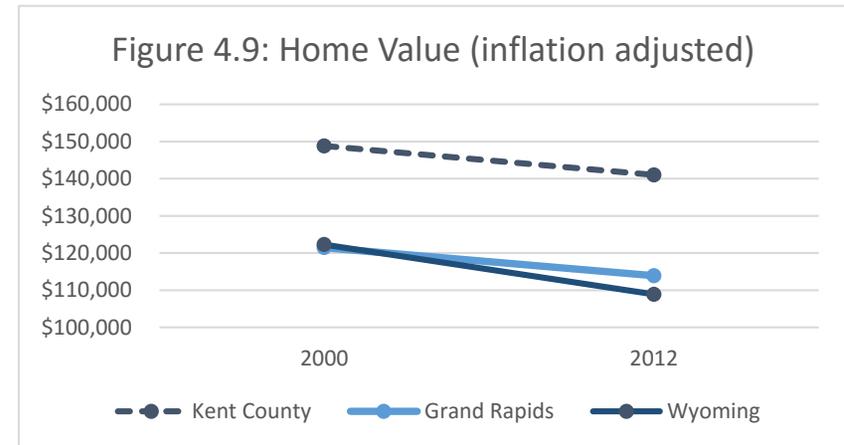
## HOUSING MARKET ANALYSIS: COST OF HOUSING - 91.210(A)

### Introduction

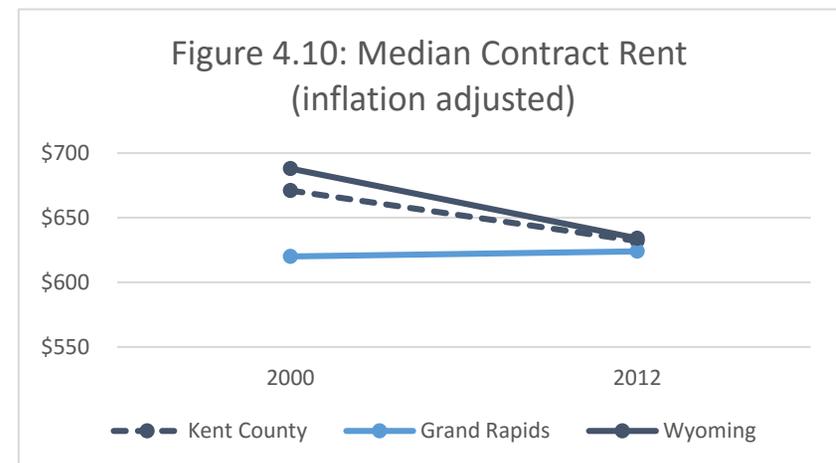
As of 2015, the cost of housing is rising rapidly throughout the region. During the housing crisis of the first decade of the 21<sup>st</sup> Century, the economic downturn resulted in increasing foreclosure and related loss of homes by owner-occupants; while this resulted in a marginal increase in the supply of rental housing, rental housing pressure was mitigated somewhat because of a general slacking of demand in a weak economy.

The 2000-2012 data in Figures 4.9 and 4.10 reflect this period, which included a dramatic softening of the market in the middle of the period, followed by a tepid recovery through 2012 resulting from decreases in rent and housing values when accounting for inflation (except for a slight increase in median rent in Grand Rapids).

Since 2012, however, the pace of this recovery has rapidly accelerated throughout the region. According to Zillow, median rents countywide have increased 41 percent in less than four years—from \$750 in November 2011 to \$1,062 in July 2015. Home prices have increased over 20 percent since 2012. These increasing costs have not slackened demand. Zillow reports that the for-sale inventory has decreased by 25 percent since 2012 countywide. And the rental vacancy rate in the Grand Rapids-Wyoming MSA for the second quarter of 2015 has declined to 1.4 percent—the lowest vacancy among the 75 largest metropolitan areas and a decline from 8.4 percent in the fall of 2013.



Source: 2008-2012 ACS



Source: 2008-2012 ACS

## Cost of Housing: Contract Rents

Table 4.2, which shows the number and percentage of rental units within each jurisdiction that are available at various rent levels, provides context for understanding rental demand and the affordable rental housing challenges in the region.

- These data are rendered without a unit size breakdown; as a result, use of these data also involves making a relevant inference; that is, the lowest rent units are typically efficiencies and 1-bedroom units. This inference is supported by comparing the data below with the “Unit Types by Tenure” tables in the previous section; in those tables, the typical rental unit is a 2-bedroom unit (2-bedroom units comprising 37-43 percent of all rental units in Grand Rapids, Wyoming, and the balance of Kent County). Similarly, in the tables below, 65-72 percent of rents in all jurisdictions are between \$500 and \$999/month; since rents vary primarily by number of bedrooms, we can infer that while this rent band will include units of all sizes, many of these units will be 2-bedroom units.
- Since the 2-bedroom fair market rent has ranged from \$730-\$750/month since 2010, and HUD rental assistance vouchers may typically be used only for units renting at or near this amount, households using a voucher had a reasonable prospect of finding a suitable 2-bedroom unit during 2012.
- However, as noted in the introduction above, since 2012, median rents have risen dramatically throughout the region. However, as noted above, HUD fair market rents have not increased. The result is an increasing scarcity of affordable rental units (i.e., units available at rents that are consistent with the rent limits of the Housing Choice Voucher program).

**Table 4.2: Contract Rent Breakdown**

Rent Paid	Kent County		Grand Rapids		Wyoming		Balance of Kent County	
	Number	%	Number	%	Number	%	Number	%
<b>Less than \$500</b>	13,359	20%	7,344	23%	1,593	17%	4,422	16%
<b>\$500-999</b>	46,531	69%	20,569	65%	6,506	71%	19,456	71%
<b>\$1,000-1,499</b>	4,174	6%	2,167	7%	465	5%	1,542	6%
<b>\$1,500-1,999</b>	1020	2%	447	1%	87	1%	486	2%
<b>\$2,000 or more</b>	537	1%	202	1%	114	1%	221	1%
<b>No Cash Rent</b>	2297	3%	859	3%	344	4%	1,094	4%
<b>Total</b>	67,918	100%	31,588	100%	9,109	100%	27,221	100%

Source: 2008-2012 ACS

### Housing Affordability

The figures below illustrate the number of “potentially affordable” units that are part of the overall housing inventory in each of the Consolidated Plan jurisdictions.<sup>5</sup> In each case, the total number of units from the Unit Size by Tenure tables above is used to show the proportion of units in the total inventory that are potentially affordable. When reviewing these data consider the following factors:

- The potentially affordable units listed on the table include units that would not be affordable under the definitions used elsewhere in this plan, including (a) rental units affordable to households between 60-80 percent of AMI, and (b) owner units between 80-100 percent of AMI.
- Few owner units are affordable to households under 30 percent of AMI, so the lack of data would not have a substantial impact on the overall proportions.

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<sup>5</sup> Note that the figure refers to “HUD Area Median Family Income” (HAMFI) rather than “AMI” used more typically. This is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents (FMRs) and income limits for HUD programs. HUD often uses HAMFI in the context of the CHAS and FMR calculation. The census definition of “family” includes only persons related by blood, marriage, or adoption. It thereby excludes single individuals living alone or in a household with other unrelated persons and is not the same as a “household.” For HUD rental programs, by contrast, the definition of “family” has been expanded over the years to include single persons and thus effectively includes all households. As a result, HAMFI and AMI are essentially synonymous.

- Rental units affordable between 80-100 percent of AMI, for which there is no data, are appropriately included in the “unaffordable” group.
- With only 14-24 percent of housing units affordable to households under 100 percent of AMI, homeownership is out of reach for many low and moderate income families.

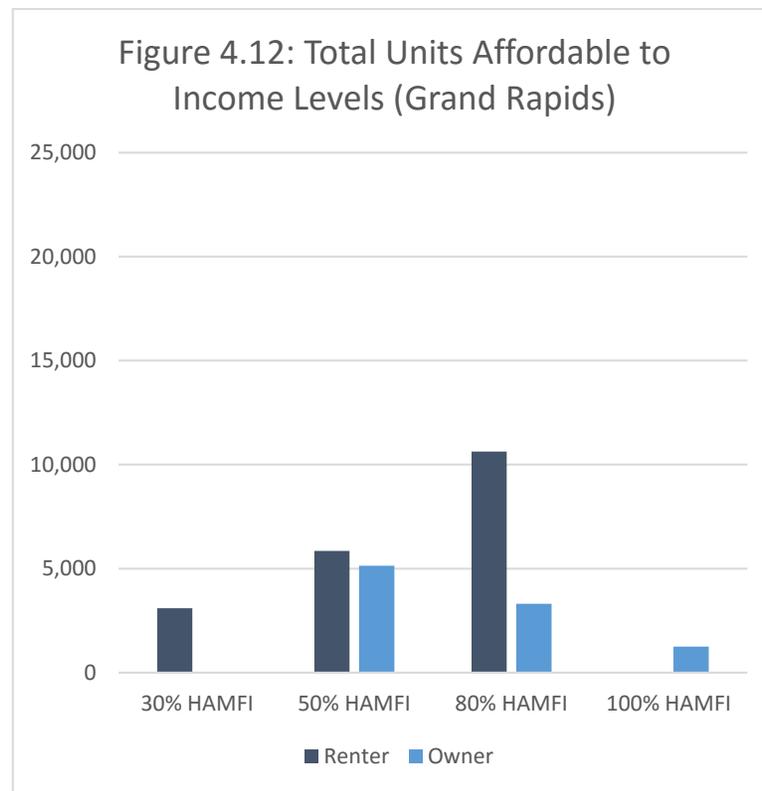
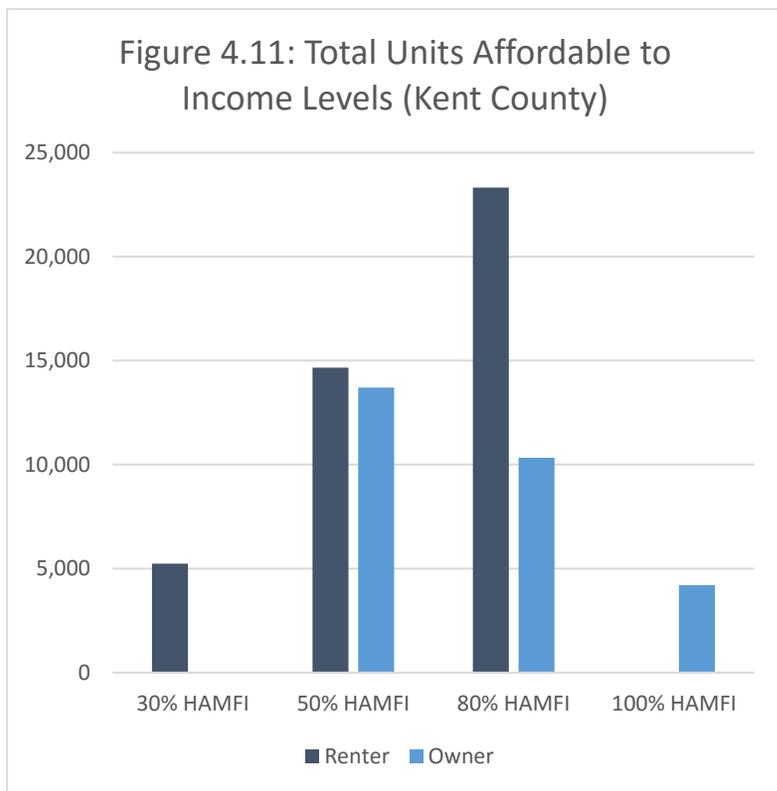


Figure 4.13: Total Units Affordable to Income Levels (Wyoming)

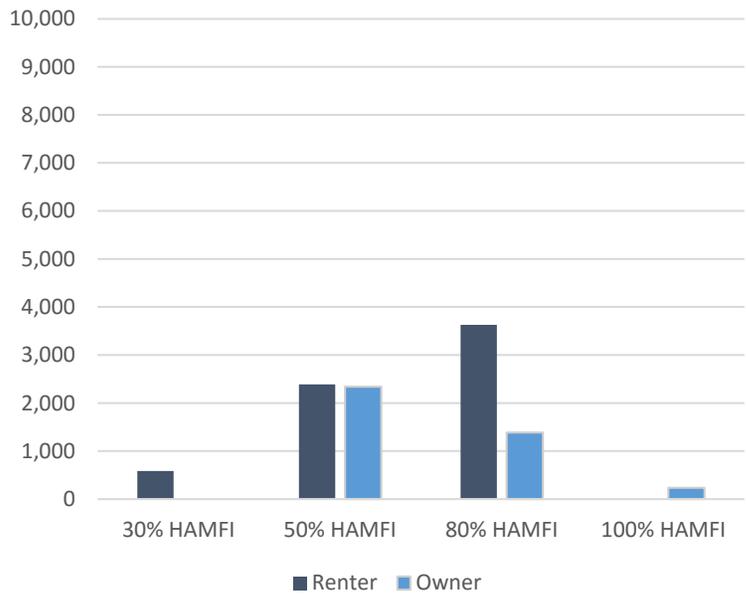
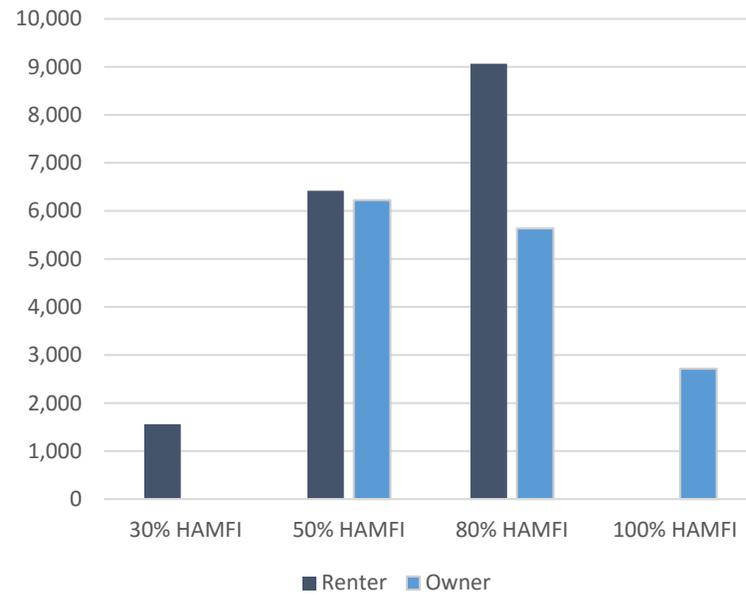


Figure 4.14: Total Units Affordable to Income Levels (Balance of Kent County)



Source: 2008-2012 CHAS (Figure 4.11 -4.14)

**Table 4.3: Share of Affordable Units**

	Kent County		Grand Rapids		Wyoming		Balance of Kent County	
	Renter	Owner	Renter	Owner	Renter	Owner	Renter	Owner
<b>Total Units</b>	67,918	160,286	31,588	41,197	9,109	18,156	27,221	100,933
<b>Units affordable to households earning less than 100% AMI</b>	43,220	28,240	19,570	9,705	6,605	3,960	1,7045	14,575
<b>Percent Affordable to households earning less than 100% AMI</b>	64%	18%	62%	24%	73%	22%	63%	14%

Source: 2008-2012 ACS

### Monthly Rent

Table 4.4 illustrates the 2015 HUD fair market rents for rental housing, as well as the allowable high and low HOME rents. These rents are the upper limits of rents that can be charged by property owners with units assisted by HUD rental housing programs. As noted elsewhere, rapidly increasing rents in the countywide market have widened the gap between HUD FMRs and market rents, creating problems for low-income households seeking units that will accept their HUD voucher for rent assistance.

**Table 4.4: HUD Monthly Rents**

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
<b>Fair Market Rent</b>	519	588	737	1,028	1,157
<b>High HOME Rent</b>	520	590	737	1,028	1,157
<b>Low HOME Rent</b>	520	590	720	832	928

Source: 2015 HUD FMR and HOME Rents

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### Is there sufficient housing for households at all income levels?

County population is expected to grow from 608,453 in 2011 to an estimated 620,699 by 2015.<sup>6F</sup> Between July 2013 and 2014, Kent County population grew by 6,841, the largest population increase in Michigan during that year.<sup>7F</sup> This increase in demand is creating pressure on the housing inventory, driving up prices and rents in all price categories. In addition, the senior population (age 60+) increased by 32 percent from 77,057 in 2000 to 101,386 in 2010,<sup>8F</sup> suggesting a need to expand the supply of housing appropriate for the needs of seniors.

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

Job growth in West Michigan continues, with the Grand Rapids-Wyoming area adding 3,000 jobs in the year ending November 2014, a 7.6 percent annual growth rate.<sup>9</sup> The unemployment rate, at 3.3 percent in Kent County in April 2015,<sup>10</sup> is among the lowest in the state. In June 2015, *Area Development* published a study of the nation's MSAs cited by *The Right Place*; Grand Rapids was behind only Denver and Houston in regional economic growth. Absent unpredictable and severe external economic shifts, this economic expansion will likely continue to fuel overall population growth in Kent County, which in turn will continue to raise home values and rents without substantial expansion of housing supply.

The housing affordability problem for low-income households is further intensified because income growth is not keeping pace with job growth. The same MiBiz.com report cited above noted that wages in the Grand Rapids-Wyoming MSA have fallen 4 percent from 2010 to 2013, despite job growth increasing 14 percent.<sup>11</sup> From a longer term perspective, Kent County median household income increased less than 1 percent per year from in 1999 (\$45,980) to 2013 (\$51,992).

In the *Area Development* study, Grand Rapids rated lower in 5-year income growth than in any other metric, at #178 of 373 MSAs.

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<sup>6</sup> <https://www.accesskent.com/about.htm>

<sup>7</sup> mlive.com, [http://www.mlive.com/lansing-news/index.ssf/2015/03/census\\_data\\_has\\_your\\_county\\_ga.html](http://www.mlive.com/lansing-news/index.ssf/2015/03/census_data_has_your_county_ga.html)

<sup>8</sup> Area Agency on Aging of Western Michigan, <http://www.feedingamericawestmichigan.org/wp-content/uploads/2014/04/2012-Kent-County-Data-Toolkit-AAAWM.pdf>

<sup>9</sup> mlive.com, [http://www.mlive.com/business/west-michigan/index.ssf/2014/12/post\\_130.html](http://www.mlive.com/business/west-michigan/index.ssf/2014/12/post_130.html)

<sup>10</sup> mlive.com, [http://www.mlive.com/business/west-michigan/index.ssf/2015/05/west\\_michigan\\_led\\_state\\_in\\_job.html](http://www.mlive.com/business/west-michigan/index.ssf/2015/05/west_michigan_led_state_in_job.html)

<sup>11</sup> <http://mibiz.com/item/22054-report-grand-rapids-anchors-economic-growth-in-west-and-central-michigan#sthash.eWVWwGig.6LwuTqew.dpuf>.

In May 2015, the Center for Michigan noted that West Michigan's jobs growth is not matched to high wages. Kent County averaged \$837 in weekly wages in September 2014, according to the Bureau of Labor Statistics; while Ottawa County averaged \$801 — both below the state average of \$888. Washtenaw and Oakland counties were tied at the top with an average weekly wage of \$1,019, with Wayne County at \$1,018. By comparison, U.S. wages average \$941. George Erickcek, economic analyst for the Kalamazoo-based Upjohn Institute for Employment Research, notes that West Michigan's lower wages are due, in part, to being less heavily unionized than Southeast Michigan's historically higher-paying automotive jobs. As a result, wages in West Michigan have been slower to increase.<sup>12</sup>

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**How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

Service providers and public housing agencies report that the actual rents being charged in the market are substantially outpacing HUD-established fair market rents (FMRs). Since the HUD FMR is the chief factor in determining the rent standard paid to landlords in the Housing Choice Voucher (HCV) program, housing rented at higher than the FMR becomes effectively unavailable to persons with HUD rent assistance.

HUD FMRs have remained consistently between \$730 and \$750 per month for a 2-bedroom apartment since 2010. Since median rents countywide have risen by 20 percent since 2012, the task of finding property managers that will accept a voucher is a growing challenge. Although the Grand Rapids Housing Commission is still reporting full utilization of vouchers, in September 2015 they reported only 8 units vacant and available countywide for users of their 4,000 vouchers. While the proposed FMR for 2016 increases to \$767 for a 2-bedroom unit, this may do little to motivate property owners and managers to once again accept rental assistance vouchers to ease the scarcity of participating units. As a result, assisted households must often take housing which is marginally suitable to their needs and/or remote from employment and/or job opportunities.

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<sup>12</sup> <http://bridgemi.com/2015/05/jobs-flooding-to-west-michigan-though-wages-still-lag/>

## HOUSING MARKET ANALYSIS: CONDITION OF HOUSING – 91.210(A)

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### 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**

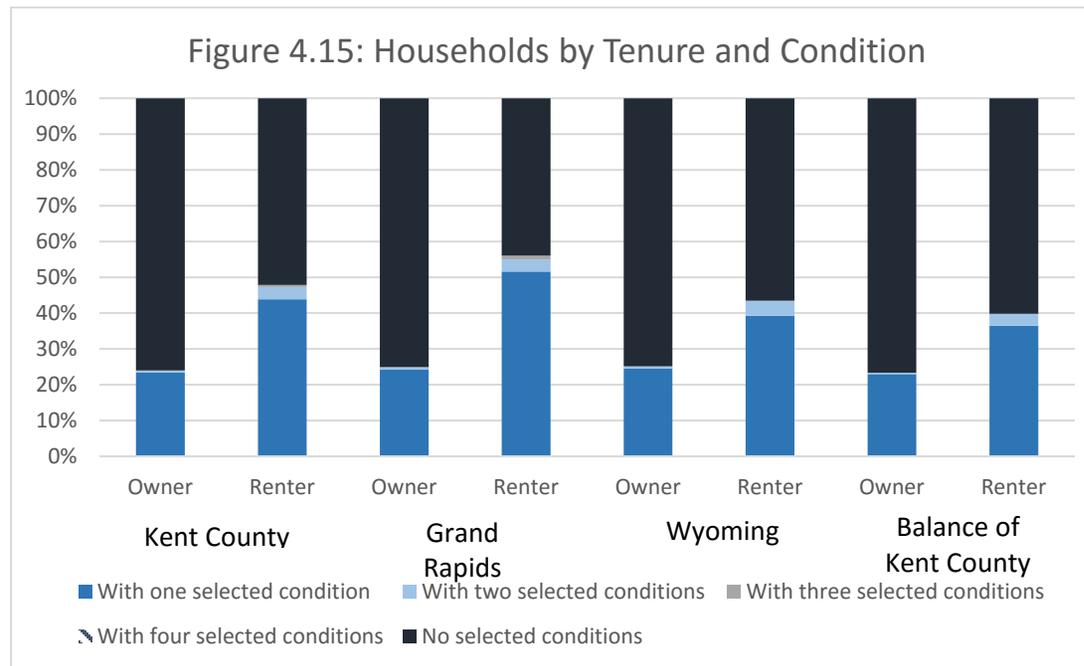
A substandard housing unit is considered suitable for repair if the estimated cost of repair is less than double the assessed value of the structure, excluding the value of the land.

## Condition of Units

Figure 4.15 below indicates the share of households (by tenure) experiencing at least one condition. Conditions include:

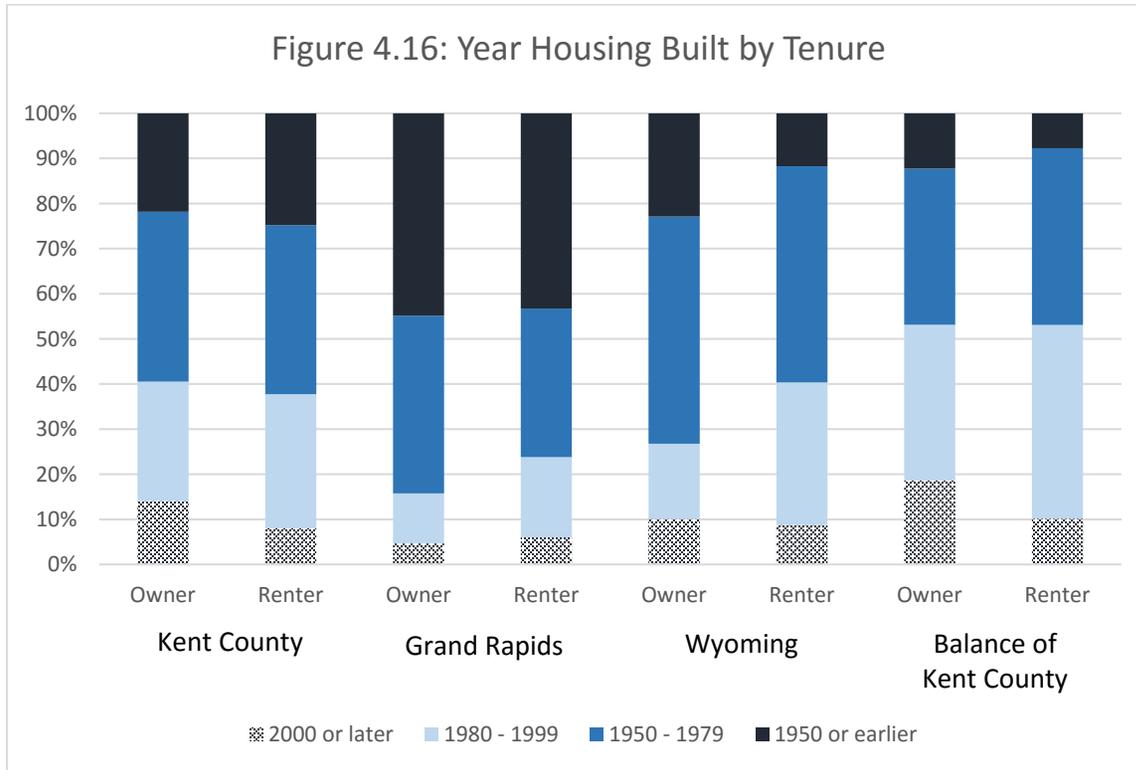
- Lacking complete plumbing facilities
- Lacking complete kitchen facilities
- Overcrowding (more than 1 person/room)
- Cost-burden of at least 30 percent

As indicated in the data, more renters than owners experience at least one housing condition. As discussed in the Needs Assessment, the most prevalent housing condition is housing cost-burden for both renter and owner-occupied households in all jurisdictions.



Source: 2008 – 2012 ACS

Figure 4.16 below shows the distribution, by year built, of housing within the jurisdictions, as well as for Kent County as a whole. The figure illustrates the historic growth and development of Kent County, with Grand Rapids largely built out prior to 1950 (44 percent of its housing stock), Wyoming built out during the post-war period (with 37 percent of its housing built from 1950-1979), and the balance of Kent County developed last (with 53 percent of its housing built in 1980 or after).



Source: 2008 – 2012 ACS

## Need for Owner and Rental Rehabilitation

Economic recovery has led to increased investment in residential construction, with over \$290 million invested in construction of over 1,200 single family units in 2014 countywide. However, this construction boom, representing an increase of about 150 percent over 2009 does not necessarily indicate an increased ability of low-income homeowners to invest in their homes.

Several factors are impacting the investment in home improvement by owner-occupants, including loss of equity (and often the loss of confidence by owners) and the continuing reticence of lenders. In addition, slow income growth may be hampering the ability of homebuyers to leverage the value of homes into rehabilitation improvements. Kent County median household income in 2013 was \$51,992, up only 13 percent from \$45,980 in 1999, an annual increase of less than 1 percent per year.

Low-income homeowners continue to find themselves unable to invest in needed home improvements. However, the older neighborhoods of Grand Rapids and Kent County, solidly built and advantaged by walkable locations, are in increasing demand in today’s market. The need for owner and rental rehabilitation is compounded by the needs of housing built pre-1980 – indicating a potential need for rehab related activities, including energy-efficiency upgrades, accessibility modifications, and lead hazard remediation.

Participants in the Wyoming focus group noted that Wyoming’s housing stock was built between 1940 and 1970 to respond to booming housing demand after World War II. By today’s standard, homes are typically small and present a unique range of home improvement needs: some homes need to be enlarged and updated to attract owner-occupants; others have converted a portion of the basement into sleeping areas and need safe fire egress; many homes need upgrades to be more energy efficient. In addition, participants in the Kent County focus group noted that many rural homes need septic improvements or replacement.

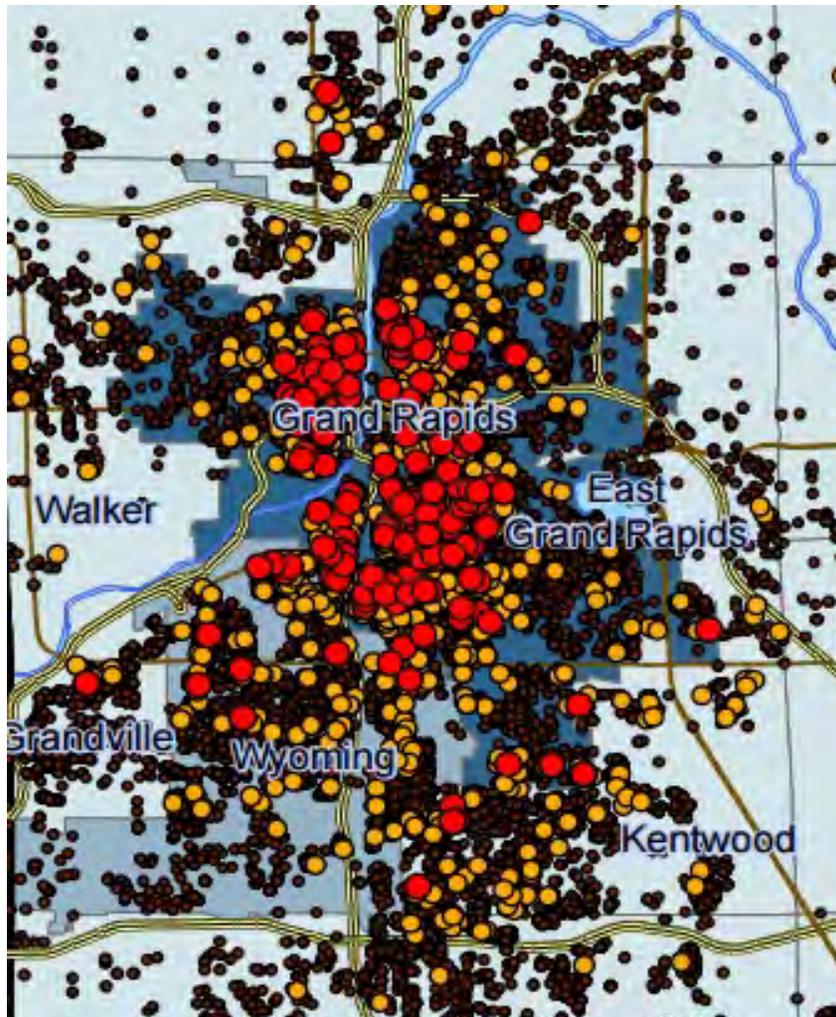
**Table 4.5: Risk of Lead-Based Paint Hazard in Kent County**

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
<b>Total Number of Units Built Before 1980</b>	95,326	59%	42,278	62%
<b>Housing Units build before 1980 with children present</b>	15,045	16%	8,865	21%

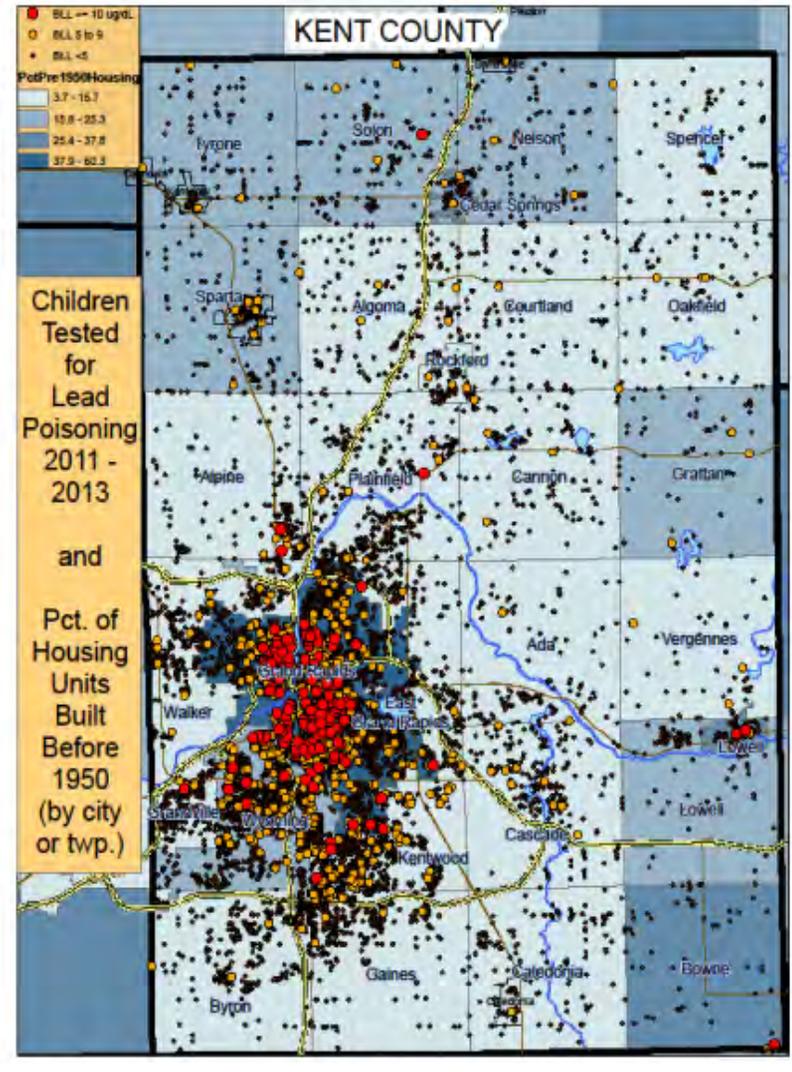
Source: 2008-2012 ACS

**Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

Approximately 45 percent of the housing in Grand Rapids was built before 1949 (33,000 units) and an additional 36 percent of the housing units were built before 1980 (27,000 units). Since lead was



**Maps 4.4 and 4.5: Children Tested for Lead Poisoning**



Source: Healthy Homes Coalition/Get the Lead Out, 9/15

often a component of house paint until 1978, addressing potential lead hazards in these 60,000 units (which comprise over 80 percent of the city's housing stock) is an important public health strategy. As a result, the City of Grand Rapids places a high priority on the reduction of lead paint hazards in homes occupied by low and moderate income households. The City of Grand Rapids estimates that at least 20,000 low and moderate income households occupy units that are potentially impacted by lead paint. Ongoing testing by the Michigan Department of Health and Human Services suggests that there appears to be a high concentration of the homes with lead poisoned children in the 49507 zip code and probably in northeast Wyoming as well.

The Kent County Health Department reports that 59.2 percent of the homes in Kent County were built before 1978. Of over 8,000 households under 80 percent of AMI in the county with children under 6, about 4,800 households live in these older homes. It is not known exactly how many of these homes have been remediated, either through lead hazard reduction programs or the independent efforts of owners and families, but continuing activities targeted at housing occupied by low-income households with young children will build on the substantial positive results of past efforts, as presented in the Discussion section that follows.

Kent County is among the leaders in the State of Michigan, testing over 80 percent of 1- and 2-year olds insured by Medicaid for lead in 2013.<sup>13</sup> Maps 4.4 and 4.5 display the 2011 – 2013 results of lead testing of children under the age of six. It is overlaid on a map that identifies by city and township the percentage of housing stock built before 1980 and, as a result, more likely to present lead paint hazards to occupants.

To assist families in identifying lead-safe housing, the State of Michigan maintains a registry of lead-safe homes at <http://lshr.state.mi.us:8888/Registry/lshr.jsp>.

The City of Grand Rapids registry is at [http://grcity.us/community-development/Documents/LS%20Housing%20Registry%2001\\_13\\_15.pdf](http://grcity.us/community-development/Documents/LS%20Housing%20Registry%2001_13_15.pdf).

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## Discussion

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<sup>13</sup> 2013 Data Report on Childhood Lead Testing and Elevated Levels, Childhood Lead Testing Prevention Program

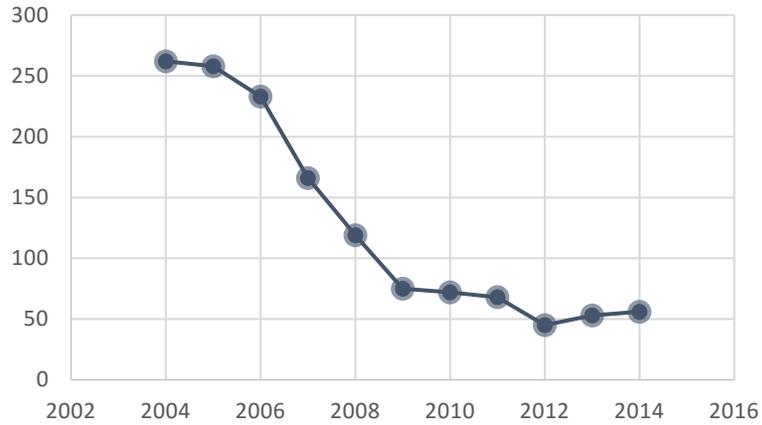
The City of Grand Rapids has worked proactively for a number of years to reduce lead hazards in its housing stock. Grand Rapids and Kent County are partners in the countywide Healthy Homes Coalition “Get the Lead Out!” Initiative.<sup>14F14</sup> The initiative has 3 major objectives: (1) Outreach and education related to the City’s grant-funded Lead Hazard Control program (e.g., presentations at Head Start sites, educating parents about lead hazards and helping people apply for the program), (2) Direct services (e.g. helping homeowners assess property hazards, learning how to minimize exposure to hazards, and helping find resources to eliminate hazards), and (3) education for parents and professionals (e.g., nurses, code enforcement, etc.). The Initiative provides public awareness information on its website at <http://gettheleadoutgr.org/for-media>.

This partnership began in 2001, and as of 2015 has secured \$16 million in new federal funding, supplemented with \$9.7 million in local match to address lead hazards in 1,500 homes. Substantial reductions in the number of Kent County children with elevated lead blood levels are shown in the figures below that illustrate the decreases in lead poisoning in children under 6 with lead blood levels below 10 (the reference level prior to 2013) and below 5 (since 2013) micrograms/deciliter.

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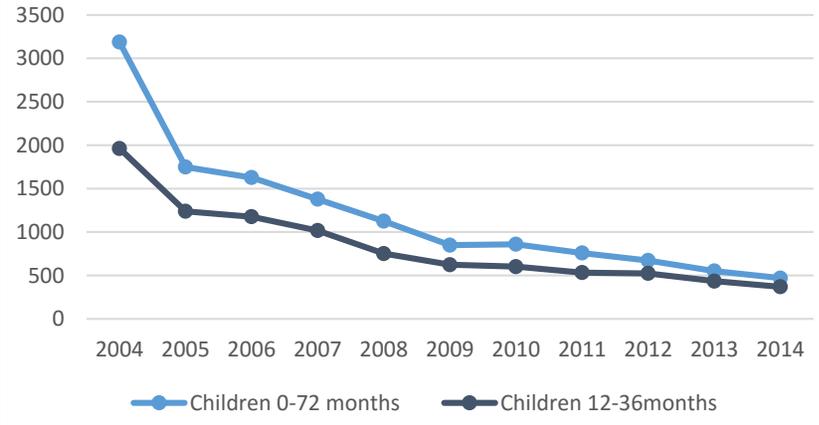
<sup>14</sup> See <http://grcity.us/community-development/Pages/Get-the-Lead-Out!.aspx>

Figure 4.17: Kent County Children, 0-72 months, with confirmed EBL's of >10 µg/dL)



Source: Community Wellness Division, Kent County Health Department, 9/2015

Figure 4.18: Kent County Children with EBL Tests (>5 µg/dL)



Source: Community Wellness Division, Kent County Health Department, 9/2015

## **PUBLIC AND ASSISTED HOUSING – 91.210(B)**

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### **Introduction**

Kent County is served by four Public Housing Authorities (PHAs):

- Grand Rapids Housing Commission
- Wyoming Housing Commission
- Kent County Housing Commission
- Rockford Housing Commission

Table 4.6 below presents the number of units provided by these PHAs.

**Table 4.6: Totals Number of Units**

	Program Type							
	Mod-Rehab	Public Housing	Vouchers					
			Total	Project-Based	Tenant-Based	Special Voucher Program		
Veterans Affairs Supportive Housing	Family Unification Program	Disabled *						
<b># of Units/Vouchers Available</b>								
<b>Grand Rapids Housing Commission</b>								
Section 8 HCV (Tenant and Project Based)			3,290	521	2,769			
Low Income Public Housing		324						
Section 8 New Construction		153						
Mod Rehab Certificates	102							
Homeless Certificates (Disabled)			53					53
<b>Grand Rapids Housing Commission Total</b>	<b>102</b>	<b>477</b>	<b>3,343</b>	<b>521</b>	<b>2,769</b>			<b>53</b>
<b>Kent County Housing Commission</b>			508		180	153	175	
<b>Wyoming Housing Commission</b>		196	1,122		1,122			
<b>Rockford Housing Commission</b>		52	63		63			
<b>Total</b>	<b>102</b>	<b>725</b>	<b>5,036</b>	<b>521</b>	<b>4,134</b>	<b>153</b>	<b>175</b>	<b>53</b>
<b># of Accessible Units</b>								
<b>Grand Rapids Housing Commission</b>	4	27	23	23	*	*	*	*
<b>Wyoming Housing Commission</b>		9			*	*	*	*
<b>Total</b>	<b>4</b>	<b>36</b>	<b>23</b>	<b>23</b>	<b>*</b>	<b>*</b>	<b>*</b>	<b>*</b>

\*Number of accessible units cannot be determined for tenant-based vouchers, which are not tied to a specific unit

Sources: Local housing commissions and HUD Public and Indian Housing Information Center Data

**Describe the supply of public housing developments:**

The supply of public housing units across the four public housing authorities in Kent County is presented in the table above. Kent County programs include VASH and Family Unification vouchers but no public housing units. Among them, Grand Rapids, Wyoming and Rockford own 725 public housing units, including 36 accessible units.

**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:**

Rockford: One PHA building (Rogue Valley Towers) that provides 53 units for elderly and disabled residents, built in 1978. It has been rehabilitated and received an inspection score of 98 percent.

Grand Rapids: The Grand Rapids Housing Commission (GRHC) has evaluated all its units as Excellent or Good, except 44 scattered site units built in 1989, which are listed as Fair. Projects built between 1969 and 1992 have been periodically rehabbed and are rated Good or Excellent. Other projects were built between 2005 and 2015 and are in excellent condition.

Wyoming: 195 units, built between 1975 and 1983.

**Public Housing Condition**

**Table 4.7: Public Housing Condition**

Public Housing Development	Average Inspection Score
Rogue Valley Towers-RHC	98%

Source: PIC (PIH Information Center)

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

Rockford has done extensive Capital improvements through the Capital Fund Programs. At this time there is not a critical need for improvements on the Public Housing level. If the Rockford Housing Commission public housing building were to make additional Capital improvements, it would be on an energy efficient level, heating units, and new windows.

Grand Rapids has continued rehabilitation efforts on its buildings and has an assessment of capital improvement needs currently underway.

Wyoming's efforts to modify units for handicapped accessibility was deferred to replace boilers and make other critical capital repairs.

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

**Kent County:** Kent County continues to educate its current Landlords on the PHA's program and giving them the motivation and support to maintain units with the Housing Commission. The Housing Commission advocates for clients to Property Management companies that have discontinued or are discontinuing to honor Section 8 vouchers in Kent County.

Efforts include partnerships through its Community Partner agencies that provide training in homeownership, life skills, financial and economic management. Kent County also provides direct case management to assist Section 8 clients by offering opportunities through the Family Self-Sufficiency Program to transition into the Homeownership program.

**Grand Rapids:** The GRHC uses a multi-pronged approach to improving the living environment for residents and clients. The first consideration is the condition of the unit in which they live. Staff uses HUD standards to maintain its property and property under contract for Section 8. Additionally, annual inspections are conducted by several entities including MSHDA, Great Lakes Capital Fund, and the City of Grand Rapids to secure Certificates of Compliance and Continued Occupancy. The second consideration is to enable the elderly to age-in-place, the disabled to live independently, and families to become economically self-sufficient. This is accomplished using case management and main-stream services for the specific populations that are served. Service plans are developed with client input, community feedback, and the recommendations of Masters level social workers employed at the specific housing developments.

**Wyoming:** Wyoming Housing Commission (WHC) considers different strategies to improve its properties, which include the following studies, inspections etc. that provide WHC with insight of property needs:

In 2014, WHC had a Green Physical Needs Assessment (GPNA) & Energy Audit study. This study was conducted and included all community, administrative, and maintenance buildings as outlined by HUD. This consisted of a physical inspection of over 10 percent

of WHC dwelling units, representing typical unit types in typical buildings in all housing developments listed in the RFP, including 100 percent of the non-dwelling structures (maintenance, office and community buildings). This study assists WHC in considering areas that will improve residents' environment. The report provides recommendations to approach energy conservation and green measures, accessibility needs, marketability/livability needs, priority of work, cost and expected useful life of physical needs components.

Uniform Physical Condition Standards (UPCS) Inspection: WHC contracts out an annual inspection of all units. The inspection report is used to identify any deficiencies and improve the quality of units. Once a year WHC connects with residents to discuss its annual plan and the residents provide input on needs of WHC properties.

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**Discussion:**

Public housing authorities in Kent County continue struggling to find units for voucher holders; units are generally unavailable for HUD fair market rents. Strategies could include:

- Outreach to and engagement with landlords to encourage acceptance of HCVs;
- Offer of project-based vouchers to developers of tax credit or other subsidized housing in locations with walkable connections to jobs, services and amenities;
- Other strategies to incrementally increase supply, such as HCV homeownership vouchers for appropriate households.

## HOMELESS FACILITIES AND SERVICES – 91.210(c)

### Introduction

Homeless Facilities and Services are managed and provided through the Continuum of Care agencies and Special Needs Services agencies (listed in Appendix B).

These agencies provide several types of housing including:

- Emergency Shelter for families, mixed populations, adult individuals, and youth
- Transitional Housing for families, mixed populations, and adult individuals
- Permanent Supportive Housing for adult individuals
- Rapid Re-Housing for families and adult individuals

**Table 4.8: Facilities and Housing Targeted to Homeless Households**

	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
<b>Households with Adult(s) and Child(ren)</b>	116	5	383	465	**
<b>Households with Only Adults</b>	298	67	136	419	**
<b>Chronically Homeless Households</b>	N/A	0	0	329	**
<b>Veterans</b>	18	0	30	21	**
<b>Unaccompanied Youth</b>	15	0	3	0	**

\*Source: HUD's 2015 CoC HIC Report for Grand Rapids/Wyoming/Kent County

\*\* Data unavailable

**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.**

Mental health services are coordinated in the community through network180, the community mental health organization. Housing projects have worked in partnership with network180 to secure support services for project participants and to minimize housing funds to services wherever possible. Cherry Health Services is the Federally Qualified Health Center and centrally located in the City of Grand Rapids, near many of the single site permanent supportive housing projects. Employment service providers collaborate as a sub-committee of the Essential Needs Task Force (ENTF), as does the housing Continuum of Care. This shared taskforce helps to ensure connection of employment services to housing projects.

Supportive services are provided through several agencies throughout the county (as listed in the Special Needs Services Agencies list in Appendix B).

**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. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

The 2014 Housing Inventory Count which lists the facilities and housing units dedicated to homeless persons is located at:

[https://www.hudexchange.info/resource/reportmanagement/published/CoC\\_HIC\\_CoC\\_MI-506-2014\\_MI\\_2014.pdf](https://www.hudexchange.info/resource/reportmanagement/published/CoC_HIC_CoC_MI-506-2014_MI_2014.pdf)

The Kent County Continuum of Care has identified 43 projects within the community with a total of 1,794 beds with which to serve people experiencing homelessness. Of these, 277 beds were dedicated to chronic homelessness, 44 beds for veterans and 18 beds for youth under 18. There are an additional 68 seasonal and 32 overflow beds. Beyond these projects, there are supportive services available from other providers within the community.

In addition, a count of assisted housing developments and units has identified an inventory of permanent supportive housing (PSH) units in Kent County at 623 units at 21 projects. In addition, Community Rebuilders provides approximately 267 units through vouchers not tied to a specific property, raising the total PSH units to 890.

## SPECIAL NEEDS FACILITIES AND SERVICES – 91.210(D)

### Introduction

Kent County and the cities of Grand Rapids and Wyoming work closely with the Continuum of Care to meet the needs of special needs persons in the community through the provision of housing options and supportive services.

**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.**

During the Regional Homeless Focus Group, participating service providers indicated that there is a high need for mental health and substance abuse services. There is also a high demand and need for expanded permanent supportive housing services for those exiting emergency or transitional housing.

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

Discharge planning is included as a part of the Continuum’s 2015-2017 Action Plan to End Homelessness. In Performance Measure 1 – “Reduce the number of people who experience homelessness,” it lists “work with other systems to prevent homelessness.”

- Includes working with Prisoner Reentry Service Providers to increase access to permanent supportive housing
- Includes reducing homelessness for those exiting foster care
- Includes making housing plan assistance training available to discharge planners across 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.**

To be determined during Action Plan process.

**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))**

To be determined during Action Plan process.

## **BARRIERS TO AFFORDABLE HOUSING – 91.210(E)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

(Describe the negative effects of public policies on affordable housing 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.)

#### **Region**

- As noted by focus group participants, routes and hours of bus service make it hard to reach some employers, especially on the 2<sup>nd</sup> and 3<sup>rd</sup> shift.
- Unprecedented low vacancy is severely restricting housing choice. This market factor is not caused by public policy, but absent a substantial turn-down in the macro economy, it is likely to continue, suggesting a need for policy makers to consider new strategies to preserve housing choice in a changing environment.

#### **Kent County**

The Kent County Analysis of Impediments to Fair Housing notes that barriers to new housing development over which the county has little to no control include:

- Allowable densities and location of multiple family units
- Minimum lot and building sizes, which can affect price and rent
- Location of grocery stores and other essential services

Zoning and land use related decisions such as those noted above are controlled at the local level, as opposed to the county level. That being said, the County can play a role in promoting and advocating for local zoning and land use decisions that favor greater housing choice.

The AI notes that barriers to the development and provision of affordable housing as they apply specifically to Kent County can generally be separated into six categories as follows:

1. Economic (poor credit; housing costs; and lost value)
2. Local Policies (lack of source of income regulations in all but 3 communities; local zoning decisions/land use policies; failure to equitably accept housing vouchers and higher density residential development)
3. Regional/National Policies (lack of resources to address high cost of lead paint hazard abatement; prevailing wage and associated costs)
4. Need for increased access (lack of public transportation linkage to out-county areas; concentration of services in Grand Rapids, isolated from growing demand in out-county areas)
5. Need for Fair Housing Education and Training (foreclosures bring about uneducated new investors; internet marketing lacks controls to ensure fair housing choice; NIMBYism is still a problem that will likely increase as the market rebounds and demand for new single-family housing rises; discrimination is often unintentional or unknown; steering by Realtors based on perceptions of communities and/or school districts)
6. Discriminatory Lending Practices in Financing and Lending (2006 and 2009 HMDA data demonstrate disparities in lending)

Strategies to address these barriers were summarized as follows:

- 1. Continue to work with an organization or agency to provide fair housing services to the county.**
  - a. The county has the opportunity through contracts with local partners and providers to address impediments to fair housing in Kent County based on needs identified in the prior year.
  - b. Based on the declining number of housing test cases in recent years, determine if additional funding is available and should be targeted to increase housing testing, realizing that fair housing regulations are only as good as the enforcement thereof.
  - c. Work with the agency or organization to include religion and age discrimination in information programming to ensure that discrimination is identified, not tolerated, and properly addressed regardless of type.
  - d. Work with a partner agency or agencies to expand enforcement of fair housing choice into rural areas, where such issues often go unnoticed.
- 2. Research whether a countywide Fair Housing Ordinance would be an effective tool to increase fair housing outcomes in Kent County.**

- a. While other counties have successfully adopted fair housing ordinances, it is not a one-size-fits-all solution. Kent County may benefit from such an ordinance, but extensive background research would be required to estimate the feasibility of such an effort.
- 3. Promote Increased Public Transportation Access and Access to Job Training activities throughout the county.**
- a. Continue participation with The Rapid’s Transit Master Plan to promote and actively participate in review of existing transportation routes to link transportation and job employment centers to where lower-income persons and families reside.
  - b. Increase capacity of fair housing providers and organizations in rural areas to promote access to resources in areas where mobility and transportation are limited.
  - c. Coordinate with local and regional planning efforts to develop efficient transportation systems and allocation of housing and land uses.
  - d. Advocate for additional adult education and vocational training opportunities, including non-English speaking alternatives.
- 4. Create a Fair Housing Web Page on the Accesskent.com to increase access to fair housing resources.**
- a. Include copies of all fair housing resources currently distributed to program participants in the Housing Choice Voucher program (tenants and property owners).
  - b. Include links to other relevant Fair Housing information sites.
  - c. Provide model language to municipalities and townships to assist in implementing Housing Plan elements.
- 5. Promote county-wide Source of Income Protection.**
- a. Explore establishment of source of income protection throughout the county.
  - b. Promote broader acceptance of vouchers and development of affordable housing county-wide through public information on the facts about Housing Choice Vouchers and their purpose.
  - c. Attend at least one meeting of the Regional Property Managers Association annually to provide information about Housing Choice Vouchers and provide a point of reference for property owners who may or may not be participating in the program.
- 6. Cooperate with public/private institutions to provide better access to aid and financing through continued participation in local task forces.**
- a. Facilitate tracking and enforcement of financing disparities by downloading annual HMDA data.

- b. Seek Spanish speaking fair housing educators to address changing demographics and assist with all aspects of home ownership/rental requirements.
- 7. Further explore the reasonableness of rental registration and development of a landlord training program.**
  - a. While rental registration can be a tool for improving housing conditions, the implementation of such a program can have unintended side effects on low-income residents and non-profit housing providers. Carefully identify the objectives of rental registration and potential impacts of implementation.
  - b. Promote increased fair housing training programs and education for landlords – particularly new landlords.
- 8. Continue to support housing inspection efforts of the Health Department and housing rehabilitation for units identified through housing inspection activities.**
  - a. Provide rehabilitation programs, particularly to elderly residents who are unable to perform basic maintenance and upkeep.
  - b. Continue to receive referrals from the Health Department for homeowners needing assistance with housing-related health and safety violations.
  - c. Support local units of government in requiring that bank-owned properties are adequately maintained to ensure safety of surrounding neighborhoods.
  - d. Ensure that minimum accessibility standards are being adhered to through strict enforcement of building codes.
- 9. Continue to support affordable housing opportunities through the HOME Investment Partnership program – particularly in communities seeking to provide eligible projects that meet a diverse range of housing needs.**
  - a. Incorporate visitability standards into Kent County HOME program’s guidelines for new construction over the next year to increase visitable units.
  - b. Identify public-private partnerships to implement housing choice strategies – housing rehabilitation services, financial institutions, etc.

## **Grand Rapids**

Grand Rapids is taking steps to create a greater range of housing choice for low-income households, including housing more likely to be located near jobs and services. Through the community consultations, the Grand Rapids *Great Housing Strategies Addressing Current and Future Housing Needs* initiative has identified existing and proposed initiatives to create these opportunities.

Four workgroups convened during a two month process where members were charged with identifying desired housing outcomes; examining existing and potential housing policies, programs and tools; and developing recommendations and a plan of action to achieve outcomes.

Workgroup members had a diversity of backgrounds that enhanced discussion on the complex issues surrounding housing challenges. Members primarily represented for-profit and non-profit housing developers, neighborhoods, community advocacy groups, foundations, non-profit organizations, human service agencies, college and lending institutions, government agencies, and some businesses. Planned actions were framed around the following goals:

- 1) Provide a variety of housing choices
- 2) Encourage mixed-income neighborhoods
- 3) Create and preserve affordable housing
- 4) Support low-income and vulnerable populations
- 5) Support employers and workforce development
- 6) Encourage alternate transportation and parking options
- 7) Change public perception of affordable housing
- 8) Advocate for change to state and federal policies

Recommendations around these goals are consistent with many proactive policies already adopted and build on past efforts. The “Great Neighborhoods” section of the city’s land use Master Plan promotes a broad range of housing options. The Master Plan calls for a range of housing types within neighborhoods to accommodate all residents regardless of income, special need or place in life cycle (e.g. single, married, with children, empty nest, or retired). The Zoning Ordinance is the regulatory device that implements the Master Plan.

As an example, the Zoning Ordinance already allows accessory dwelling units in single-family neighborhoods, encouraging mixed-use buildings (with housing on the upper floors) in commercial districts and promoting infill development by permitting small homes on narrow lots. Enabling these housing options provides for less expensive types of housing to be built in the city. In addition, the Zoning Ordinance provides a density bonus for mixed-income housing projects. The Ordinance also establishes staff review and approval standards for many types of development projects.

The *Great Housing Strategies* recommends further modifications to the Zoning Ordinance to expand efforts to promote accessory dwelling units by creating explicit definitions of cooperative and co-housing in the Zoning Ordinance, making cooperative housing a Special Land Use with Planning Commission approval, removing the 12-month owner-occupancy requirement from the Accessory Dwelling Unit policy, reducing the average lot size requirement for two-unit dwellings, defining and regulating micro-units in the Zoning Ordinance, expanding development of accessible housing and creating an incentive to develop Type B (Adaptable) accessible units. (*GHS Draft Report*, 10/5/15, pp. 18-22)

On November 6, 2015, the city announced that it is planning to add the term "micro-unit" to its zoning ordinance and to offer a parking incentive to housing developers that build such apartments. The definition of micro-unit is a residence 475 square feet or smaller in a mixed-use commercial building. In exchange for building micro-units, developers can get a reduction on the required amount of vehicle parking they must provide, from one space per unit to one space per two units, so long as two bicycle parking spaces per unit are provided. Small apartments offer one option for easing the "affordable housing" shortage. Allowing a developer to build less parking for micro-units both ties into the city's urbanization and mobility goals and cuts the cost of construction; the less a developer spends on parking the more affordable the housing can be.<sup>15</sup>

This strategy definitely broadens the range of choice available to residents and, because it does not depend on scarce subsidy funds, is limited only by the depth of the market. But it does not address families' need for living space. The production of affordable units for households larger than 1-2 adults will continue to be a "non-economic" enterprise, dependent on the availability of public resources.

Additionally, the *Great Housing Strategies* Report calls for actions to promote the development of mixed-income neighborhoods by modifying specific economic development and affordable housing programs, educating communities about the importance of mixed-income neighborhoods, and establishing practices and coordinating programs to make mixed-income projects more achievable. In order to increase the supply of affordable housing, the Report recommends the establishment of a housing trust fund, development of tools such as community land trusts, protection of low-income households from discrimination based on source of income and explore various tax reduction, exemption, and credit strategies to make housing more affordable.

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<sup>15</sup> [http://www.mlive.com/news/grand-rapids/index.ssf/2015/11/grand\\_rapids\\_affordable\\_housin.html](http://www.mlive.com/news/grand-rapids/index.ssf/2015/11/grand_rapids_affordable_housin.html). See also 10/5 *Great Housing Strategies* report, pp. 20-21.

The Report includes recommendations to remove barriers for vulnerable populations such as supporting a Housing First approach to expanding opportunities for homeless persons, expanding options for aging-in-place, better consumer and landlord education, and creating an eviction diversion program.

To support employers and workers, the Report calls for incentives for employers who provide housing assistance and/or locate in high-unemployment areas, increasing opportunities such as coaching and mentoring to support new members of the workforce, education of employers on racial equity and inclusion, creation of live-work developments in neighborhood commercial districts, and the development of cooperative business models. In addition, the Report noted the importance of public transportation that operates during all work shifts, connecting housing with work places.

While inclusionary zoning was discussed by the Great Housing Strategy workgroups as a tool worth considering in more depth, current State laws prohibit such a policy. MCL 123.411 states that a city cannot enforce an ordinance “that would have the effect of controlling the amount of rent charged for leasing private residential property” or mandate that a development have a certain percentage of units at a certain and artificially reduced lease rate could directly violate this statute. The Report recommends the formation of regional partnerships to understand what state-level barriers exist, and to explore advocacy actions to remove those barriers where feasible.

## **Wyoming**

The Wyoming Analysis of Impediments to Fair Housing (AI) notes that the city has no ordinances restricting accessory dwelling units, allowing future development of affordable housing with incremental increases in density as a result. It also notes that the city Master Plan encourages increased density, walkability, and variety in housing choice.

Input from the focus groups convened for the development of the AI noted that:

- Rental inspections do not seem to be driven by prioritizing offenders
- Residents perceive property taxes to be higher than neighboring communities

Barriers identified in the Analysis of Impediments include:

- A review of discrimination complaints and fair housing testing reveals that the city may have instances of housing discrimination within rental housing and discriminatory advertising based on race, national origin and familial-status (presence of children under the age of 18.) **Recommended actions:** Consider encouraging landlords of residential rental properties to receive fair housing training or require them to self-train on fair housing laws and regulations and submit proof to the city. Such training is offered by the Fair Housing Center of West Michigan in conjunction with the City of Wyoming. Information from the focus groups indicates that banking institutions, in an attempt to "triage and sell" the oversupply of homes, invested in selling properties in higher income, higher value and whiter neighborhoods. Homes in lower income, lower value and minority neighborhoods sat vacant and were not maintained or secured. This represented a form of redlining. **Recommended actions:** Increase code enforcement on trouble properties, regardless of ownership status or vacancy status. Create a fund specifically for maintaining vacant and unsecured lots.

In addition, among its suggested actions, the AI noted several high-priority goals:

- Since heightened scrutiny by lenders is preventing many would-be buyers from entering the owner housing market, the AI recommends that the city should work with social service agencies, MSU Extension, local school districts, secondary education providers and lending institutions to encourage their work with families who seek to better their housing situation by offering free or reduced-cost financial literacy tools and estate planning.
- Vacant buildings can remain undeveloped because it is cheaper for investors, speculators, and slumlords to simply sit on vacant, often blighted buildings. As a result, the AI recommends that the city conduct a study of vacant property to market redevelopment sites within the city, promoting that sites are vacant and are ripe for redevelopment, especially crucial sites like Klingman's, Studio 28, and the General Motors site.
- Following a review of the Planning Commission, Zoning Board of Appeals, Downtown Development Authority, Community Development Committee and Housing Commission members, the AI determined that a majority of members are male and live south of 28th Street; as a result, as terms expire, City Council should ensure that the selection of Board/Commission members is more balanced by gender, race, ethnicity, and geography so that different aspects of the community are represented.
- Available data indicates that the gay, lesbian, bisexual and transgendered population faces housing discrimination in the State of Michigan due to a lack of laws protecting them from such discrimination. As a result, the AI recommends amending

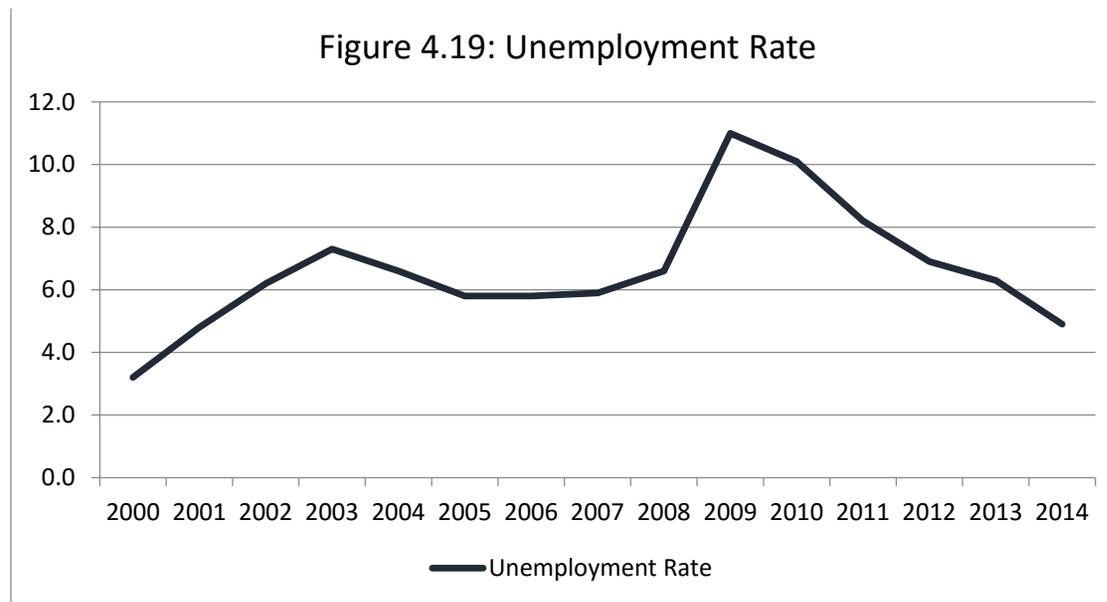
the City of Wyoming's Fair Housing Ordinance to prohibit housing discrimination on the basis of sexual orientation and gender identity.

- Data from the community survey indicates that residents want to live in single family homes in the southern and western neighborhoods. Based on this, the AI recommends that the city provide information and resources to help developers make use of existing State and Federal incentives for infill development and mixed-income housing. The AI also recommends streamlining processes and procedures, where applicable, to ensure that zoning and building regulations are not an impediment to redevelopment. The AI notes that regardless of housing price and type, different portions of the city should have a variety of housing types and price points.

## NON-HOUSING COMMUNITY DEVELOPMENT ASSETS – 91.215 (F)

### Introduction

Economic conditions in Kent County have recovered well over the past several years from the economic recession. In general, economic conditions in the region fared better than the balance of the State. As indicated in Figure 4.19 below, the unemployment rate has dropped to 4.9 percent, close to 2001 levels.



Source: Bureau of Labor Statistics

Likewise, according to the Bureau of Labor Statistics, the labor force in Kent County has gained more than 20,000 jobs since 2011 as the economy has recovered from the recession. As of 2014, the labor force in Kent County is 335,617 workers.

As illustrated in the tables below, the largest industries in Kent County are manufacturing (62,301 jobs), health care and social assistance (54,374 jobs). As indicated in the average wages, many industry jobs earn well above median income in Kent County while

other high employment industries such as administrative services, retail trade, and accommodations and food service earn a much lower wage.

Looking more closely at projected industry growth between 2010 and 2020, industry subsectors that are expected to increase in employment by more than 20 percent include:

- Administrative and Support Services
- Social Assistance
- Professional and Business Services
- Truck Transportation
- Professional, Scientific and Technical Services
- Ambulatory Health Care Services
- Nursing and Residential Care Facilities
- Transportation and Equipment Manufacturing

The economy of the Grand Rapids MSA is expanding rapidly, especially since 2012, when 13,000 new jobs were created. Forbes Magazine listed Grand Rapids at number four on its list of the ten best cities to find a job, behind only Bethesda Maryland, Austin Texas, and Jacksonville Florida.

In October 2014 Forbes.com ranked Grand Rapids-Wyoming fifth-best in the country for regional economic growth on a per capita basis from 2010 through 2013, based on a study by the Bureau of Economic Analysis. At 7.8 percent, Grand Rapids' per capita gross domestic product (GDP) growth rate (2010–2013) more than doubled the national growth rate of 3.8 percent.

In a December 2014 report, MiBiz.com noted that “The Central West Michigan economy is supported by the surprising strength of Grand Rapids.” The report noted “Demand for office furniture is expected to improve through 2015 as the U.S. gains momentum, adding to regional economic activity.”

However, income growth is not keeping pace. The same MiBiz.com report cited above noted that wages in the Grand Rapids-Wyoming MSA have fallen 4 percent from 2010 to 2013, despite job growth increasing 14 percent;. 16F<sup>16</sup>.

Brookings institution has noted that as of 2009 economic outcomes are far less equal in Michigan metros than in other comparable metro areas studied; in its study, Grand Rapids was the most “unequal” out of 10 comparable metros.<sup>17F</sup><sup>17</sup>

## Economic Development Market Analysis

### Business by Industry (Kent County)

The figure below displays the average employment in various sectors of the Grand Rapids area economy, along with the average annual wage, based on data from the 2014 Michigan Labor Market Information. Among the sectors with high average employment and high annual wages are manufacturing, health care and social assistance, and wholesale trade. The sectors with the highest employment and the lowest wages include Administrative and waste services and Accommodation and food services.

**Table 4.9: Average Employment and Average Annual Wages by Industry**

Industry	Average Employment	Average Annual Wages
Manufacturing	62,301	\$57,460
Health care and social assistance	54,374	\$49,972
Administrative and waste services	42,336	\$25,792
Retail trade	34,061	\$30,212
Accommodation and food services	27,044	\$15,756
Wholesale trade	21,438	\$58,656
Professional and technical services	14,993	\$62,556
Finance and insurance	14,074	\$65,572
Construction	13,611	\$54,444
Other services, except public administration	11,569	\$30,264

<sup>16</sup> See <http://mibiz.com/item/22054-report-grand-rapids-anchors-economic-growth-in-west-and-central-michigan#sthash.eWVWwGig.6LwuTqew.dpuf>

<sup>17</sup> See [http://www.brookings.edu/~media/Research/Files/Reports/2012/2/23-michigan-economy/0223\\_michigan\\_detroit\\_grandrapids.pdf](http://www.brookings.edu/~media/Research/Files/Reports/2012/2/23-michigan-economy/0223_michigan_detroit_grandrapids.pdf) for methodology in measuring inequality

Industry	Average Employment	Average Annual Wages
Educational services	9,726	\$33,332
Transportation and warehousing	8,592	\$47,164
Management of companies and enterprises	5,559	\$89,388
Arts, entertainment, and recreation	3,979	\$19,552
Information	3,946	\$55,848
Real estate and rental and leasing	3,732	\$36,764
Agriculture, forestry, fishing and hunting	1,851	\$26,052
Utilities	809	\$84,968
Mining	115	\$70,928

Source: 2014 Michigan Labor Market Information

#### Projected Industry Growth (2010 – 2020) for Grand Rapids Economic Forecast Area

The table below displays projected growth in various job sectors in the forecast area. High growth is expected in administrative and support services, social assistance, and professional and business services. Little or no growth is expected in several areas of the manufacturing economy, State and local government, and Food and beverage stores.

**Table 4.10: Grand Rapids Economic Forecast Area**

Industry	2010 Employment	Projected 2020 Employment	Numeric Change	Percent Change
Administrative and Support Services	37,270	51,420	14,150	38
Social Assistance	6,540	8,830	2,290	35
Professional and Business Services	60,710	79,290	18,580	30.6
Truck Transportation	5,870	7,300	1,430	24.3
Professional, Scientific, and Technical Services	17,340	21,500	4,160	23.9
Ambulatory Health Care Services	19,090	23,350	4,260	22.3
Nursing and Residential Care Facilities	13,290	16,090	2,800	21
Transportation Equipment Manufacturing	10,380	12,530	2,150	20.7
Machinery Manufacturing	8,890	10,500	1,610	18.1

Industry	2010 Employment	Projected 2020 Employment	Numeric Change	Percent Change
Specialty Trade Contractors	12,200	14,160	1,960	16.1
Hospitals	21,910	25,200	3,290	15
Food Manufacturing	9,870	11,330	1,460	14.8
Education and Health Services	100,220	114,850	14,630	14.6
Construction	16,950	19,390	2,440	14.4
Services-Providing	340,780	387,240	46,460	13.6
Fabricated Metal Product Manufacturing	10,850	12,230	1,380	12.7
Merchant Wholesalers, Durable Goods	12,590	14,020	1,430	11.4
Plastics and Rubber Products Manufacturing	7,000	7,730	730	10.5
General Merchandise Stores	11,020	12,140	1,120	10.2
Wholesale Trade	23,400	25,650	2,250	9.6
Insurance Carriers and Related Activities	9,440	10,340	900	9.5
Goods-Producing	105,550	115,500	9,950	9.4
Finance and Insurance	16,530	17,960	1,430	8.7
Manufacturing	88,270	95,820	7,550	8.6
Leisure and Hospitality	39,010	42,220	3,210	8.2
Religious, Grantmaking, Civic, Professional, and Similar Org	10,710	11,570	860	8
Merchant Wholesalers, Nondurable Goods	8,570	9,190	620	7.1
Retail Trade	43,430	46,320	2,890	6.7
Food Services and Drinking Places	31,040	33,040	2,000	6.4
Other Services (Except Government)	19,410	20,600	1,190	6.1
Credit Intermediation and Related Activities	5,910	6,250	340	5.8
Educational Services	39,390	41,380	1,990	5.1
Furniture and Related Product Manufacturing	12,770	13,390	620	4.9
State Government, Excluding Education and Hospitals	14,430	14,810	380	2.7

Industry	2010 Employment	Projected 2020 Employment	Numeric Change	Percent Change
Food and Beverage Stores	6,180	6,340	160	2.6
Local, Excluding Education and Hospitals	11,170	11,420	250	2.2
Computer and Electronic Product Manufacturing	6,460	6,430	-30	-0.5
Chemical Manufacturing	7,300	6,770	-530	-7.3
<b>Total All Industries</b>	<b>446,320</b>	<b>502,740</b>	<b>56,420</b>	<b>11.5</b>

Source: 2014 Michigan Labor Market Information

### Labor Force

The tables below reflect labor force data, including the number employed and unemployment rate in the civilian labor force, and the number of people employed in various occupations by sector from the American Communities Survey. The tables also illustrate that most workers—79 percent—commute less than 30 minutes to work daily.

**Table 4.11: Total Population in Civilian Labor Force**

<b>Total Population in the Civilian Labor Force</b>	<b>335,617</b>
<b>Civilian Employed Population 16 years and over</b>	<b>319,226</b>
<b>Unemployment Rate</b>	<b>4.9%</b>

Source: 2015 Bureau of Labor Statistics

**Table 4.12: Occupations by Sector**

Occupations by Sector	Number of People	Median Income
Management, business and financial	39,534	\$ 53,881
Farming, fisheries and forestry	2,133	\$13,125
Service	47,207	\$13,727
Sales and office	73,482	\$27,965

Occupations by Sector	Number of People	Median Income
Construction and Extraction	10,319	\$32,237
Production, transportation and material moving	46,728	\$28,396
Computer, Engineering and Science	14,269	\$61,478
Education, legal, community service, arts, and media	30,445	\$39,477
Healthcare practitioner and technical	15,811	\$47,630
Installation, Maintenance and Repair	7,841	\$38,922

Source: 2008-2012 ACS

**Table 4.13: Travel Time**

Travel Time	Number	Percentage
< 30 Minutes	212,479	79%
30-59 Minutes	46,763	17%
60 or More Minutes	10,050	4%
<b>Total</b>	<b>269,292</b>	<b>100%</b>

Source: 2008-2012 ACS

## Education

Educational Attainment by Employment Status (Population 16 and Older): Persons with less than a high school education were experiencing an unemployment rate approaching 20 percent, as of 2008-2012 ACS data. While unemployment has dropped, they are likely to be experiencing continued disproportionate unemployment.

**Table 4.14: Educational Attainment**

Educational Attainment	In Labor Force		Not in Labor Force	Unemployment Rate
	Civilian Employed	Unemployed		
Less than high school graduate	16,409	3,758	10,121	19%
High school graduate (includes equivalency)	52,410	7,441	18,890	12%

Educational Attainment	In Labor Force		Not in Labor Force	Unemployment Rate
	Civilian Employed	Unemployed		
Some college or Associate's degree	77,450	7,017	17,687	8%
Bachelor's degree or higher	87,842	3,829	12,786	4%

Source: 2008-2012 ACS

**Table 4.15: Educational Attainment by Age**

Age	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	1,216	2,987	3,363	4,473	4,477
9th to 12th grade, no diploma	8,348	6,384	4,719	8,362	7,204
High school graduate, GED, or alternative	17,181	17,547	17,936	43,277	24,348
Some college, no degree	25,048	21,059	16,735	35,517	14,423
Associate's degree	3,653	7,452	7,485	14,024	3,253
Bachelor's degree	7,623	23,494	19,100	29,236	7,733
Graduate or professional degree	250	6,653	8,404	17,650	6,165

Source: 2008 – 2012 ACS

**Table 4.16: Educational Attainment – Median Earnings in the Past 12 Months**

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$17,843
High school graduate (includes equivalency)	\$26,812
Some college or Associate's degree	\$31,273
Bachelor's degree	\$44,108
Graduate or professional degree	\$64,407

Source: 2008-2012 ACS

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

Manufacturing, a major employer in the region, pays high wages but is not growing. Recent anecdotal reports, however, indicated that office furniture manufacturing—a major manufacturing presence in the Grand Rapids market, is benefiting from the economic recovery since 2012. Health care is a growing sector, which provides a range of jobs at various skill and wage levels, including jobs for persons with limited education and technical skills. Administrative and support services are growing, but wages are generally lower in these jobs.

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**Describe the workforce and infrastructure needs of the business community:**

During the consultation process, several participants noted the interrelationships among infrastructure needs—especially public transit, affordable housing, job training and employment that pays a living wage.

The Affordable Housing focus group noted the need to expand the availability of appropriate housing options that are affordable at local wages and accessible to transit. Participants suggested prioritizing mixed-income transit-oriented development and the promotion of accessory dwelling units (granny flats, etc.) in areas with robust transit options.

The Transportation and Infrastructure focus group noted an apparent disconnect; local policy tends to target areas for funding where people live, but throughout the Grand Rapids area, jobs are often out in greenfield areas; for example, much of the medical community has moved to Grand Rapids Township and many people cannot get there. Participants noted that when people get off of the bus to get to a job there are no sidewalks, and programs cannot fund sidewalks in those areas.

The Transportation/Infrastructure group also noted that lower-income persons cannot access transportation targeted to persons with disabilities and to seniors. Participants noted that employers want employees to get to work, but do not want to support transportation, and employees can't afford it. Transit needs to expand routes serving suburban areas and operate at hours that support the needs of workers on 2<sup>nd</sup> and 3<sup>rd</sup> shifts; some businesses, they noted, do not leave Grand Rapids proper because their employees bike or walk to work. They noted that Grand Valley Metro Council (GVMC) is studying transportation accessibility in Kent and parts of Ottawa County with the Federal Highway Administration and is considering developing an index that measures relative transportation affordability.

The Continuum of Care focus group noted that homeless persons have been unable to accept living wage opportunities because they cannot get to work.

**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.**

In 2014 Grand Rapids-Wyoming announced 22 projects totaling \$315 million in capital investment, and creating 2,183 jobs. For example, Chinese auto supplier Dicastal North America decided to establish its first U.S. facility in nearby Greenville. The \$140 million plant will hire 300 workers over the next four years to manufacture aluminum-alloy wheels. The company explored 35 sites in seven states before making its final decision.<sup>18</sup>

The Economic Development Focus Group noted that, in contrast to the recent years, construction jobs are suddenly booming again. However, the Human Services focus group noted that since the State has reorganized job training regionally, training opportunities are not always accessible and many people need to travel some distance for training and employment. Focus group participants noted that connecting prospective employees to training and jobs has not been a priority for employers; they do not seem to have connected the problems that employees face getting to work with their problems in finding enough trained employees.

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

In the consultation process, the Human Services focus group noted that persons in Grand Rapids who need training tend to be younger than those from rural areas.

Economic Development focus group participants noted that they are looking for people ready to work but that job training often has to start with basic employability skills, but the Human Services group noted that trainees need to move quickly into a job that pays a living wage—they can't afford to spend 6-12 months in training. As a result, they often quit training for a longer-term better outcome and go into temporary jobs.

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<sup>18</sup> [http://www.mlive.com/business/west-michigan/index.ssf/2015/06/greater\\_grand\\_rapids\\_metro\\_are.html](http://www.mlive.com/business/west-michigan/index.ssf/2015/06/greater_grand_rapids_metro_are.html)

Economic Development group participants noted that in the past they have paid to train workers and lose them to other states where they can get higher wages. They noted that we may need a conversation about van pools to get people to work, even if the job is only 10-15 minutes away; the job market is tighter now, and employers may be willing to do more.

The Economic Development group noted that small, family-run businesses want access to business advice or cooperative marketing, but there was no strong consensus among participants in the ED focus group about the value of start-up capital.

**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.**

Grand Rapids Community College is focusing on the demographics on the southeast side of Grand Rapids. Funded through the Kellogg Foundation and the Essential Needs Task Force, it is focusing on neighborhoods referred to as “Hope Zones.” Many single female heads of household reside in this area who would benefit from job training. Participants in the economic development focus group noted that regional job training programs often focus on jobs of greatest interest to employers, such as construction trades. They observed that a goal of the Hope Zones is to provide training more focused on the interests of trainees.

## NEEDS AND MARKET ANALYSIS DISCUSSION

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

The recent economic growth in the market continues to put upward pressure on the costs of both owner and rental housing. Significant incidents of cost burdened households can be found throughout region. Central Grand Rapids has both a generally high concentration of cost burdened households and a higher percentage of rental properties. In some neighborhoods residents are becoming rent-burdened as increasing demand has resulted in the conversion of some single-family rentals back to owner-occupancy, significantly increased rents on the remaining rental properties. In other neighborhoods, where depressed housing values persist, low- and very low-income renters face persisting cost burden resulting from increasingly scarce rentals in the broader market and a general lack of better-paying jobs for low-skill workers. Cost Burden in Central Grand Rapids affects many of the neighborhoods of the City's General Target Area.

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

Relatively higher concentrations of Hispanic households are found in northern Wyoming and southwest Grand Rapids; generally higher concentrations of African Americans are located in the neighborhoods of Central Grand Rapids. Racial or ethnic minority concentrations can be defined, according to one approach used by HUD, as any area where the percentage of a particular minority is at least 20 points higher than the jurisdiction or housing market percentage as a whole.

Throughout the City of Grand Rapids, the overall percentage of non-Hispanic Black African American individuals is 21.11 percent of the total population (2007-2011 ACS). In six census tracts in central Grand Rapids and one tract in Kentwood, bordering Grand Rapids, the African American population exceeds 41.11 percent, or 20 points higher than Grand Rapids as a whole.

Throughout the City of Wyoming, the overall percentage of Hispanic individuals is 16.37 percent of the total population (2007-2011 ACS). In 5 census tracts in northern Wyoming and southwest Grand Rapids bordering Wyoming, the Hispanic population exceeds 36.37 percent, or 20 points higher than Wyoming as a whole.

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

In central Grand Rapids, general demand for housing has continued to strengthen in these neighborhoods in recent years, leading to increases in housing sales prices and scarce rentals in some neighborhoods. In the single-family neighborhoods of northern Wyoming, demand for single-family rentals remains high. Some of these became rentals following the foreclosure crisis of 2007-2009, and they remain an important asset in addressing demand in a changing market.

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**Are there any community assets in these areas/neighborhoods?**

The Grand Rapids Neighborhoods generally have good walkable connections to a range of services and public transportation options. In addition, the neighborhood associations, with the support of the City of Grand Rapids, provide leadership support and crime prevention activities essential to sustaining continuing improvement in the quality of neighborhood life for low-income residents. The City of Wyoming has good proximity to job opportunities with transit connections to the rest of the metropolitan area. In addition, the Hispanic Center of West Michigan, located near the Grand Rapids-Wyoming boundary, provides a range of culturally appropriate services and opportunities to Hispanic families throughout the region.

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**Are there other strategic opportunities in any of these areas?**

Supporting and linking residents in these areas to employment and training programs and the employment centers of the region will be important to ensuring that African American and Hispanic residents of the region can increasingly benefit from the economic growth underway in the region.

# Strategic Plan

## SECTION V: STRATEGIC PLAN

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### Overview

The strategic plan outlines each jurisdiction's plan for allocating HUD entitlement grants and identifies local priorities within the regional context. Informed by qualitative and quantitative data gathered through citizen participation and consultation with stakeholders throughout the region, market analysis, and an assessment of U.S. Census and other local data that reflect community needs, the strategic plan identifies the highest priority needs toward which to direct grant dollars. The following regional goals were identified to meet these high-priority needs (in no particular order or ranking):

- **Goal 1: Improve the Condition of Existing Housing.** Rehabilitate and preserve owner- and renter-occupied housing to bring units to code standard or provide safety improvements, energy efficiency improvements, access modifications, or treatment of lead or other home hazards.
- **Goal 2: Increase the Supply of Affordable Housing.** Create affordable housing through new construction and rehabilitation for homeowners and renters, including permanent supportive housing.
- **Goal 3: Improve Access to and Stability of Affordable Housing.** Increase opportunities for housing stability through homebuyer down payment assistance, tenant based rental assistance and other support; fair housing education and enforcement, legal assistance for housing matters, and financial/homeownership counseling. Assist homeless individuals and families to stabilize in permanent housing after experiencing a housing crisis by providing client-appropriate housing and supportive service solutions; and provide homeless households with rapid re-housing rental assistance to move them as quickly as possible into permanent housing.
- **Goal 4: Reduce Blight and Code Violations.** Improve public health and safety, reduce blighting influences, and improve property values through code enforcement and clearance of blighted structures or structures in flood-prone areas.
- **Goal 5: Increase Civic Engagement and Public Safety.** Supports: 1) quality of life and sense of community in neighborhoods by decreasing or preventing crime; 2) neighborhood leadership and civic engagement as the means to build great neighborhoods; and 3) disaster mitigation and planning activities.

- **Goal 6: Enhance Infrastructure and Public Facilities.** Enhance publically-owned facilities and infrastructure, such as parks, streets, sidewalks, streetscapes and other public infrastructure and facilities, including improving accessibility to meet Americans with Disabilities Act (ADA) standards.
- **Goal 7: Increase Access to Jobs, Education and Other Services.** Increase access to jobs, education, health and wellness, recreation, and health and social service activities.
- **Goal 8: Increase Economic Opportunities.** Enhance economic stability and prosperity by increasing economic opportunities for residents through job readiness and skill training, promotion of entrepreneurship (including among culturally diverse populations), façade improvements, and other strategies.

While Kent County and the cities of Grand Rapids and Wyoming engaged in a coordinated planning process, each jurisdiction is responsible for allocating its own resources across these goals. Table 5.7: Goals Summary Information later in this section identifies the specific funding and anticipated outcomes by each jurisdiction.

## **GEOGRAPHIC PRIORITIES – 91.215 (A)(1)**

### **General Allocation Priorities: Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)**

Kent County and the cities of Grand Rapids and Wyoming each invests community development resources to address needs of low- and moderate-income persons who live throughout its entire jurisdiction. Additionally, each allocates resources that are more geographically targeted toward a specific neighborhood or district in which the majority of residents are of low- or moderate-income. With limited resources, each community identifies opportunities to target resources at areas that have the greatest need or that would maximize the impact of the investment. The basis for allocating resources are summarized for each jurisdiction below.

#### **Kent County**

The County of Kent has historically allocated the majority of entitlement funds received from HUD to 32 participating local units of government, based upon the proportion of the low- and moderate-income population residing in each community. In order to ensure that decisions are made at the community level, the Kent County CDBG program has adopted the philosophy of allowing Participating Communities to identify eligible projects, programs, and locations consistent with the detailed administrative guidelines. Kent County firmly believes that the local decision making process is best suited to identify local eligible programs and projects.

The majority of CDBG funding is directed toward census tracts in which the low- and moderate-income population is 39.06 percent or higher. Kent County is considered an exception grantee by HUD regulations, which allows it to qualify census tracts in which the percentage of low- or moderate-income persons is a lower percentage than the standard 51 percent required for most grantees.

The County also funds moderate and minor housing rehabilitation services through its Housing Rehab program including access modification for disabled individuals. Additionally, the County has a robust partnership with non-profit partners to provide support for public service activities.

Kent County and Wyoming enjoy a Consortium Agreement related to HOME program funds. The City of Wyoming and the County formed a HOME Consortium in 2010. It was also agreed that the County, as the lead entity, would assume overall responsibility for

the Kent HOME Consortium. Kent County administers the funds, with the City of Wyoming providing input on its share of the funds and its related applications from area developers. In the event that no eligible project in the City of Wyoming can be committed within 18 months or completed within 42 months of HUD contract award, then the funds which have not been committed or expended are reallocated by the County for other HOME-eligible projects. The City of Wyoming, by HUD regulation, retains the right to opt out of the Consortium agreement should it desire.

### **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 moderate-income 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 major housing rehabilitation programs, street improvements, concentrated code enforcement, and support of neighborhood associations. 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 handicap accessibility and minor home repairs. HOME and ESG funds may be used anywhere in the City to benefit income-eligible persons.



## **Wyoming**

The City of Wyoming CDBG funds support both programs with city-wide impact and programs targeting to low- and moderate-income geographic areas. The City actively solicits grant requests each year; annual applications are unique, and include both continued funding requests and new initiatives. Historically, the City of Wyoming has addressed housing priorities through Housing Rehabilitation, Code Enforcement, Clearance/Demolition, Fair Housing education and enforcement, services for persons who are homeless or may become homeless, and Public Services. Since the inception of its program, 100 percent of funds have been allocated to low- and moderate-income persons.

As noted earlier, Wyoming and Kent County have maintained a Consortium Agreement related to HOME program funds since 2010. Kent County administers the funds, while the City of Wyoming has input on its share of the funds and its related applications from area developers. The City of Wyoming, by HUD regulation, retains the right to opt out of the Consortium agreement should it desire.

## PRIORITY NEEDS - 91.215(A)(2)

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### Priority Needs

Kent County and the cities of Grand Rapids and Wyoming conducted an extensive needs assessment and consultation process that identified many priority needs across the region. The needs identified were reviewed both collectively and individually by the jurisdictions. Virtually all housing and community development needs were identified as important across the region. However, due to a lack of resources, each jurisdiction was not able to fund activities to address all priority needs. In some cases, a priority need was not funded because it was being addressed through other community resources.

The Priority Needs Summary Table assigns a “high” or “low” priority to each need, as prescribed by HUD. Generally, designating a need as “high priority” means that the jurisdiction plans to allocate funding to address it during the five-year consolidated plan period. A low priority need indicates that, while the need is a recognized priority, there may be insufficient funds to address it with Federal community development resources. To the extent community partners are able to assume these activities through other funding sources, the Plan would support them. Changes in the availability of resources may allow certain low priority needs to be funded, or, conversely, for high priority needs not to be funded. As conditions and resources available vary by jurisdiction, so does the level of priority attached to each need. A high or low priority designation is assigned to each priority need for each jurisdiction.

**Table 5.1: Priority Needs Summary Table**

<b>1</b>	<b>Priority Need Name</b>	<b>Maintenance of Owner-Occupied Housing</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Large Families	Families with Children Elderly Person with Physical Disabilities
	<b>Associated Goals</b>	Improve the Condition of Existing Housing	
	<b>Description</b>	Health, safety and maintenance of owner-occupied housing, including lead hazard reduction.	
	<b>Basis for Relative Priority</b>	Owner-occupied housing predominates through most of Kent County, and is a foundation of neighborhood stability throughout the region. Over 60 percent of housing stock throughout Kent County was built before 1980; lower income homeowners are often unable to pay for the full cost of needed repairs and may not be able to obtain financing at affordable rates. The Kent County Health Department estimates approximately 137,000 housing units were built prior to 1978, which have increased incidents of lead paint hazards.	
<b>2</b>	<b>Priority Need Name</b>	<b>Minor and Emergency Housing Repairs</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Large Families	Families with Children Elderly Persons with Physical Disabilities

	<b>Associated Goals</b>	Improve the Condition of Existing Housing	
	<b>Description</b>	Housing in need of minor and emergency repairs, including accessibility modification.	
	<b>Basis for Relative Priority</b>	Comprising 70 percent of units throughout the County, owner-occupied housing is a vital part of the housing supply and critical to the fabric of many neighborhoods. Many lower-income owners are unable to afford emergency repairs such as roof repairs or new furnaces, or would benefit from energy efficiency improvements to help maintain long-term affordability. Accessibility modifications can help the County's growing numbers of older adults seeking to remain in their own homes or rental units.	
<b>3</b>	<b>Priority Need Name</b>	<b>Maintenance of Rental Housing</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (Low)	
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Persons who are Chronically Homelessness Veterans and Persons with Chronic Substance	Persons with HIV/AIDS Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Associated Goals</b>	Improve the Condition of Existing Housing	
	<b>Description</b>	Health, safety and maintenance of rental housing, including lead hazard reduction.	
	<b>Basis for Relative Priority</b>	Maintaining the region's aging rental housing stock is critical as the supply of quality, affordable rental housing is in high demand. Additionally, placement of lower income residents in housing choice voucher and tenant-based rental assistance programs requires the availability of sufficient rental units that meet housing standards.	

<b>4</b>	<b>Priority Need Name</b>	<b>Development of Quality Affordable Rental Housing</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (Low)	
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Persons who are Chronically Homelessness Veterans with Chronic Substance Abuse	Persons with HIV/AIDS Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Associated Goals</b>	Increase the Supply of Affordable Housing	
	<b>Description</b>	Development of quality affordable rental housing.	
	<b>Basis for Relative Priority</b>	Rental housing is in high demand, putting extreme pressure on the quality and availability of both affordable rental housing for low- and moderate-income persons and permanent supportive housing for persons who are homeless or at risk of becoming homeless.	
<b>5</b>	<b>Priority Need Name</b>	<b>Development of Affordable Owner-Occupied Housing</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (Low)	
	<b>Population</b>	Extremely Low Low Moderate	Large Families Families with Children Elderly
	<b>Associated Goals</b>	Increase the Supply of Affordable Housing	

	<b>Description</b>	Development of high quality, affordable owner-occupied housing.	
	<b>Basis for Relative Priority</b>	Homeownership opportunities that are affordable to households with a wide range of incomes are a priority for the preservation of mixed-income neighborhoods and an important strategy in a housing market in which single-family neighborhoods predominate and affordable housing opportunities are in increasingly short supply.	
<b>6</b>	<b>Priority Need Name</b>	<b>Permanent Supportive Housing</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Families with Children Persons who are Chronically Homelessness Veterans with Chronic Substance Abuse Persons with HIV/AIDS	Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Associated Goals</b>	Increase the Supply of Affordable Housing	
	<b>Description</b>	Development of permanent supportive housing with adequate support to ensure successful occupancy.	
	<b>Basis for Relative Priority</b>	Permanent supportive housing is needed for vulnerable populations, including people with disabilities, people recovering from substance abuse, people with other health issues, chronically homeless people, and individuals and families at risk of becoming homeless. The intent of such housing is to improve housing stability, empower residents to live independently, and to enable seniors to age in place.	

7	Priority Need Name	Access to and Stability of Affordable Owner Housing	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate	Large Families Families with Children Elderly
	<b>Associated Goals</b>	Improve Access to and Stability of Affordable Housing	
	<b>Description</b>	Increased opportunities for affordable owner-occupied housing access and stability through supportive programs such as homebuyer down payment assistance, legal assistance for housing matters, financial/homeownership counseling, and other support.	
	<b>Basis for Relative Priority</b>	A range of housing services is critical to help new homeowners obtain and sustain homeownership. As a region with a high percentage of single family homes, financing and counseling can help provide ownership opportunities for low- and moderate-income persons. Supporting higher owner-occupancy rates improves neighborhood vitality and sustainability.	

8	Priority Need Name	Access to and Stability of Affordable Rental Housing	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (Low)	
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Persons who are Chronically Homelessness Veterans with Chronic Substance Abuse	Persons with HIV/AIDS Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Associated Goals</b>	Improve Access to and Stability of Affordable Housing	
	<b>Description</b>	Increased opportunities for access to affordable rental housing and stability for low- and moderate-income persons, including those at risk of becoming homeless, through programs such as tenant-based rental assistance and rapid re-housing.	
	<b>Basis for Relative Priority</b>	With vacancy at historically low levels and rents increasing, affordable rental housing is in high demand and difficult for low-income households to access. Tenant-based rental assistance and rapid re-housing resources ensure that low-income households, including homeless households, can access rental housing and not be cost-burdened.	

9	Priority Need Name	Fair Housing and Consumer Legal Services	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Persons who are Chronically Homelessness Veterans with Chronic Substance Abuse	Persons with HIV/AIDS Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Associated Goals</b>	Improve Access to and Stability of Affordable Housing	
	<b>Description</b>	Fair housing education and enforcement and housing consumer legal services.	
	<b>Basis for Relative Priority</b>	Ensuring equal access to affordable housing and de-concentration of poverty are pivotal to broadening opportunities for housing choice.	

10	Priority Need Name	Supportive Services and Special Needs Housing	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Persons who are Chronically Homelessness Veterans with Chronic Substance Abuse	Persons with HIV/AIDS Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Associated Goals</b>	Improve Access to and Stability of Affordable Housing	
	<b>Description</b>	Supportive services for formerly homeless and persons with special needs to remain in their housing.	
	<b>Basis for Relative Priority</b>	An increasing demand and a tightening market places a premium on helping lower-income residents maintain successful tenancy in affordable rental housing.	

11	Priority Need Name	Prevention of Homelessness	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Persons who are Chronically Homelessness Veterans with Chronic Substance Abuse	Persons with HIV/AIDS Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Associated Goals</b>	Improve Access to and Stability of Affordable Housing	
	<b>Description</b>	Prevention of homelessness for persons at risk of immediate housing loss.	
	<b>Basis for Relative Priority</b>	A tight housing market and increasing housing costs threaten more households with the loss of housing. Helping vulnerable persons to retain housing is of increasing importance as affordable rental housing becomes scarcer.	

12	Priority Need Name	Regional Response to Addressing Housing Instability	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Persons who are Chronically Homelessness Veterans with Chronic Substance Abuse	Persons with HIV/AIDS Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Associated Goals</b>	Improve Access to and Stability of Affordable Housing	
	<b>Description</b>	Regional response to addressing housing instability and homelessness, including development of strategies and support of the Continuum of Care infrastructure.	
	<b>Basis for Relative Priority</b>	Supporting and sustaining regional capacity to address homelessness is key to aligning resources for housing, shelter, services and homeless prevention into a comprehensive support system.	
13	Priority Need Name	Housing and Other Code Violations	
	<b>Low/High Need</b>	Kent County (Low) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development	

	<b>Associated Goals</b>	Reduce Blight and Code Violations
	<b>Description</b>	Effective response to housing and other neighborhood code violations.
	<b>Basis for Relative Priority</b>	Maintaining housing standards and addressing blight in urban neighborhoods improves community aesthetics, has a direct effect on public perceptions of crime, sustains the fabric of community, supports property values, and enhances resident health and safety.
<b>14</b>	<b>Priority Need Name</b>	<b>Clearance of Blighted Structures</b>
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Associated Goals</b>	Reduce Blight and Code Violations
	<b>Description</b>	Clearance of blighted structures, including those in flood prone areas.
	<b>Basis for Relative Priority</b>	Removal of hazardous buildings increases the quality of life and vitality of neighborhoods, supports property values, eliminates hazardous conditions and reduces opportunities for criminal activities.

<b>15</b>	<b>Priority Need Name</b>	<b>Neighborhood and Commercial District Public Safety Improvements</b>
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Associated Goals</b>	Increase Civic Engagement and Public Safety
	<b>Description</b>	Neighborhood and Commercial District Public Safety Improvements.
	<b>Basis for Relative Priority</b>	Neighborhoods should be places where residents feel safe and regularly walk to neighborhood services and amenities; commercial districts should create environments where business owners want to invest and connect with their community.
<b>16</b>	<b>Priority Need Name</b>	<b>Increased Neighborhood Leadership and Civic Engagement</b>
	<b>Low/High Need</b>	Kent County (Low) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Associated Goals</b>	Increase Civic Engagement and Public Safety
	<b>Description</b>	Increased neighborhood leadership and civic engagement.

	<b>Basis for Relative Priority</b>	Resident leadership and volunteerism are the building blocks for healthy neighborhoods; neighborhood leadership supports the effective involvement of residents, empowering them to take an active role in the betterment of their neighborhood.	
<b>17</b>	<b>Priority Need Name</b>	<b>Mitigate Flooding and Other Natural Disasters</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development	
	<b>Associated Goals</b>	Increase Civic Engagement and Public Safety; Maintain and Improve Quality of Life	
	<b>Description</b>	Effective Planning and Public Education to Mitigate Flooding and Other Natural Disasters	
	<b>Basis for Relative Priority</b>	The region regularly experiences flooding, and community preparedness is important for resilience in the face of natural disasters. Through education and awareness, neighbors learn that they can and must look out for one another in a community emergency.	
<b>18</b>	<b>Priority Need Name</b>	<b>Public Infrastructure and Facility Improvements, including Disaster Mitigation</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Elderly Frail Elderly	Persons with Physical Disabilities Non-housing Community Development

	<b>Associated Goals</b>	Enhance Infrastructure and Public Facilities	
	<b>Description</b>	Infrastructure and public facility improvements, including disaster mitigation	
	<b>Basis for Relative Priority</b>	Community strategic plans (Land Use Plans, Community Recreation Plans, Capital Improvement Plans, etc.), supported by focus group and survey respondents, identified the need for improvements to parks and infrastructure, especially streets and sidewalk extensions, throughout many areas of Kent County; flood-prone areas benefit from effective disaster management and mitigation controls.	
<b>19</b>	<b>Priority Need Name</b>	<b>Accessibility Improvements to Public Facilities</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Elderly	Elderly Frail Elderly Persons with Physical Disabilities Non-housing Community Development
	<b>Associated Goals</b>	Enhance Infrastructure and Public Facilities	
	<b>Description</b>	Accessibility improvements to public infrastructure and facilities.	
	<b>Basis for Relative Priority</b>	Improving access for persons with disabilities and seniors to neighborhood public facilities and other infrastructure (e.g. curb cuts) ensures compliance with Americans with Disabilities Act (ADA) standards and promotes the integration of all residents into community life.	

<b>20</b>	<b>Priority Need Name</b>	<b>Access to Public Services</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Elderly Frail Elderly Persons with Mental Disabilities	Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Associated Goals</b>	Increase Access to Jobs, Education and Other Services	
	<b>Description</b>	Increased access to jobs, education, health and wellness, recreation and social activities, including services for youth, seniors, persons with disabilities, and persons from diverse cultures.	
	<b>Basis for Relative Priority</b>	Youth, seniors, persons with disabilities, and persons from diverse cultures are particularly vulnerable and were identified in focus groups as needing improved access to education and other services.	
<b>21</b>	<b>Priority Need Name</b>	<b>Transportation Services</b>	
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)	
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development	

	<b>Associated Goals</b>	Increase Access to Jobs, Education and Other Services
	<b>Description</b>	Transportation services to improve access to jobs and services, especially for low-income persons and seniors in rural areas.
	<b>Basis for Relative Priority</b>	Low- and moderate-income persons and seniors whose residence or place of employment is not along public transportation routes or in rural areas need improved transportation options, especially where services and jobs are in suburban areas or employment involves working a second or third shift.
<b>22</b>	<b>Priority Need Name</b>	<b>Multicultural Supportive Services</b>
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Associated Goals</b>	Increase Access to Jobs, Education and Other Services
	<b>Description</b>	Supportive services appropriate for persons for whom English is a second language.
	<b>Basis for Relative Priority</b>	Growing Hispanic and other populations for whom English is a second language have a need for improved access to appropriate services, education and employment opportunities.

<b>23</b>	<b>Priority Need Name</b>	<b>Emergency and Outreach Services for Youth</b>
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Associated Goals</b>	Increase Access to Jobs, Education and Other Services
	<b>Description</b>	Emergency and outreach services for youth.
	<b>Basis for Relative Priority</b>	Survey responders and focus group participants identified the need for emergency and outreach services for youth as a high priority.
<b>24</b>	<b>Priority Need Name</b>	<b>Improved Access to Jobs</b>
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Associated Goals</b>	Increase Economic Opportunities
	<b>Description</b>	Improved access to jobs including improved transportation options.

	<b>Basis for Relative Priority</b>	Survey responders and focus group participants identified that workers need better transit options for employment at various locations and shifts.
<b>25</b>	<b>Priority Need Name</b>	<b>Access to Job Training and Job Readiness Training</b>
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Associated Goals</b>	Increase Economic Opportunities
	<b>Description</b>	Access to job training and job readiness training.
	<b>Basis for Relative Priority</b>	As supported by focus groups, many low-income persons are in need of additional skill training in order to access new and emerging market employment opportunities. Many young workers are in need of job readiness skills to enter the workforce.
<b>26</b>	<b>Priority Need Name</b>	<b>Job Creation</b>
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development

	<b>Associated Goals</b>	Increase Economic Opportunities
	<b>Description</b>	Job creation
	<b>Basis for Relative Priority</b>	Low- and moderate-income persons need increased opportunities for jobs that pay a living wage.
<b>27</b>	<b>Priority Need Name</b>	<b>Commercial Building Improvements</b>
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Associated Goals</b>	Increase Economic Opportunities
	<b>Description</b>	Commercial building Improvements
	<b>Basis for Relative Priority</b>	Small businesses benefit from facade and other capital improvements to promote commercial viability.

28	Priority Need Name	Economic Opportunities Diversity
	<b>Low/High Need</b>	Kent County (High) Grand Rapids (High) Wyoming (High)
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Associated Goals</b>	Increase Economic Opportunities
	<b>Description</b>	Improved economic opportunities for culturally diverse populations and business sectors.
	<b>Basis for Relative Priority</b>	Integration and expansion of diverse businesses enriches community life and expands job opportunities and commercial services for neighborhood residents.

## INFLUENCE OF MARKET CONDITIONS – 91.215(B)

As noted in the preceding sections, demand for both rental and for-sale housing has increased substantially since 2012, resulting in rents and sale prices for homes that are increasing faster than incomes. Rents in the regional market have increased by over 20 percent since late 2012 and rental vacancy has dropped to an historic low, at 1.6 percent by the end of 2014. These market trends create pressures on low-income households and suggest an important role for programs that help low-income households access and maintain occupancy in affordable housing, either through rental or purchase, as well as programs to help low-income owner occupants maintain and improve their older homes.

**Table 5.2: Influence of Market Conditions Summary Table**

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
<b>Tenant-Based Rental Assistance (TBRA)</b>	<p>The scarcity of rental housing has created substantial pressure on the availability of affordable rental housing for low- and moderate-income households at all levels. The shortage of affordable rentals also creates problems for persons who are at-risk of homelessness and places a premium on maintaining rental housing to prevent homelessness. This market environment creates a need to expand access to affordable rentals and supports the potential use of tenant-based rental assistance by all the HOME grantee jurisdictions in Kent County; the City of Grand Rapids plans to institute a homeless preference to help vulnerable households stabilize their access to housing.</p> <p>The allocation of additional funds for rental assistance will depend, in large measure, on the continuing ability to identify available units at the applicable payment standard. Although the PHAs report full utilization of vouchers, in September 2015 Grand Rapids Housing Commission officials report having near zero availability of units for voucher-holders countywide. Kent County indicates that if they allocate HOME funds for TBRA during the plan period, they will likely (a) rely on a HUD-proposed increase of about 5 percent in the FMRs, and (b) offer a payment standard of FMR plus 10 percent to make more units available for these new voucher-holders.</p>

<p><b>TBRA for Non-Homeless Special Needs</b></p>	<p>Non-homeless special needs households face challenges similar to those identified above. While persons with special needs typically require housing that is well-located to transit and services, given the scarcity of affordable rental housing, such voucher-holders may need to take advantage of any opportunity for housing, wherever they can find it.</p>
<p><b>New Unit Production</b></p>	<p>Regional market trends suggest the availability of housing affordable to low-income households will not significantly improve during the next five years. In its 2013 housing needs analysis performed for the City of Wyoming, McKenna Associates identified a regional market, based on a 20-minute drive from Wyoming; this area includes the City of Grand Rapids, as well as communities such as Kentwood, Walker, Hudsonville, Rockford, and Calendonía. In this regional market, McKenna Associates noted (a) an undersupply of over 29,000 affordable rental units (in this study, with rents below \$894 per month) and (b) an undersupply of over 41,000 units for affordable homeownership (below \$60,392). Since 2013, increases in market rents and decreasing rental vacancy, along with increasing sale prices and decreasing time-on-market for single family homes, suggest that much of the region’s development capacity will be focused on market-rate and higher income housing. In its recent Grand Rapids Target Market Analysis, Zimmerman/Volk Associates estimated the Target Market Study Area (roughly the Community Development General Target Area that comprises the neighborhoods in the central part of the City) can absorb an annual average of 826 and 1,107 new market-rate multi-family and single-family attached and detached housing units per year over the next five years. A total of 5,705 – 7,615 new units could be absorbed over the next 5-7 years, comprised of 4,130 – 5,535 market-rate units and 1,575 – 2,080 additional affordable units. The result is a continuing need for the development of additional affordable units in the market for both affordable rental and homeownership opportunities at all eligible income levels. Additionally, stresses on the rental market suggest that continuing production dedicated for permanent supportive housing will be necessary to address the needs of homeless and disabled persons.</p>
<p><b>Rehabilitation</b></p>	<p>The age of housing in Kent County reflects regional population growth patterns throughout the 20<sup>th</sup> Century. About 45 percent of the housing units in Grand Rapids were built prior to 1949. As population grew after World War II, Wyoming was largely built out over the next 30 years, with about 48 percent of its housing built from 1950-1979. About 36 percent of the housing in the balance of Kent County was built during this same period, with another 36 percent built in the following 20 years from 1980-1999. Taken together, about 60 percent of</p>

the housing in Kent County was built prior to 1980. While it is characterized by some functional obsolescence and the potential for lead-paint hazards, this older housing was well-built to withstand northern winters and is typically placed in well-planned neighborhoods which are often walkable to amenities and services. These older neighborhoods, predominantly single-family homes, form the fabric of the neighborhoods of the region, and their preservation is crucial for maintaining the quality of life for low- and moderate-income residents. Units occupied by senior residents continue to provide quality affordable housing and enable seniors to age in-place in their homes, but often need minor repairs and accessibility improvements. However, median incomes have not kept pace with rising housing costs, and low-income owner-occupants continue to need assistance. This essential rehabilitation continues to be a good investment in the preservation of these older single-family homes, which are essential to the fabric of urban neighborhoods and a valuable segment of the overall affordable housing inventory. As a result, these rehabilitation needs are especially acute for low- and moderate-income owner-occupants.

In addition, acquisition-development-resale of poorly maintained and abandoned homes by Community Housing Development Organizations (CHDOs) plays an important role in preserving mixed-income single-family neighborhoods. These neighborhoods are often strategically located near downtown Grand Rapids and neighborhood commercial centers, with good access to jobs and robust public transit. Once rehabilitated, these homes have historically provided opportunities for low-income households to become homeowners.

There is a continuing need to address lead-paint hazards in the County's older housing stock. The Kent County Health Department estimates that over 59 percent of the housing stock countywide, or approximately 137,000 housing units, were built prior to 1978 and potentially harboring lead paint hazards. While the City of Grand Rapids, with about 60,000 of these units, has invested \$23 million in the remediation of over 1,500 homes, it is estimated that of the 8,000 households under 80 percent of AMI in the County with children under 6, 4,800 live in these older homes. The elimination of lead paint hazards in these units is essential for the preservation of this critical housing resource for low-income renters and owners of all eligible income levels.

**Acquisition,  
including  
preservation**

Like most areas of Michigan, the communities of Kent County are comprised largely of single-family homes— more than 2 out of every 3 units outside of Grand Rapids, including 59 percent of the housing units in the City of Grand Rapids. Additionally, the Grand Rapids neighborhood focus group reports that as the economy has improved, many of these units are being purchased by new owner-occupants at escalating prices in a market characterized by increasing demand.

As noted in the Market Analysis section, the for-sale inventory of single-family homes countywide has dropped by more than 50 percent since 2010; during the same period, sale prices have increased 32 percent in the last four years. This continuing increase in price with decreasing supply indicates that buyers tend to be owner-occupants buying with a mortgage, no longer investors with cash.

While this is a generally positive trend for these urban neighborhoods, it has the consequence of further limiting rental options in a region where the predominance of single-family housing stock offers relatively fewer rental options than are found in urban areas characterized by more multifamily housing. In some neighborhoods in central Grand Rapids, single-family rental housing units are being lost to owner-occupancy, and population and job growth are placing further pressures on rental housing inventory. This pressure is felt especially on the inventory of affordable units, where some households that can afford higher rents are finding themselves “under-housed.” As the market responds by developing housing at all price levels, this pressure may ease somewhat as units become available for households to “move up.” However, strategies to develop and preserve affordable rental housing using such tools as low-income housing tax credits will be especially important in continuing building the inventory of assisted housing upon which low-income renters depend for quality, affordable housing.

## ANTICIPATED RESOURCES - 91.215(A)(4), 91.220(c)(1,2)

### Introduction

Kent County, the City of Grand Rapids and the City of Wyoming each receive federal assistance, from the U.S. Department of Housing and Urban Development (HUD) under one or more of its primary formula allocation programs. Together, the jurisdictions anticipate receiving approximately \$37 million through three programs over the next five years:

**Table 5.3: Anticipated Resources Five Year Summary**

Formula Grant Program	Kent County	Grand Rapids	Wyoming
<b>The Community Development Block Grant Program (CDBG)</b>	\$7,438,118	\$19,283,552	\$2,886,391
<b>The HOME Investment Partnership Program (HOME)</b>	3,112,456	\$5,082,248	*
<b>The Emergency Solutions Grant Program (ESG)</b>	0	\$1,581,050	0
<b>Total</b>	\$10,550,574	\$25,946,850	\$2,867,682

\* The City of Wyoming and Kent County formed a HOME Consortium in 2010. Kent County administers the funds, while the City of Wyoming has input on its share of the funds and its related applications from area developers. The City of Wyoming's HOME allocation of \$270,000 is combined with Kent County.

Each Community's funding is administrated by its respective Community Development Department for a variety of purposes that meet the intent of the funding for each specific program. Federal funds are leveraged against numerous other sources of federal, state, local and private funding.

The jurisdictions partner, in varying degrees, with a number of housing developers, public service agencies and homeless shelter/housing providers to maximize CDBG and HOME resources and other public and private resources. The costs to address the broad housing and community needs of the region cannot be covered through a single source, but must be supported through a number of layered and pooled funding streams.

Funding projections assume level funding for the duration of the Plan.

**Table 5.4: Anticipated Resources Summary Table**

Program	Source of Funds	Use of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of Con Plan	Narrative Description	
			Allocation	Program Income	Prior Year Resources			Total
<b>Grand Rapids</b>								
<b>CDBG</b>	Public-Federal	Acquisition Admin and Planning Economic Development Housing Rehab Public Improvement Public Services	\$3,445,888	\$250,000	\$804,112	\$4,500,000	\$14,783,552	Block grant from U.S. Department of Housing and Urban Development to address housing, community development and economic development needs.
<b>HOME</b>	Public-Federal	Acquisition Homebuyer Assistance Homeowner Rehab Rental Housing New Construction Rental Housing Rehab New Construction for Ownership	\$1,015,562	\$4,438		\$1,020,000	\$4,062,248	Grant from U.S. Department of Housing and Urban Development to address affordable housing needs.
<b>ESG</b>	Public-Federal	Conversion and Rehab for transitional	\$316,210			\$316,210	\$1,264,080	Grant from U.S. Department of Housing and Urban

Program	Source of Funds	Use of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Allocation	Program Income	Prior Year Resources	Total		
		housing Financial Assistance Overnight Shelter Rapid Re-Housing (Rental Assistance) Rental Assistance Services Transitional Housing						Development to address needs and services for homeless persons or persons at risk of becoming homeless.
<b>Subtotal</b>			\$4,777,660	\$254,438	\$804,112	\$5,836,210	\$20,110,640	
<b>Kent County</b>								
<b>CDBG</b>	Public-Federal	Acquisition Admin and Planning Economic Development Housing Rehab Public Improvement Public Services	\$1,497,686	\$45,000		\$1,542,686	\$5,895,432	Block grant from U.S. Department of Housing and Urban Development to address housing, community development and economic development needs.
<b>HOME*</b>	Public-Federal	Acquisition Homebuyer	\$666,707	\$20,000		\$606,437	\$2,425,749	Grant from U.S. Department of Housing and Urban

Program	Source of Funds	Use of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Allocation	Program Income	Prior Year Resources	Total		
		Assistance Homeowner Rehab Rental Housing New Construction Rental Housing Rehab New Construction for Ownership						Development to address affordable housing needs. *Wyoming HOME funds are a part of these available funds via the Consortium.
<b>Subtotal</b>			\$2,164,393	\$65,000		\$2,215,759	\$8,863,038	
<b>Wyoming</b>								
<b>CDBG</b>	Public-Federal	Acquisition Admin and Planning Economic Development Housing Rehab Public Improvement Public Services	\$470,878	\$100,000	18,709	\$589,587	\$2,296,804	Block grant from U.S. Department of Housing and Urban Development to address housing, community development and economic development needs.

**Explain how federal funds will leverage those additional resources (private, City 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.

Although the CDBG program does not require a match, the HOME program (administered by Kent County and Grand Rapids) and the ESG program (administered by Grand Rapids) require matches. The HOME program requires a 25% non-federal cash or non-cash match of the annual grant amount, entitlement, less 10% for administration and 5% for CHDO operating support. 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 our service area. As a rule, no County of Kent general fund dollars need be used to meet the match. 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.

## 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.

**Table 5.5: Institutional Delivery Structure Summary**

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
<b>City of Grand Rapids</b>	Government agency	Overall Administration	Grand Rapids
<b>Kent County</b>	Government agency	Overall Administration	Kent County – not Grand Rapids or Wyoming
<b>City of Wyoming</b>	Government agency	Overall Administration	Wyoming
<b>Grand Rapids Area Coalition to End Homelessness</b>	Continuum of Care	Planning; Homelessness	Kent County
<b>The Salvation Army Social Services</b>	Nonprofit	Planning; Homelessness	Kent County
<b>Home Repair Services of Kent County</b>	Nonprofit	Affordable housing-ownership	Kent County
<b>Habitat for Humanity of Kent County</b>	Nonprofit	Affordable housing-ownership	Kent County
<b>Dwelling Place of Grand Rapids Nonprofit Housing Corporation</b>	CHDO	Affordable Housing-rental	Kent County
<b>Genesis Nonprofit Housing Corporation</b>	Nonprofit	Affordable Housing-rental	Kent County
<b>ICCF Nonprofit Housing Corporation</b>	CHDO	Affordable Housing-ownership and rental	Kent County
<b>LINC Community Revitalization</b>	CHDO	Affordable Housing-ownership and rental	Kent County

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
<b>Kent County Health Department</b>	Government Agency	Affordable Housing-ownership and rental	Kent County
<b>Kent County Land Bank Authority</b>	Nonprofit	Affordable Housing	Kent County
<b>Healthy Homes Coalition of West Michigan (Get the Lead Out!)</b>	Nonprofit	Affordable Housing	Kent County
<b>Permanent Housing Coordination Council</b>	Regional Organization	Affordable housing – ownership-rental	Kent County
<b>Subrecipient local governments of Kent County</b>	Government Agency/subrecipient	Community development	Kent County - Not Grand Rapids or Wyoming
<b>Fair Housing Center of West Michigan</b>	Nonprofit	Planning	Kent County
<b>Kent County Housing Commission</b>	PHA	Affordable housing-rental	Kent County
<b>Rockford Housing Commission</b>	PHA	Public Housing; affordable housing-rental	Rockford and a portion of Kent County
<b>Wyoming Housing Commission</b>	PHA	Public Housing; affordable housing-rental	All of Wyoming, Kent County, and portion of Ottawa County
<b>Grand Rapids Housing Commission</b>	PHA	Public Housing; affordable housing-rental	Grand Rapids and Kent County
<b>Kent County Essential Needs Task Force</b>	Regional organization	Community development; planning	Kent County
<b>Community Rebuilders</b>	Nonprofit	Homelessness	Kent County
<b>Grand Valley Metro Council</b>	Regional organization	Planning	Kent County

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
<b>Grand Rapids Neighborhood Associations</b>	Nonprofit	Community Development	Grand Rapids neighborhoods
<b>Rental Property Owners Association</b>	Nonprofit	Affordable housing, Community Development	Kent County

### Access of Strengths and Gaps in the Institutional Delivery System

The three jurisdictions have developed sound institutional infrastructure for the delivery of housing and community development programs, and each has a rich history of successful partnerships among public and private sector entities. The institutional strengths and gaps were identified through consultations, focus groups, resident surveys, and review of planning and needs assessment processes and documents.

#### *Strengths of the delivery system*

- **Housing Developers:** Kent County is a magnet for housing developers, with a strong real estate market and a number of high-capacity for-profit and nonprofit affordable housing developers who are skilled at attracting investment of Low-Income Housing Tax Credits awarded by the State of Michigan.
- **Community Housing Development Organizations (CHDOs):** Several high-capacity CHDOs bring commitment and capacity to the preservation and revitalization of Kent County neighborhoods and to the development, ownership and management of multifamily housing, including permanent supportive housing units.
- **Home Repair Services:** As a regional nonprofit home repair organization, Home Repair Services of Kent County supports the efforts of all three jurisdictions by providing minor home repairs and accessibility improvements throughout Kent County.
- **Homeless services:** The Continuum of Care and the Kent County Essential Needs Task Force place a high priority on promoting communication, coordinating efforts, interagency collaboration and identifying and addressing gaps in services.

#### *Gaps in the delivery system*

- Job training and job readiness: Job training agencies, representing concerns of employers, noted a number of gaps and challenges:
  - Relatively low local wages create a challenge for retention of persons who have completed local job training programs;
  - Many trainees need at least 6-9 months of job readiness and skills training, but they don't have resources to support themselves during a long training program;
  - Many potential trainees lack transportation to get to training, which has generally been regionalized;
  - Job training is built around the skills needed by employers, and is not necessarily well-connected to the interests of trainees.
- Neighborhood Associations: Grand Rapids neighborhood associations identified crime prevention, blight reduction, and the cultivation of more mixed-income homeownership opportunities as priorities.
- Supportive Housing Developers: Nonprofit organizations providing supportive housing noted that their residents frequently lack immediate 24/7 access to supportive services needed to maintain their housing.
- Grand Rapids neighborhood organizations identified a need for continuing leadership training and increased financial support in their efforts to build neighborhood leadership and cohesion.
- Multi-Cultural Supportive Services: Rapidly increasing populations of Hispanic and other cultural groups create a need for a range of supportive services provided through culturally sensitive programs and organizations.
- Youth Services: In an online survey (undertaken as part of the consolidated plan process), 79 percent of 1,970 respondents from throughout Grand Rapids, Wyoming, and Kent County expressed a high or moderate need for youth services.
- PHAs: The public housing authorities of Kent County noted a continuing and increasing difficulty finding rental units at the local HCV payment standards.
- Kent County local governments: Subrecipients expressed a need for a range of local services and infrastructure improvements, but also expressed difficulty in delivering complex projects.
- Infrastructure Development: Public agencies noted gaps in transit routes and hours, lack of pedestrian connections connecting transit stops to suburban employers, and the need for greater disaster resilience in the areas of flood management education and infrastructure.

Through the institutional delivery structure identified above, and other associated agencies and service providers, a range of services targeted to homeless persons and persons with HIV are available within the community, as shown below. Availability of services targeted to homeless persons and persons with HIV and mainstream services include:

**Table 5.6: Homelessness Prevention Services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics	X (medical outreach)	X (medical outreach)	
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care	X		
Education	X	X	
Employment and Employment Training	X		
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X		
Mental Health Counseling	X	X	X

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Transportation	X		

**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 homeless service delivery system 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. There are options for individuals, families with children, veterans and their families, and unaccompanied youth.

**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 system employs a *housing first* strategy, maximized together through its 2-1-1 referral and the Coordinated Assessment system to refer clients to appropriate services. Service providers offer a wide range of housing types for those experiencing homelessness and there are many opportunities to provide supportive services on-site. Focus groups indicated that the gaps in homeless services include, but are not limited to, emergency and outreach services for youth, supportive services such as mental health and substance abuse services available around the clock (not just during normal business hours), case management and mental health services. Focus group participants also noted that the emergency shelter system is often at its maximum capacity and that permanent supportive housing options are often full as well. This makes it difficult for people to be housed both coming off of the street and when they are ready to transition from a temporary housing situation into a more permanent one.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Strategies for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs include, but are not limited to:

- Encourage mixed-income neighborhoods, including support for neighborhood leadership and CHDO efforts to expand opportunities for affordable homeownership;
- Encourage the development of affordable rental housing, including units dedicated for permanent supportive housing
- Expand opportunities for transit-oriented development to increase living opportunities connected to jobs and services;
- Continue collaboration to address job training and job readiness needs;
- Strengthen incentives and streamline policy for affordable housing development, including implementation of actions identified in Grand Rapids' plan *Great Housing Strategies: Addressing Current and Future Housing Needs*;
- Explore ways to encourage the expansion of transit opportunities to support access to jobs and services for low-income households;
- Increase access to rental housing assistance to ensure permanent housing with supports sufficient to ensure success appropriate for the needs of homeless and disabled persons.



## Goal 2: Increase the Supply of Affordable Housing

Create affordable housing through new construction and rehabilitation for homeowners and renters, including permanent supportive housing.

### Priority Needs

1. Affordable rental housing
2. Affordable owner housing
3. Permanent supportive housing

<b>Start Year</b>	2016	<b>Outcome</b>	Affordability	<b>Category</b>	Affordable Housing				
<b>End Year</b>	2020	<b>Objective</b>	Provide decent affordable housing	<b>Target Area(s)</b>					
<b>Goal Outcome Indicator</b>				<b>GOI Quantity</b>			<b>Funding</b>		
				<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>	<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>
<b>Rental units constructed</b>				24	5		CDBG:	CDBG:	CDBG:
<b>Homeowner Housing Added</b>				13	20		HOME: \$2,474,023	HOME: \$2,801,210	
							ESG:	ESG:	

### Goal 3: Improve Access to and Stability of Affordable Housing

Increase opportunities for housing stability through homebuyer down payment assistance, tenant based rental assistance and other support; fair housing education and enforcement, legal assistance for housing matters, and financial/homeownership counseling.

Assist homeless individuals and families to stabilize in permanent housing after experiencing a housing crisis by providing client-appropriate housing and supportive service solutions; provide homeless households with financial and other assistance to move them as quickly as possible into permanent housing.

#### Priority Needs

1. Access to and stability of affordable owner housing
2. Access to and stability of affordable rental housing
3. Fair housing education and enforcement and housing consumer services
4. Supportive services for formerly homeless and persons with special needs to remain in their housing
5. Prevention of homelessness
6. Regional response to addressing housing instability or homelessness

<b>Start Year</b>	2016	<b>Outcome</b>	Availability/accessibility	<b>Category</b>	Affordable Housing and Homeless				
<b>End Year</b>	2020	<b>Objective</b>	Provide decent affordable housing	<b>Target Area(s)</b>					
<b>Goal Outcome Indicator</b>				<b>GOI Quantity</b>			<b>Funding</b>		
				<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>	<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>
<b>Direct Financial Assistance to Homebuyers (Households Assisted)</b>				20			CDBG: \$300,000	CDBG: \$200,000	CDBG:
<b>Tenant-based rental assistance /Rapid Rehousing (Households Assisted)</b>				4,000	100		HOME: \$1,950,000	HOME:	
<b>Public service activities other than Low/Moderate-Income Housing Benefit (Persons assisted)</b>				890	1500	40	ESG: \$1,462,471		
<b>Homelessness Prevention (Persons Assisted)</b>				3,900					

### Goal 3: Improve Access to and Stability of Affordable Housing

<b>Housing for Homeless added (Household / Housing Units)</b>						
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### Goal 4: Reduce Blight and Code Violations

Improve public health and safety, reduce blighting influences, and improve property values through code enforcement and clearance of blighted structures or structures in flood-prone areas.

#### Priority Needs

1. Effective response to housing and other code violations in neighborhoods
2. Clearance of blighted structures

<b>Start Year</b>	2016	<b>Outcome</b>	Sustainability	<b>Category</b>	Affordable Housing and Non-Housing Community Development				
<b>End Year</b>	2020	<b>Objective</b>	Create suitable living environment	<b>Target Area(s)</b>					
<b>Goal Outcome Indicator</b>				<b>GOI Quantity</b>			<b>Funding</b>		
				<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>	<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>
<b>Housing Code Enforcement/ Foreclosed Property Care (Household / Housing Units)</b>				25,737		47,045	CDBG: \$5,852,664	CDBG: \$120,000	CDBG: \$300,000
<b>Buildings Demolished (Buildings)</b>					6	15	HOME:	HOME:	
							ESG:	ESG:	

### Goal 5: Increase Civic Engagement and Public Safety

Supports: 1) quality of life and sense of community in neighborhoods by decreasing or preventing crime; 2) neighborhood leadership and civic engagement as the means to build great neighborhoods; and 3) disaster mitigation and planning activities that maintain and improve quality of life.

#### Priority Needs

1. Neighborhood and commercial district public safety improvements
2. Increase neighborhood leadership and civic engagement
3. Planning and public education to mitigate flooding and other natural disasters

<b>Start Year</b>	2016	<b>Outcome</b>	Sustainability	<b>Category</b>	Non-Housing Community Development				
<b>End Year</b>	2020	<b>Objective</b>	Create suitable living environment	<b>Target Area(s)</b>	Grand Rapids: all STAs				
<b>Goal Outcome Indicator</b>				<b>GOI Quantity</b>			<b>Funding</b>		
				<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>	<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>
<b>Public service activities other than Low/Moderate-Income Housing Benefit (Persons assisted)</b>				378,757		3,000	CDBG: \$1,890,000  HOME:  ESG:	CDBG:  HOME:  ESG:	CDBG: \$100,000

### Goal 6: Enhance Infrastructure and Public Facilities

Enhance publically-owned facilities and infrastructure that improves the community and neighborhoods, such as parks, streets, sidewalks, streetscapes and other public infrastructure and facilities, including improving accessibility to meet American with Disabilities Act (ADA) standards.

#### Priority Needs

1. Public infrastructure and facility improvements, including disaster mitigation
2. Accessibility improvements to public infrastructure and facilities

<b>Start Year</b>	2016	<b>Outcome</b>	Availability/accessibility	<b>Category</b>	Non-Housing Community Development				
<b>End Year</b>	2020	<b>Objective</b>	Create suitable living environment	<b>Target Area(s)</b>	Grand Rapids: All STAs				
<b>Goal Outcome Indicator</b>				<b>GOI Quantity</b>			<b>Funding</b>		
				<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>	<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>
<b>Public Facility or Infrastructure Activities other than Low-/Moderate-Income Housing Benefit (Persons Assisted)</b>				8,000	63,340	15,000	CDBG: \$1,000,000	CDBG: \$2,867,768	CDBG: \$50,000
<b>Public Facility or Infrastructure Activities for Low-/Moderate-Income Housing Benefit (Households Assisted)</b>							HOME:	HOME:	
							ESG:	ESG:	

## Goal 7: Increase Access to Jobs, Education and Other Services

Increase access to jobs, education, health and wellness, recreation, and health and social service activities.

### Priority Needs

1. Access to public services, including services for youth, seniors, persons with disabilities, and persons from diverse cultures
2. Transportation services to improve access to jobs and services
3. Supportive services appropriate for persons for whom English is a second language
4. Emergency and outreach services for youth

<b>Start Year</b>	2016	<b>Outcome</b>	Availability/accessibility	<b>Category</b>	Non-Housing Community Development and Non-Homeless Special Needs				
<b>End Year</b>	2020	<b>Objective</b>	Create suitable living environment	<b>Target Area(s)</b>					
<b>Goal Outcome Indicator</b>				<b>GOI Quantity</b>			<b>Funding</b>		
				<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>	<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>
<b>Public service activities other than Low/Moderate-Income Housing Benefit</b>				150	44,098	250	CDBG: \$100,000	CDBG: \$1,006,926	CDBG: \$250,000
							HOME:	HOME:	
							ESG:		

## Goal 8: Increase Economic Opportunities

Enhance economic stability and prosperity by increasing economic opportunities for residents through job readiness and skill training, promotion of entrepreneurship (including among culturally diverse populations), façade improvements, and other strategies.

### Priority Needs

1. Improved access to jobs
2. Access to job training and job readiness training
3. Job creation
4. Commercial building improvements
5. Improved economic opportunities for culturally diverse populations and business sectors

<b>Start Year</b>	2016	<b>Outcome</b>	Availability/accessibility	<b>Category</b>	Non-Housing Community Development				
<b>End Year</b>	2020	<b>Objective</b>	Create economic opportunities	<b>Target Area(s)</b>					
<b>Goal Outcome Indicator</b>				<b>GOI Quantity</b>			<b>Funding</b>		
				<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>	<i>Grand Rapids</i>	<i>Kent County</i>	<i>Wyoming</i>
<b>Jobs created/retained (Jobs)</b>							CDBG: \$250,000	CDBG:	CDBG: \$25,000
<b>Businesses assisted (Businesses Assisted)</b>							HOME:	HOME:	
<b>Public service activities other than Low/Moderate-Income Housing Benefit (Persons Assisted).</b>				200		25	ESG:		
<b>Public Facility or Infrastructure Activities other than Low/Moderate-Income Housing Benefit (Persons Assisted)</b>									
<b>Facade treatment/business building rehabilitation (Businesses)</b>									

**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)**

All three jurisdictions anticipate creating, preserving or rehabilitating affordable housing that will be made available to the following number of low-income, low-income, and moderate-income families during the five year consolidated planning cycle:

- Grand Rapids: 2,098 Households
- Kent County: 570 Households
- Wyoming: 360 Households

## **PUBLIC HOUSING ACCESSIBILITY AND INVOLVEMENT – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

Section 504 Voluntary Compliance Agreements are not required in the Kent County, Grand Rapids, Wyoming or Rockford Housing Commissions. Efforts by the local PHAs to identify accessibility needs of public housing residents are described in the Needs Assessment section of the plan.

### **Activities to Increase Resident Involvement**

Public Housing Commissions link residents with programs and services to help improve economic self-sufficiency. Resident services enrich the lives of community members and empower individuals and families as they strive for economic independence.

#### **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. Residents also participate in a Resident Advisory Board to provide input on the management and administration of the Housing Commission.

The Kent County Housing Commission undertakes several initiatives to increase the self-sufficiency of residents and voucher holders. As part of its Section 8 Housing Choice Voucher program, the Housing Commission operates a Homeownership program that assists voucher holders in their transition to homeownership. The Commission also partners collaboratively with the Wyoming and Grand Rapids Housing Commissions to ensure that residents have access to relevant information about available community services through the Family Self-Sufficiency (FSS) Coordinating Committee. The FSS program aims to move participants from welfare to work by helping families identify barriers to employment and set time bound goals detailing steps they will take to acquire and retain employment. Efforts include partnerships and training through Community Partner agencies that provide homeownership training, life skills training, training and employment programs, credit repair, financial and economic management training. Kent County also

provides direct case management to assist Section 8 clients by offering participation in the Family Self-Sufficiency Program that facilitates transition to the Homeownership Program after successful completion.

Kent County educates landlords on the PHA's program giving them the motivation and support to maintain units with the Housing Commission. The Housing Commission advocates for clients who have problems with property management companies that refuse or are reluctant to honor Section 8 vouchers in Kent County.

### **Grand Rapids Housing Commission**

The Grand Rapids Housing Commission (GRHC) provides housing assistance to extremely low- and low-income residents of Grand Rapids and Kent County, Michigan. The GRHC operates seven low-income housing developments, including family housing and apartments for seniors and disabled persons. The Commission administers federal Section 8 rental subsidy programs, home ownership programs and a transitional housing program. The GRHC has expanded its role in the community, partnering with community organizations and individuals to advocate for positive change in local social welfare policy and to offer supportive services families can use to achieve self-sufficiency and a stronger financial future.

The GRHC has established a Resident Advisory Board, the membership of which represents the residents assisted by the PHA. Resident Advisory Board members meet and advise the GRHC on matters pertaining to administration of various housing programs, capital needs, and necessary resident services. The GRHC provides numerous services and activities to support and encourage public housing residents in assuming economic and social self-sufficiency. These activities, which include but are not limited to, computer training, substance abuse counseling, academic, skill assessment/training and employment programs, and homeownership counseling, take place at various public housing sites.

Through GRHC Resident Services, housing development residents receive access to an array of assistive resources, including:

- On-site social workers provide counseling that links residents with needed health care, mental health care, educational, job training, employment and transportation services.
- On-site food pantries are offered at all housing developments that serve senior citizens and the disabled.
- On-site Senior Meals café offers low-cost midday meal service weekdays at Mount Mercy Apartments.
- “Art at the Mount” initiative supports arts and recreational programs at Mount Mercy Apartments.

- Literacy classes, computer labs, computer training.
- Parenting classes at family housing developments.
- Health fairs, health education and screening, nutrition classes.
- Recreational and social events, programs for children and youth.

### **Wyoming Public Housing Commission**

The Wyoming Housing Commission (WHC) provides rental assistance to extremely low- and very low-income families. The WHC operates a low-rise and scattered site low-income housing development, including family housing and apartments for seniors and disabled persons. The Commission issues and administers Section 8 Housing Choice Rental Assistance Vouchers.

The WHC takes actions to encourage participants to work toward homeownership and to participate under the Family Self-Sufficiency (FSS) program. The FSS program enables the Housing Choice Voucher program and also assists public housing residents to increase their earned income and reduce their dependency on welfare assistance and rental subsidies. The FSS program provides low-income families with educational opportunities, job training, counseling and other forms of social services, while living in assisted housing. The FSS program assists participants in obtaining skills necessary to achieve self-sufficiency.

The Residents' Advisory Board reviews the agency's annual plan and provides input on the administration and management decisions of WHC.

### **Rockford Housing Commission**

The Rockford Housing Commission encourages residents to participate in the Residents' Advisory Board (RAB). The Rockford Housing Commission considers the input of the RAB to inform management and administrative decisions related to resident services, capital improvements and other matters, as presented to the RAB.

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**Is the public housing agency designated as troubled under 24 CFR part 902?**

The Kent County, Grand Rapids, Wyoming and Rockford Public Housing Commissions are not identified as troubled by HUD.

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**Plan to remove the 'troubled' designation**

N/A

## **BARRIERS TO AFFORDABLE HOUSING – 91.215(H)**

### **Barriers to Affordable Housing**

Barriers to affordable housing may be presented to low-income households by market conditions; these barriers (scarcity of affordable rental housing, slow income growth, etc.) have been presented in the market analysis. In addition, the jurisdictions undertake efforts to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing. The Analyses of Impediments to Fair Housing Choice (AI) studies for Kent County, Grand Rapids and Wyoming identify impediments to fair housing that also fall under the category of barriers to affordable housing. The following information includes impediments identified by each jurisdiction and the corresponding Action Items documented to address these impediments. Each jurisdiction reports on the progress in addressing these impediments and barriers to affordable housing in annual reporting documentation required by HUD.

### **Kent County**

The following strategies and action items are recommended to address specific barriers to affordable housing in Kent County as identified in the AI.

#### **Increase Access to Affordable Housing Opportunities**

Community opposition, including “NIMBYism”, adversely affects the availability of housing for low-income families, persons with disabilities, homeless persons, or lower-income minorities and is one of the primary barriers the County identified to affordable housing.

The attitude of local government officials, public pronouncements of general policy, and careful planning and implementation of individual housing efforts by providers are key aspects for overcoming this opposition. In addition, contextual planning of new affordable housing with relationship to scale, size, density and architectural character of the neighborhoods where it will be located is vital to integration and success.

Action items:

- Provide rehabilitation programs, particularly to elderly residents who are unable to perform basic maintenance and upkeep.

- Continue to receive referrals from the Health Department for homeowners needing assistance with housing-related health and safety violations.
- Ensure that minimum accessibility standards are being adhered to through strict enforcement of building codes.
- Incorporate visitability standards into Kent County HOME new construction guidelines to increase the number of visitable units in the community.
- Support local units of government in requiring that bank-owned properties are adequately maintained to ensure safety of surrounding neighborhoods.
- Identify public-private partnerships to implement housing choice strategies — housing rehabilitation services, financial institutions, etc.

**Continue to work with an organization or agency to provide fair housing services to the County**

The County contracts with local partners and providers to address impediments to fair housing in Kent County based on needs identified in the prior year. These contracts provide a baseline service to ensure that fair housing issues are addressed and protected classes have access to affordable housing. Recently, these providers have decreased the number of fair housing test cases.

Action Items:

- Determine if additional funding is available and should be targeted to increase housing testing
- Work with service providers to include religion and age discrimination in information programming
- Work with service providers to expand enforcement and testing in rural areas of the County

**Research whether a Countywide Fair Housing Ordinance would be an effective tool to increase fair housing outcomes in Kent County**

Kent County does not currently have a Fair Housing Practices Ordinance. Although the County adheres to Federal and State regulations regarding fair housing, providing locally based regulations allows for an additional layer of enforcement while also allowing the opportunity to add additional standards or customized regulations to the Federal requirements to better promote access to fair, affordable housing. To better understand the context for a potential local ordinance, the County has identified the following action item:

Action Item:

- Continue to seek ways to identify the linkages between fair housing choice and resident’s access to quality education, health care, and jobs.

**Continue involvement in Regional Planning Groups**

A significant constraint the County faces is that there is no comprehensive or centralized planning organization within the County that oversees planning activities for the 30+ municipalities within it. There is also no Master Plan for the County. Such an organization and such a plan would be able to set forth a vision for appropriate locations for employment centers, high density development, transportation networks, etc. Instead, communities are left to provide fair housing on their own.

Action Items:

- Explore opportunities to develop a Regional Housing Plan for Kent County with strategies and objectives for providing affordable housing throughout the County.
- Coordinate with Grand Valley Metro Council (GVMC) and Michigan State University Cooperative Extension to incorporate housing recommendations into broader regional policies and growth plans.
- Encourage mixed use development to provide opportunities for people to live near work and provide greater transportation benefits.

**Promote County-wide Source of Income Protection**

The cities of Grand Rapids, Kentwood, and Wyoming have source of income protection requirements, meaning that landlords cannot discriminate based on income, including Section 8 or other housing vouchers. No other communities in the County have this requirement. Practices underlie the difficulties finding affordable housing in communities that place a stigma on assisted housing. With source of income protection, where vouchers are treated equally as cash, residents using this aid are free to live anywhere within the community. This can result in broader acceptance of diversified housing and mixed-income development and lessen the stigma in place in many communities.

Action Items:

- Explore the establishment of source of income protection throughout the County.
- Promote broader acceptance of vouchers and development of affordable housing county-wide through public information on the facts about Housing Choice Vouchers and their purpose.
- Attend at least one meeting of the Regional Property Managers Association annually to provide a point of reference for property owners who may or may not be participating in the program.

**Cooperate with public/private institutions to provide better access to aid and financing through continued participation in local task forces**

The County shall continue to review current policies and procedures regarding private sector (e.g. banking, financial institutions, real estate brokers, and insurance companies) practices to mitigate actions that appear to discriminate or otherwise contribute to restricted housing choice.

Action Items:

- Facilitate tracking of financing disparities through download and analysis of annual Home Mortgage Disclosure Act (HMDA) data.
- Seek Spanish-speaking fair housing educators to address changing demographics and assist with all aspects of home ownership/rental requirements.
- Continue to support the work of the Fair Housing Center of West Michigan in educating local lenders on fair lending practices, local trends and best practices in the lending industry.

**Further explore Rental Registration and Landlord Training Program**

Between new investment opportunities created by the increased rate of foreclosures and the ease of access to information provided by the internet, new landlords and property managers are entering the market. These landlords often lack the proper training and education, particularly in regards to fair housing, to avoid violations. These violations may not be intentional, but they are made.

Action Items:

- Identify the objectives of rental registration and potential impacts and cost of implementation.
- Where rental inspections are currently taking place, conduct adequate follow up on violations, particularly on egregious offenders who own multiple properties in low-income neighborhoods.
- Continue to support housing inspection efforts of the Health Department and housing rehabilitation for units identified through housing inspection activities.

**Grand Rapids**

As demand for housing downtown and in neighborhoods continues to increase, Grand Rapids is committed to ensuring quality housing and housing choice is available for everyone choosing to live in the city. In April 2015, more than 200 people representing nonprofit and for-profit housing developers, lenders, neighborhoods, educational institutions, human service agencies, local philanthropy, and state and local government participated in a community conversation about Grand Rapids housing. While many positive factors were identified such as a strong real estate market, high demand for housing, good quality housing stock and significant downtown investment, concern was expressed about the availability of affordable housing, high housing demand driving rental rates upward, development causing displacement in neighborhoods, and wages not keeping up with the cost of living. Participants believed future housing development and redevelopment should focus on creating a variety of housing types at a variety of price points; support diversity of race, ethnicity, and incomes; and be conveniently located near public transportation with access to good paying jobs.

As part of a six-month process, four workgroups organized around the topics of Land Use and Zoning, Housing Finance, Economic and Workforce Development, and Low-Income and Vulnerable Populations. This work resulted in the Great Housing Strategies plan that identifies the eight goals listed below and thirty-five specific actions to address housing issues. The entire plan is available for review at [www.grcd.info](http://www.grcd.info).

- 1) Provide a variety of housing choices
- 2) Encourage mixed-income neighborhoods
- 3) Create and preserve affordable housing

- 4) Support low-income and vulnerable populations
- 5) Support employers and workforce development
- 6) Encourage alternative transportation and parking options
- 7) Change public perception of affordable housing
- 8) Advocate for change to state and federal policies

The Grand Rapids City Commission adopted the plan in December 2015 to serve as the framework for building public-private partnerships, establishing policy, and creating programs to address current and future housing needs in Grand Rapids. Since being adopted by the City Commission in December 2015, some zoning ordinance changes have taken place along with changes in local economic development policies for Neighborhood Enterprise Zone, Obsolete Property Rehabilitation, and Brownfield Development programs.

### **Wyoming**

The following strategies and action items are recommended to address specific barriers to affordable housing in Wyoming as identified in the City's current Analysis of Impediments. The City's AI is hereby incorporated into this plan by reference. Such strategies and action items are listed in no particular order.

#### **Banking, Finance and Insurance**

Heightened scrutiny by lenders since the 2008 recession prevents many would-be buyers from entering the owner housing market. For those who do enter the owner housing market due to lower real estate prices, households may not have a full understanding of the costs - financial and otherwise - of homeownership.

Action Items:

- The City should work with social service agencies, MSU Extension, local school districts, secondary education providers and lending institutions to encourage their work with families who seek to better their housing situation by offering free or reduced-cost financial literacy tools and estate planning.

- Work with social service agencies and lending institutions to create a "home network" to act as a local clearinghouse for all housing programs (rental housing, owner housing, senior housing) so that housing seekers are matched with the best option for their needs and desires.

### **Private Housing and Development Incentives**

Vacant buildings can remain undeveloped because it is cheaper for investors, speculators, and slumlords to informally “land-bank” — that is, to sit on vacant, often blighted buildings. Due to the existing housing stock, there are fewer opportunities for mixed-income housing developments/neighborhoods.

#### **Action Items:**

- Develop local incentive programs for infill and mixed-income housing.
- Conduct a study of vacant property to market redevelopment sites within the City, promoting that sites are vacant and are ripe for redevelopment.
- Create a program to assist with the demolition of obsolete buildings in exchange for the redevelopment of the site.
- Incentivize multi-family redevelopment sites, including renter and owner housing options, within walking distance (1/4 mi.) of existing commercial and employment centers.

### **Public Bodies and Boards**

A review of the Planning Commission, Zoning Board of Appeals, Downtown Development Authority, Community Development Committee and Housing Commission members indicates that a majority of members are male and live south of 28th Street.

#### **Action Item:**

- As terms expire, City Council should seek to ensure that the selection of Board/Commission members is more balanced by gender, race, ethnicity, and geography so that different aspects of the community are represented.

### **Subsidized Housing and Cost of Living Assistance**

Some individuals may not be aware that public, subsidized or cost of living assistance may be available to them.

#### Action Items:

- Assist and support non-profit and community groups in their efforts to assist low-income families in finding quality, affordable housing, and also in their efforts to provide cost of living assistance.
- Ensure that information on the resources available to help residents with the costs of housing is available, including using TV, radio, internet, and social media, in addition to more traditional forms of outreach.
- Proactively assist homeowners in using the Community Foreclosure Response Toolkit.

#### Action Item:

- Leverage the resulting development pressure to incentivize mixed-income transit-oriented developments with dense housing typologies that allow a wide variety of community member's access to transportation opportunities.

Ongoing programs to assist homeowners with home renovations have been successful in improving housing quality.

#### Action Item:

- Continue to support home renovation assistance programs for homeowners.

### **Housing Discrimination and Laws**

Available data used in the City's Analysis of Impediments indicate that the gay, lesbian, bisexual and transgendered population faces housing discrimination in the State of Michigan due to a lack of laws protecting them from such discrimination.

#### Action Item:

- Consider amending the City of Wyoming's Fair Housing Ordinance to prohibit housing discrimination on the basis of sexual orientation and gender identity.

A review of discrimination complaints and fair housing testing reveals that the City may have instances of housing discrimination within rental housing and discriminatory advertising based on race, national origin and familial-status (presence of children under the age of 18.)

Action Item:

- Consider encouraging landlords of residential rental properties to receive fair housing training or require them to self-train on fair housing laws and regulations and submit proof to the City. Such training is offered by the City of Wyoming in conjunction with the Fair Housing Center of West Michigan as funded by the City of Wyoming.

Information from the focus groups indicates that banking institutions, in an attempt to "triage and sell" the oversupply of homes, invested in selling properties in higher income, higher value and whiter neighborhoods. Homes in lower income, lower value and minority neighborhoods sat vacant and were not maintained or secured.

Action Item:

- Increase code enforcement on trouble properties, regardless of ownership status or vacancy status. Create a fund specifically for maintaining vacant and unsecured lots.

### **Land Use and Zoning**

Data found in the AI community survey indicates that residents want to live in single-family homes in the southern and western neighborhoods. Reasons cited included proximity to M-6, newer homes, Grandville Public Schools, and being close to shopping and workplaces. Regardless of housing price and type, different portions of the City should have a variety of housing types and price points.

Action Items:

- Provide information and resources to help developers make use of existing State and Federal incentives for infill development and mixed-income housing.
- Streamline processes and procedures, where applicable, to ensure that zoning and building regulations are not an impediment to redevelopment.

- Require new housing developments to set aside a certain percentage of housing units for low- to moderate-income households.
- Consider promoting the development of accessory dwelling units as a means to provide increased housing options.
- Create a mixed-density residential zoning district adjacent to the City's commercial and planned commercial corridors.
- Allow higher density development along Division Ave. as a means to capitalize on the Bus Rapid Transit.
- Implement zoning incentives, such as density bonuses or relaxed dimensional standards, for mixed-income housing and/or community amenities.

The City's Zoning Ordinance requires that in the event that three or more unrelated parolees live together, they are only permitted to live in the Industrial Zoning District. This appears to be the only residential use that is required to locate in an Industrial Zoning District.

Action Item:

- The City should consider the status of congregate living facilities for parolees and allow such facilities to be permitted in other zoning districts. Housing for parolees should be held to the same standard as other congregate living facilities.

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### **Strategies to Remove or Ameliorate the Barriers to Affordable Housing**

Action steps to remove or ameliorate the barriers to affordable housing are listed above following each impediment to fair housing choice. Other strategies related to market conditions are included in the recommendations in such recent housing needs assessment and planning documents as the Grand Rapids *Great Housing Strategies: Addressing Current and Future Housing Needs* (2015), *the City of Wyoming Housing Needs Assessment* (2013), and the forthcoming *Assessment of Grand Rapids and Kent County Vision to End Homelessness*, commissioned by local foundations.

## HOMELESSNESS STRATEGY – 91.215(D)

As stated in the Grand Rapids Area Coalition to End Homelessness’ (Coalition) Governance Charter, “The goal of the Coalition is to prevent and end systematic homelessness in the greater Grand Rapids area, guided by the values and philosophy set forth in the community’s initial 10-year plan to end homelessness, the *Vision to End Homelessness*.” The Coalition serves as the Continuum of Care (CoC) for the Grand Rapids, Wyoming and Kent County area.

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

#### Coordinated Assessment

In August of 2014, the Coalition adopted the Centralized Intake Committee Coordinated Assessment (CA) and Referral System Policy and Procedures. The Salvation Army is the designated Centralized Intake Agency that manages the Coordinated Intake and Housing Assessment Program (HAP). The steps are outlined in Figure 5.1 and further defined below:

**Figure 5.1: Coordinated Assessment and Referral System**



Source: Grand Rapids Area Coalition Centralized Intake Committee Coordinated Assessment and Referral System Policy and Procedure document.

**Access:**

An individual or family household can access the CA system in several ways – through contact with 211, a designated Outreach Agency or a designated Referral Agency. A quick screen determines homeless status. If the individual or family is determined to be homeless, a referral is made to the Salvation Army– the designated Centralized Intake Agency.

**Assessment:**

Once the HAP verifies homeless status, a Housing Management Information System (HMIS) Assessment is completed. Households who are homeless due to domestic violence may be referred to the Domestic Crisis Center. Households at risk of homelessness are referred to Prevention/Diversion resources. Those who meet the definition of homelessness are assessed using a Service Prioritization Decision Assistance Tool (SPDAT) and are referred to temporary housing. For those households that receive a pre-screen score of five or more, a full SPDAT is conducted within approximately two weeks. Homeless status is determined using the HUD Definition of Homelessness as defined in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Regulations. The Categories 1, 2, and 4 are approved for use and in special circumstances, other funder definitions or requirements may also be used.

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**Addressing the emergency and transitional housing needs of homeless persons**

Homeless facilities and services are managed and provided through agencies that participate in the Continuum of Care and special needs service agencies (listed in Appendix D). These agencies provide several types of housing including:

- Emergency shelter for families, adult individuals, and youth
- Transitional housing for families and adult individuals
- Permanent supportive housing for adult individuals
- Rapid re-housing for families and adult individuals

The homeless and at-risk of homelessness definitions are aligned with the HUD definitions included in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. HUD published the final rule in the December 5, 2011 *Federal Register* and identifies the following categories:

- An individual or family who lacks a fixed, regular, and adequate nighttime residence;
- An individual or family who will imminently lose their primary nighttime residence;
- Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who qualify for participation in a Runaway and Homeless Youth or related program;
- Any individual or family who is fleeing or attempting to flee domestic violence.

Addressing the needs of the homeless population (homeless individuals, homeless families with children, and the related sub-populations) continues to be a priority within Kent County. Sub-populations include veterans, chronically homeless, families, youth, domestic violence victims, older adults, single adults and individuals re-entering homelessness.

Emergency shelter beds and transitional housing units are available in the community. Emergency shelter and transitional housing programs are encouraged to employ the least restrictive eligibility requirements to prevent large numbers of families from becoming ineligible. Employing the Housing First approach, the Coalition seeks to rapidly move homeless persons into permanent housing. The Coalition prioritizes increasing the availability of permanent housing through rapid re-housing, permanent supportive housing, and housing choice vouchers. The Coalition is focusing on the following to address emergency and transitional housing needs:

**Emergency Shelters:** Emergency shelters are specifically dedicated to the provision of safe and decent short term/crisis housing. Emergency shelter is typically provided in a group setting for not more than 30 days; occasionally stays up to 90 days may occur.

**Transitional Housing:** Transitional housing is dedicated to the provision of safe and decent temporary housing, with the intent to engage the resident in supportive services that assist a return to permanent housing. Transitional housing may be provided in scattered site or group units for a maximum of 24 months.

**Permanent Supportive Housing:** Permanent supportive housing is linked with long-term supportive services and provides permanent housing for persons exiting homelessness. Permanent supportive housing may be provided through a variety of housing models (e.g. scattered site, congregate), but generally incorporates the following characteristics:

- Residential unit are self-contained with a full, private bathroom. These may be ‘efficiency’ units but would still have a kitchen or kitchenette with a stove, refrigerator, sink and countertops;
- Dwelling units are rented with a year-to-year tenant lease;

- While permanent supportive housing provides easy access to services for residents, services are provided as an opportunity for support, and not as a condition of tenancy; and
- While units may occasionally be rented to up to two unrelated adults, they are generally rented to a single individual or household.

In addition to the categories of homeless persons described from the HEARTH Act (above), additional populations eligible to reside in permanent supportive housing include:

- Chronically homeless persons: A person who is “chronically homeless” is an unaccompanied homeless individual with a disabling condition, or a family with at least one adult member who has a disabling condition, who has either been continuously homeless for a year or more OR has had at least four (4) episodes of homelessness in the past three (3) years.”
- Persons with special needs: An adult person/prospective tenant with a physical (including profound deafness and legally blind), mental or emotional impairment that is of long-term duration, and, at the same time, the tenant must have a *substantial and sustained* need for supportive services in order to successfully live independently, including persons receiving SSI/SSDI.

**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 Coalition’s primary focus is access to affordable, quality permanent housing as a path to ending homelessness. The dangers inherent in any person remaining unsheltered are such that the community must work to ensure all persons in need are able to secure safe shelter that accommodates them and their family appropriately.

Homeless households are encouraged to obtain an assessment and linkage to available services to help resolve their housing crisis through the community's central intake. The Coalition coordinates with major systems (Community Mental Health, Jail, Department of Health and Human Services, health care providers, etc.), which assist with outreach efforts by publicizing the role of the coordinated assessment and providing referral to other organizations when appropriate. Outreach staff is strategically placed in the

community to ensure homeless or at-risk households with dependent children are aware of community resources to prevent or end homelessness.

The Housing Assessment Program will continue to assess at-risk households with children to prevent homelessness by using available prevention resources, shelter diversion tactics, and linkage to mainstream resources to avoid loss of housing. An intake specialist will work with each household to create a plan to resolve the housing crisis. The Coalition will target prevention and diversion resources to those most closely matching the current homeless population profile, ensuring resources are used for those most likely to become homeless. The Coalition will work collaboratively with mainstream systems (e.g. schools, child protective services and mental health systems) to identify at-risk households and connect them to appropriate prevention resources. The Coalition is committed to expanding permanent supportive housing for the chronically homeless population.

### **Coalition to End Homelessness Goals**

The Continuum of Care's 2015-2017 Action Plan to End Homelessness identifies the following specific goals that aim to end homelessness:

- 1) End Veteran Homelessness by the end of 2017
- 2) End Chronic Homelessness by the end of 2017
- 3) End Youth and Family Homelessness by 2020
- 4) Lay the pathway to end all homelessness in Kent County by 2020

Further, the Action Plan identifies the following seven performance indicators that focus on decreasing the number of homeless people, the number of times households experience homelessness, and the causes of homelessness:

- 1) Reduction in the number of households experiencing homelessness
- 2) Reduction in the number of unsheltered households
- 3) Reduction in the length of time the households experience homelessness
- 4) Reduction in the number of times households experience homelessness
- 5) Increase in the percentage of households exiting to permanent housing

- 6) Improvement in the employment rate and incomes for program participants
- 7) Increase in the number of units dedicated to chronically homeless

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income 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**

Homelessness prevention efforts will continue to focus largely on access to mainstream resources to assist families with various barriers to permanent housing. Collaboration with mainstream providers such as the Department of Health and Human Services, which oversees Temporary Assistant for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), and Medicaid eligibility, continues to support effective and efficient access to mainstream benefits by eligible participants.

The Coalition is making substantial strides in securing income and benefits for the most vulnerable citizens by improving implementation of the SSI/SSDI Outreach, Access and Recovery (SOAR) Program. Pine Rest Christian Mental Health Services, as the designated SOAR Lead Agency, coordinates with other service providers through its Street Reach program to ensure those with disabling conditions avoid housing crises. Local housing providers will continue to assist participants in establishing linkages to mainstream resources in order to sustain housing on a long-term basis.

The Coalition supports protocols established by the Michigan Department of Health and Human Services to help prevent youth aging out of foster care from being discharged into homelessness. With changes in policy for youth at the state level, greater flexibility ensures youth are not routinely discharged to homelessness. Youth are able to remain in foster care beyond age eighteen, and youth that have aged out of foster care are eligible to return voluntarily if they need additional support.

Since December 2011, network180, the Community Mental Health Authority in Kent County, has been working with the Community Medicine Division at Spectrum Health Systems to implement the Center for Integrative Medicine (CIM). The CIM is designed to provide comprehensive evaluation, intervention and stabilization of physical and behavioral health issues for Spectrum patients who have frequented the emergency room ten or more times in the prior twelve months. Program evaluation includes attention to social determinants of health, which includes housing.

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 re-entry 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.

Preventing homelessness from occurring at all is the most effective means to avoid trauma to families and the creation of larger barriers which might prevent the household from moving forward successfully. While reducing the duration and rate of return to homelessness, the community must also support efforts to ensure households will remain securely and safely housed.

#### **Work with other systems to prevent homelessness**

The Coalition continues to reach out to other systems to prevent homelessness by:

- Working with Prisoner Reentry to improve permanent housing outcomes within the Michigan Department of Corrections Prisoner Reentry program.
- Reducing homelessness for persons exiting foster care by working with member group Fosters Forward.
- Making housing plan assistance training available to discharge planners across systems.

## 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 cities of Grand Rapids and Wyoming all 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 and the Kent County Health Department have been partnering with the Healthy Homes Coalition of West Michigan and its “Get the Lead Out!” Home Repair program. Their work together since 2001 has addressed lead hazards in over 1,500 homes in the City of Grand Rapids and contributed to substantial reductions in the incidence of lead poisoning among children in Grand Rapids and throughout Kent County. The City intends to pursue funding opportunities for lead-based paint hazard remediation and other Healthy Homes Initiatives in the next five years in continued partnership with the Kent County Health Department and the Healthy Homes Coalition.

Kent County will continue to require environmental reviews of their projects, with particular concern for units constructed before 1978, and provide information regarding the hazards of lead-based poisoning through its Rehabilitation program. Additionally, Kent County’s Rehabilitation Specialist is an EPA Certified Lead Based Renovator.

Likewise, the City of Wyoming’s Building Rehabilitation Specialist is a State of Michigan licensed lead paint inspector and lead risk assessor. For each housing rehabilitation project, the Rehabilitation Specialist identifies the potential lead hazards, develops a plan for remediation and executes the plan for remediation, in compliance with federal standards. The City provides CDBG housing rehabilitation applicants with applicable information of the hazards of lead-based poisoning.

Both national studies and local experience has shown that rental units have a higher prevalence of lead-based paint hazards when compared to owner-occupied units (30 percent and 23 percent, respectively). 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 ten 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 of West Michigan, 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. A Pay for Success model for financing healthy housing interventions is being rigorously pursued with the support of the Green and Healthy Homes Initiative.

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

While lead-based paint was banned in 1978 by the U.S. Consumer Product Safety Commission (CPSC), it is still a significant problem in cities where the housing stock is relatively old and built before the ban. In Kent County, over 59.2 percent of the housing stock was built before 1978.

As indicated in the Housing Market Analysis section, of over 8,000 households under 80 percent of AMI in the County with children under 6, there are roughly 4,800 households with children in the County living in these older homes.

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

Kent County, Grand Rapids and Wyoming have incorporated policies in their federally funded housing and community development programs to properly evaluate and assess the presence of lead based paint in any rehabilitation or other development project.

The City of Grand Rapids maintains a Lead-Safe Housing registry. It lists addresses where lead hazard treatment has been successfully completed. The registry may be viewed through the City's Community Development Department website under Housing Rehabilitation, Lead Safe Housing Registry: [http://www.grcity.us/index.pl?page\\_id=3222](http://www.grcity.us/index.pl?page_id=3222).

## ANTI-POVERTY STRATEGY – 91.215(J)

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

#### **Kent County**

The County's goals, programs and policies for reducing the number of poverty-level families are to support programs that help stretch scarce resources for families and individuals living in poverty. The County uses fifteen percent of its annual CDBG entitlement grant to support services in the community which are designed to increase access to basic services for very low-income individuals. These services include transportation for the elderly and persons with disabilities, youth services, meals for seniors both home-delivered and at congregate dining sites, and support for senior centers that provide information and referral to seniors. In addition, housing programs offered by the County through the CDBG, HOME and other HUD-funded programs assist low-income individuals either directly with housing subsidies or through improvements to their living environment. By improving access to services people can gain the tools they need to meet their daily needs and those of their children. Weatherization services can decrease utility bills leaving funds available for other costs of living. The Kent County Housing Commission addresses alleviation of poverty through its Family Self Sufficiency (FSS) program. Voucher holders voluntarily participate in the FSS program, in which they work with a caseworker to create a personal plan to save money, increase their education and/or job skills and prepare for home ownership. In addition, the Kent County Essential Needs Task Force (ENTF) plays an important role in poverty reduction by addressing such issues as energy efficiency, economic and work force development, nutrition, and transportation (<https://www.accesskent.com/Health/ENTF/default.htm>).

#### **Grand Rapids**

The City itself is limited in the amount of support it can provide for anti-poverty efforts due to limited funding available for social services. While the City is not the lead agency in broad-based anti-poverty efforts, it still has a role in reducing poverty through support and collaboration with community efforts (e.g. Continuum of Care and the Kent County ENTf).

Anti-poverty efforts within the Grand Rapids community are focused on two primary goals: 1) efforts to meet the basic needs of people living in poverty, and 2) efforts to increase the income of those in poverty.

**Basic Needs of People Living in Poverty.** The basic needs of people living in poverty are food and housing. The community provides a well-coordinated food bank system as well as hot meal programs for the homeless and the home-bound. Housing for people in poverty is available, albeit in very short supply.

**Increase Income of People Living in Poverty.** The Grand Rapids community has an extensive array of programs and services designed to assist people in leaving poverty. These include education, employment skills, job training, microenterprise development, and job placement.

As indicated above, the Community Development Block Grant program is not an anti-poverty program, and the City has few resources to directly assist people out of poverty. To the extent however, that CDBG funds are used to support certain housing services, it is contributing indirectly to reducing poverty.

### **Wyoming**

The City's strategy to reduce poverty relies on promoting current and future programs that assist low-income families and senior citizens. The following programs, administered by the City, assist households in poverty by reducing their expenses for such services and/or obligations:

- Community Development Block Grant -Loans at 3 percent annual interest are offered to households with incomes between 50 percent and 80 percent of the area median. Deferred Loans, at zero interest, repaid at a reduced amount, at the time of sale of the property, are offered to households with incomes below 50 percent of the area median.
- Senior Center - Free tax preparation services, free & low cost health and wellness, recreation and leisure, and education programs, free legal consultation services and free medical and blood pressure screenings.
- Poverty Exemptions of Property Taxes -The City allows for an exemption of all or a part of real and personal property taxes to those persons, as determined by the Board of Review, to be in poverty. Wyoming averages about 50 exemptions each year.
- The City's Public Housing and rent certificates programs also provide assistance to poor families.
- Support of The Salvation Army Social Services in administering subsistence payments for short- term rental assistance for low-income persons pending eviction.

The work and programs offered by the City complement and enhance that provided by area nonprofits, school districts and the like in addressing community poverty. These include food and care pantries; education, employment skills, and job training; microenterprise development, and job placement.

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

Overall, the Region’s poverty reducing goals are focused on increasing access to basic services and providing opportunities to increase income and earning power. The Priority Needs identified in this plan and the Strategic Goals that will be addressed during this Consolidated Plan period align with these overall goals to improve services, provide housing, economic development opportunities and improve infrastructure and facilities in high poverty areas.

## 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 are to:

1. Ensure compliance with federal regulations and contract requirements
2. Ensure timely expenditure of grant funds
3. Track CDBG service and LUOG 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 7 working days prior to schedule a 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:

1. Introduction – Staff will meet the Program Manager 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 sub recipient’s 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:

1. Determination Letters should:
2. Contain Findings (with Corrective Actions) and/or Concerns (with Recommendations).
3. If no Findings or Concerns exist Subrecipient should be given formal recognition of a successful program.
4. 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.

5. All monitoring letters must be reviewed and approved by a manager or the director before they are sent to the subrecipient.
6. All monitoring letters must be sent with a signed copy of the monitoring checklist.
7. All correspondence becomes a permanent, written record in the sub recipient'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:

1. 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;
2. 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;
3. 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
4. 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.

### **Subrecipient Monitoring Procedures**

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.

### **Wyoming Monitoring Standards and Procedures**

The Community Development Committee, a citizen body appointed by the Wyoming City Council, ensures that the goals and aims of the CDBG program are upheld. Monthly, the Committee reviews and evaluates prior year's projects and spending; annually, it evaluates grant requests and recommends funding awards to the City Council.

The City of Wyoming contracts with Kent County and the City of Grand Rapids to perform HUD required monitoring of its sub-recipients.

Code enforcement activities are managed by the Inspections Services Supervisor, under the director of the Director of the Community Services.

The Wyoming Rehabilitation Committee, made up of City staff members, oversees the various CDBG housing rehabilitation programs. The City of Wyoming has developed the "Rehabilitation Manual" which describes the available rehabilitation programs, including their purpose, eligibility, funding and other requirements. The Manual also includes guidelines for administration of the overall program, and of specific activities.

The Community Development Administrative Aide, under the director of the Director of Community Services, monitors overall daily program performance and timeliness on a monthly basis.

# Appendix A

Consultation Summary

## Regional Focus Groups and Consultations

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>ACSET</b>	Services - Employment	Market Study Anti-poverty Strategy	Human Services Focus Group
<b>Arbor Circle</b>	Services - Homeless	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs	Homeless Focus Group
<b>Area Agency on Agency of Western Michigan</b>	Services - Elderly Persons	Non-Housing Community Development Strategy	Infrastructure and Transportation Focus Group
<b>Chemical Bank</b>	Other - Bank	Housing Needs Assessment Market Analysis	Affordable Housing Focus Group
<b>City of Grand Rapids Economic Development Dept</b>	Other Government - Local	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
<b>City of Grand Rapids Engineering Dept</b>	Other Government - Local	Market Analysis Non-Housing Community Development Strategy	Infrastructure and Transportation Focus Group
<b>City of Grand Rapids Planning Dept</b>	Other Government - Local	Market Analysis Non-Housing Community Development	Infrastructure and Transportation Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
		Strategy	
<b>City of Wyoming Engineering</b>	Other Government - Local	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Infrastructure and Transportation Focus Group
<b>City of Wyoming Planning Dept.</b>	Other Government - Local	Non-Housing Community Development Strategy	Infrastructure and Transportation Focus Group
<b>Grand Rapids Area Coalition To End Homelessness</b>	Continuum of Care	Housing Needs Assessment Public Housing Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Non-Housing Community Development Strategy Anti-poverty Strategy	Homeless Focus Group
<b>Community Rebuilders</b>	Services - Homeless	Housing Needs Assessment Public Housing Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children	Homeless Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
		Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy	
<b>Corporation for Supportive Housing</b>	Services – Homeless	Housing Needs Assessment Public Housing Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy	Individual in-person Consultation
<b>Davenport University</b>	Services - Education	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
<b>Department of Health and Human Services -Child Protective Services</b>	Other Government - State Child Welfare Agency Services - Children	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children	Homeless Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
		Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Market Analysis	
<b>Disability Advocates of Kent County</b>	Services - Persons with Disabilities	Non-Homeless Special Needs Non-Housing Community Development Strategy	Infrastructure and Transportation Focus Group
<b>Dwelling Place of Grand Rapids Nonprofit Housing Corporation</b>	Services – Homeless Housing	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Market Analysis	Homeless Focus Group, Affordable Housing Focus Group
<b>Dyer-Ives Foundation</b>	Foundation	Housing Needs Assessment Homelessness Strategy Market Analysis	Consultation regarding impact of housing market on homelessness (through the Vision to End Homelessness assessment consultation process).
<b>Essential Needs Task Force, Economic and Workforce Development Subcommittee</b>	Regional Organization	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Fair Housing Center of West Michigan</b>	Services – Fair Housing	Housing Needs Assessment	Affordable Housing Focus Group
<b>Family Promise of Grand Rapids</b>	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 Focus Group
<b>Fifth Third Bank</b>	Other - Bank	Housing Needs Assessment Market Analysis	Human Services Focus Group
<b>Frey Foundation</b>	Other - Foundation	Housing Needs Assessment Homelessness Strategy Market Analysis	Consultation regarding impact of housing market on homelessness (through the Vision to End Homelessness assessment consultation process).
<b>Genesis Non-Profit Housing Corporation</b>	Services - Homeless Housing	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Market Analysis	Homeless Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Grand Rapids Community College</b>	Services - Education	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
<b>Grand Rapids Community Foundation</b>	Other - Foundation	Housing Needs Assessment Homelessness Strategy Market Analysis	Homeless Focus Group, Consultation regarding impact of housing market on homelessness (through the Vision to End Homelessness assessment consultation process).
<b>Grand Rapids Housing Commission</b>	PHA	Housing Needs Assessment Public Housing Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Market Analysis	Public Housing Focus Group
<b>Grand Rapids Urban League</b>	Services - Homeless	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless Focus Group
<b>Grand Valley Metro</b>	Regional Organization	Market Analysis	Infrastructure and Transportation Focus

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Council</b>	Planning Organization	Non-Housing Community Development Strategy	Group
<b>Grand Valley State University</b>	Services - Education	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
<b>Grand Valley State University, Community Research Institute</b>	Services – Education	Housing Needs Assessment Homelessness Strategy Market Analysis	Individual communication for Foreclosure Data Consultation
<b>Habitat for Humanity of Kent County</b>	Services – Housing Housing	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Market Analysis	Affordable Housing Focus Group
<b>Healthy Homes Coalition of West Michigan</b>	Services – Health Services - Housing Other - Lead Safety	Lead-based Paint Strategy	Individual phone consultation
<b>Hispanic Center of Western Michigan</b>	Other – Cultural nonprofit	Non-Housing Community Development Strategy	Human Services Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Home Repair Services of Kent County, Inc.</b>	Services - Housing	Housing Needs Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis	Affordable Housing Focus Group
<b>Hope Network</b>	Services - Persons with Disabilities	Non-Homeless Special Needs	Infrastructure and Transportation Focus Group
<b>Inner City Christian Federation</b>	Services - Housing Services – Homeless Housing	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Market Analysis	Affordable Housing Focus Group
<b>Kent County Health Department - Environmental Health</b>	Other Government - Local Health Agency	Non-Homeless Special Needs Non-Housing Community Development Strategy	Human Services Focus Group
<b>Kent County Health Department – Community Wellness</b>	Other Government - Local Other – Lead Safety Health Agency	Lead-based Paint Strategy	Individual phone consultation
<b>Kent County Housing Commission</b>	PHA	Housing Needs Assessment Public Housing Needs Homeless Needs – Chronically Homeless	Public Housing Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
		Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Market Analysis	
<b>LINC Community Revitalization</b>	Housing Services - Housing	Housing Needs Assessment Market Analysis	Affordable Housing Focus Group
<b>McKenna Associates</b>	Other – Consultants	Housing Needs Assessment Market Analysis	Wyoming and Regional Housing Needs Assessment and Market Analysis consultation
<b>Mercantile Bank</b>	Other - Bank	Non-Housing Community Development Strategy	Affordable Housing Focus Group, Human Services Focus Group
<b>Mexico Supermercado</b>	Other - Business	Non-Housing Community Development Strategy	Human Services Focus Group
<b>Michigan Dept. of Health and Human Services</b>	Other Government - State	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Market Analysis	Homeless Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Michigan State Housing Development Authority (MSHDA)</b>	Other Government – State	Housing Needs Assessment Homelessness Strategy Market Analysis	Consultation regarding MSHDA-assisted supportive housing
<b>Neighborhood Ventures</b>	Other - Neighborhood Business District	Market Analysis Non-Housing Community Development Strategy	Economic Development Focus Group
<b>New Development Corporation</b>	Services – Housing Housing	Housing Needs Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis	Affordable Housing Focus Group
<b>Radio La Mejor GR</b>	Other - Business	Non-Housing Community Development Strategy	Human Services Focus Group
<b>Rental Property Owners Association</b>	Housing Regional Organization	Housing Needs Assessment Market Analysis	Consultation regarding impact of housing market on homelessness (through the Vision to End Homelessness assessment consultation process).
<b>The Salvation Army Social Services</b>	Housing Services - Homeless, Children	Housing Needs Assessment Public Housing Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy	Homeless Focus Group Human Services Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
		Non-Homeless Special Needs Market Analysis Non-Housing Community Development Strategy Anti-poverty Strategy	
<b>Senior Meals on Wheels</b>	Services - Elderly Persons Services - Persons with Disabilities	Non-Homeless Special Needs	Human Services Focus Group
<b>USDA Rural Development</b>	Other Government - Federal	Housing Needs Assessment Homelessness Strategy Market Analysis	Affordable Housing Focus Group
<b>Steelcase Foundation</b>	Foundation	Housing Needs Assessment Homelessness Strategy Market Analysis	Consultation regarding impact of housing market on homelessness (through the Vision to End Homelessness assessment consultation process).
<b>Wyoming Housing Commission</b>	PHA	Housing Needs Assessment Public Housing Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Market Analysis	Public Housing Focus Group
<b>YWCA Domestic</b>	Services - Homeless Services - Victims of	Housing Needs Assessment	Homeless Focus Group, Individual phone

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Crisis Center</b>	Domestic Violence Services - Housing	Homeless Needs – Families and Children Homelessness Strategy Non-Homeless Special Needs	consultation

**Kent County Specific Focus Group**

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Algoma Township</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>Alpine Township</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>Cascade Township</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>Casnovia Village</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>City of Kentwood</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>City of Walker</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>Gaines Township</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>Grand Rapids Township</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>Nelson Township</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>Village of Sand Lake</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>Solon Township</b>	Other Government - Local	All Sections	Kent County Focus Group
<b>Village of Sparta</b>	Other Government - Local	All Sections	Kent County Focus Group

### Grand Rapids Neighborhood Association Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Baxter Neighborhood Association</b>	Other: Neighborhood Organization	Non-Housing Community Development Strategy	Grand Rapids Neighborhood Association Focus Group
<b>Eastown Community Association</b>	Other: Neighborhood Organization	Non-Housing Community Development Strategy	Grand Rapids Neighborhood Association Focus Group
<b>Inner City Christian Federation</b>	Other: Neighborhood Organization	Non-Housing Community Development Strategy	Grand Rapids Neighborhood Association Focus Group
<b>John Ball Area Neighbors dba SWAN</b>	Other: Neighborhood Organization	Non-Housing Community Development Strategy	Grand Rapids Neighborhood Association Focus Group
<b>Neighbors of Belknap Lookout</b>	Other: Neighborhood Organization	Non-Housing Community Development Strategy	Grand Rapids Neighborhood Association Focus Group
<b>Roosevelt Park Neighborhood Association</b>	Other: Neighborhood Organization	Non-Housing Community Development Strategy	Grand Rapids Neighborhood Association Focus Group
<b>Seeds of Promise</b>	Other: Neighborhood Organization	Non-Housing Community Development Strategy	Grand Rapids Neighborhood Association Focus Group

### Wyoming Specific Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Assessor's Office</b>	Other Government - Local	Non-housing Community Development Strategy Market Analysis	Wyoming Focus Group
<b>Cherry Health</b>	Health Agency	Non-Homeless Special Needs	Wyoming Focus Group
<b>City of Kentwood</b>	Other Government - Local	Housing Needs Assessment Market Analysis	Wyoming Focus Group
<b>City of Wyoming</b>	Other Government - Local	Housing Needs Assessment	Wyoming Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
		Market Analysis	
<b>Community Rebuilders</b>	Housing Services – Homeless	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Strategy Non-Homeless Special Needs Market Analysis	Wyoming Focus Group
<b>Compass Property Management</b>	Other – Business Housing	Housing Needs Assessment	Wyoming Focus Group
<b>Connections (Family Futures)</b>	Services – Children	Non-Homeless Special Needs	Wyoming Focus Group
<b>Fair Housing Center of West Michigan</b>	Services – Fair Housing	Housing Needs Assessment	Wyoming Focus Group
<b>Family Promise of Grand Rapids</b>	Services – Homeless	Non-Homeless Special Needs	Wyoming Focus Group
<b>Fifth Third Bank</b>	Other – Bank	Market Analysis	Wyoming Focus Group
<b>Genesis Nonprofit Housing Corporation</b>	Services – Homeless Housing	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Strategy Market Analysis	Wyoming Focus Group
<b>Godwin Heights Public Schools - Administration</b>	Services – Education	Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Godwin Heights Public Schools</b>	Services - Education	Non-Housing Community Development	Wyoming Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
		Strategy	
<b>Grand Rapids Area Coalition to End Homelessness</b>	Continuum of Care	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs	Wyoming Focus Group
<b>Grandville Public Schools</b>	Services – Education	Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Habitat for Humanity of Kent County</b>	Housing Services – Homeless	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs	Wyoming Focus Group
<b>Healthy Homes Coalition of West Michigan</b>	Housing - Services Health Agency	Housing Needs Assessment	Wyoming Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Hispanic Center of West Michigan</b>	Other – Cultural Organization	Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Home Repair Services of Kent County</b>	Housing	Housing Needs Assessment	Wyoming Focus Group
<b>KConnect</b>	Regional Organization	Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Kent School Service Network</b>	Services – Education	Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Godfrey-Lee Public High School</b>	Services – Education	Non-Housing Community Development Strategy	Wyoming Focus Group
<b>LINC Community Revitalization</b>	Housing	Housing Needs Assessment Market Analysis	Wyoming Focus Group
<b>Michigan Works!</b>	Services – Employment	Market Analysis	Wyoming Focus Group
<b>The Salvation Army Social Services</b>	Housing Services – Homeless	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy	Wyoming Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
<b>Tommy Branns Steakhouse and Sports Bar</b>	Other – Restaurant	Non-Housing Community Development Strategy Market Analysis	Wyoming Focus Group
<b>United Church Outreach Ministry</b>	Other – Church	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy	Wyoming Focus Group
<b>Wyoming District Court</b>	Other Government - Local	Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Wyoming-Kent County Chamber of Commerce</b>	Business Leaders Regional Organization	Market Analysis Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Wyoming Community Development Committee</b>	Other Government - Local	Housing Needs Assessment Public Housing Needs Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs	Wyoming Focus Group

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the plan was addressed by consultation?	How was Agency/Group/ Organization consulted?
		Market Analysis Non-Housing Community Development Strategy Anti-poverty Strategy	
<b>Wyoming Engineering Dept.</b>	Other Government - Local	Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Wyoming Housing Commission</b>	PHA	Housing Needs Assessment Public Housing Needs	Wyoming Focus Group
<b>Wyoming Inspections Dept.</b>	Other Government - Local	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Wyoming Planning Dept.</b>	Other Government - Local	Housing Needs Assessment Market Analysis Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Wyoming Police Dept.</b>	Other Government - Local	Non-Housing Community Development Strategy Homelessness Strategy	Wyoming Focus Group
<b>Wyoming Public Schools</b>	Services – Education	Non-Housing Community Development Strategy	Wyoming Focus Group
<b>Wyoming Public Works Dept.</b>	Other Government - Local	Non-Housing Community Development Strategy	Wyoming Focus Group

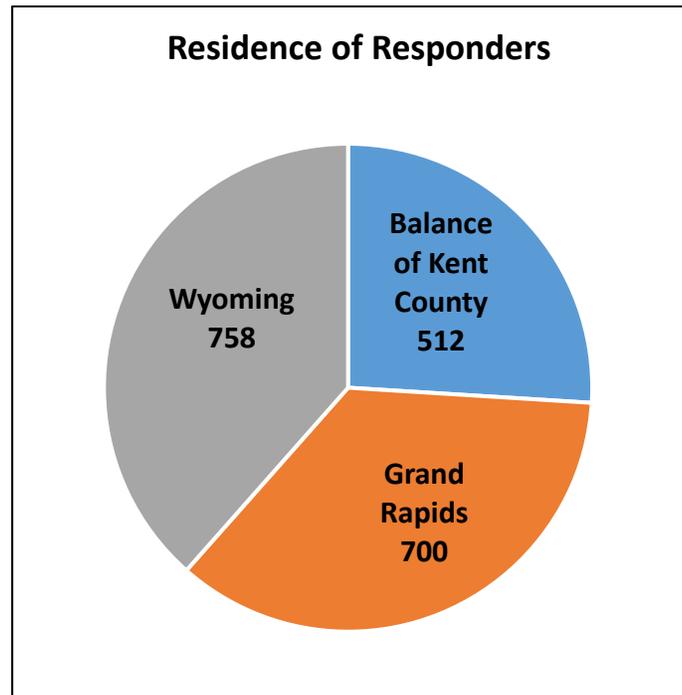
# Appendix B

Resident Survey Results

## Community Needs Survey - Summary of Results Kent County, City of Grand Rapids and City of Wyoming

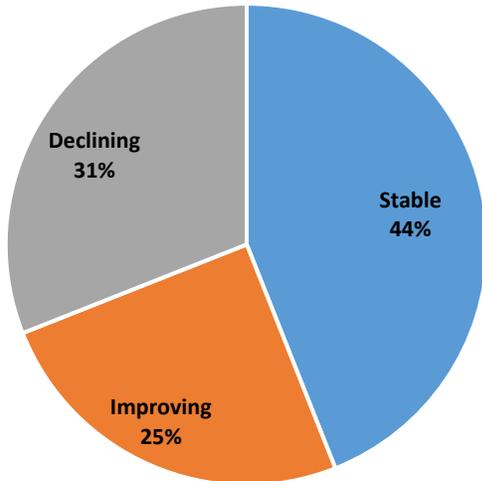
### Summary of Survey Responses

Residents of Kent County, Grand Rapids and Wyoming were invited to provide feedback on community conditions and needs to inform the development of the 2016-2020 Regional Consolidated Plan. The survey, which was distributed in electronic and hard copy format, in both English and Spanish, received 1,970 responses between August 3, 2015 and September 3, 2015. This document summarizes the responses.

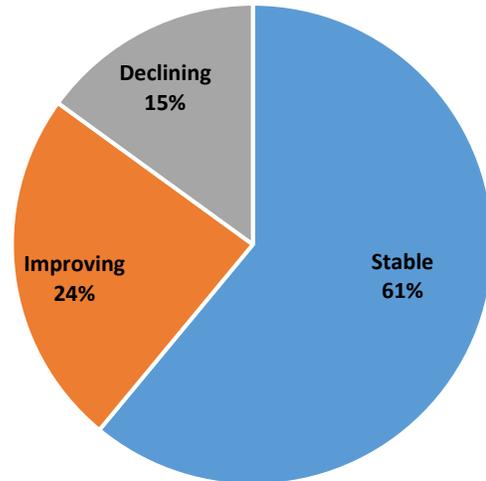


## Kent County Neighborhood Conditions

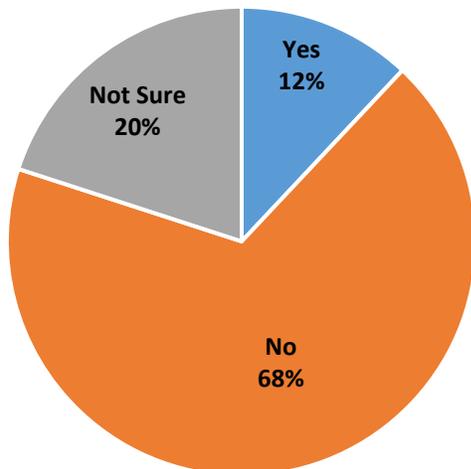
Do you believe the condition of the public streets, sidewalks, and facilities in your community is:



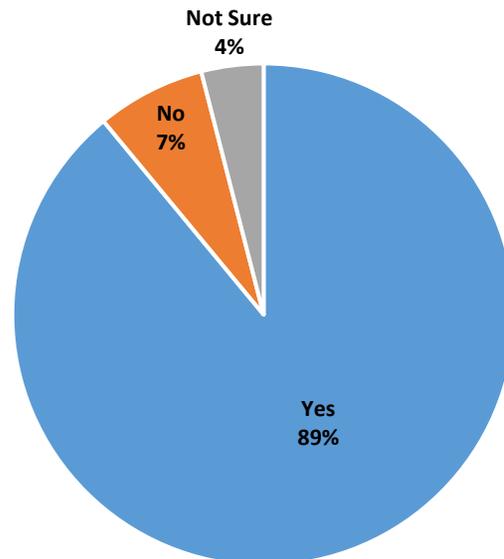
Do you believe the condition or maintenance of housing in your community is:



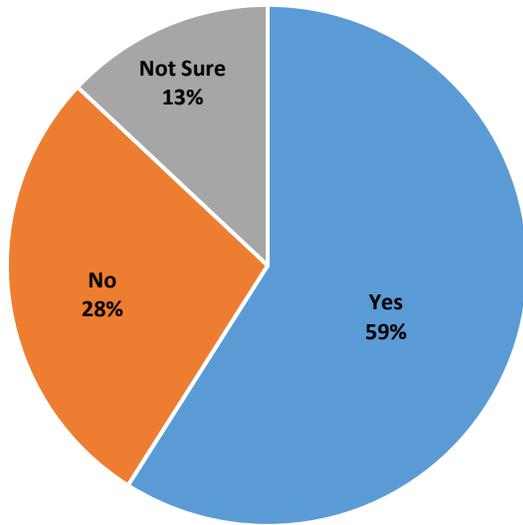
Do you believe abandoned or foreclosed properties are a significant issue in your community?



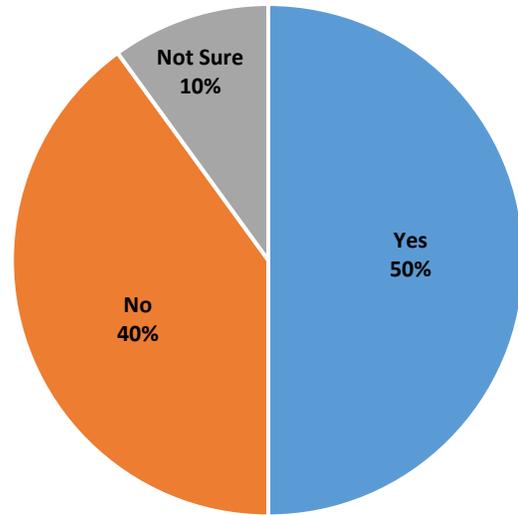
Do you feel safe in your immediate neighborhood?



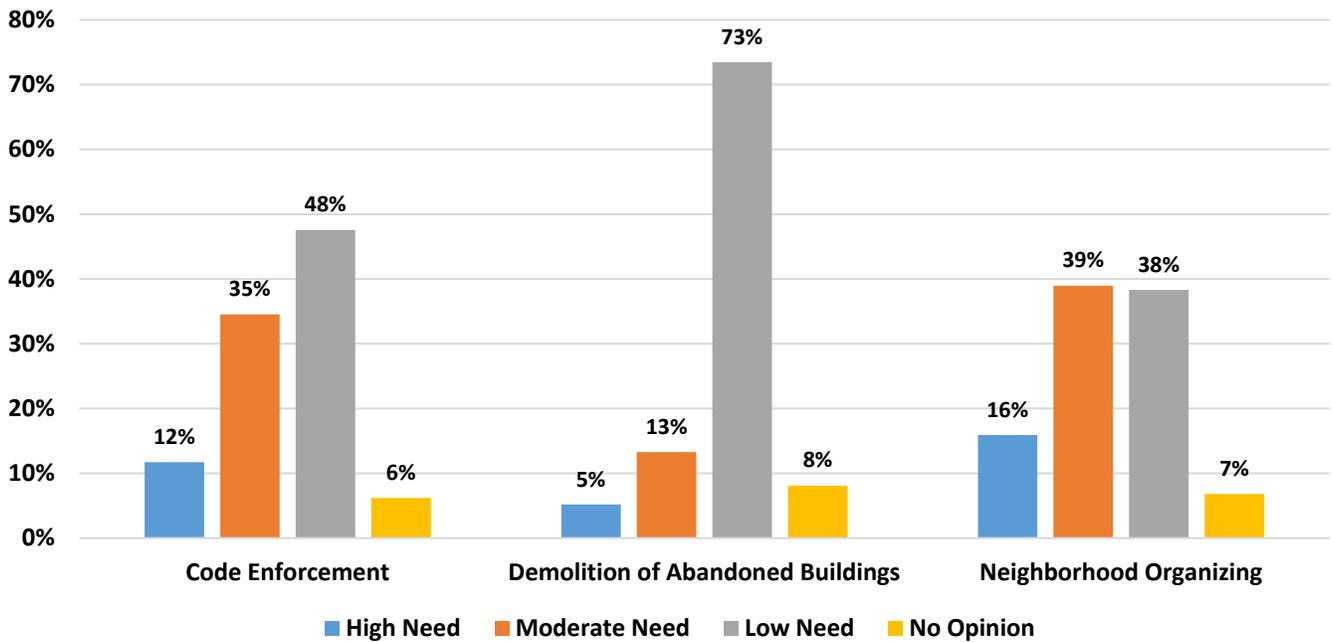
Do you believe housing costs are affordable where you live?



Is adequate transportation available for you to get to/from work, shopping and services?



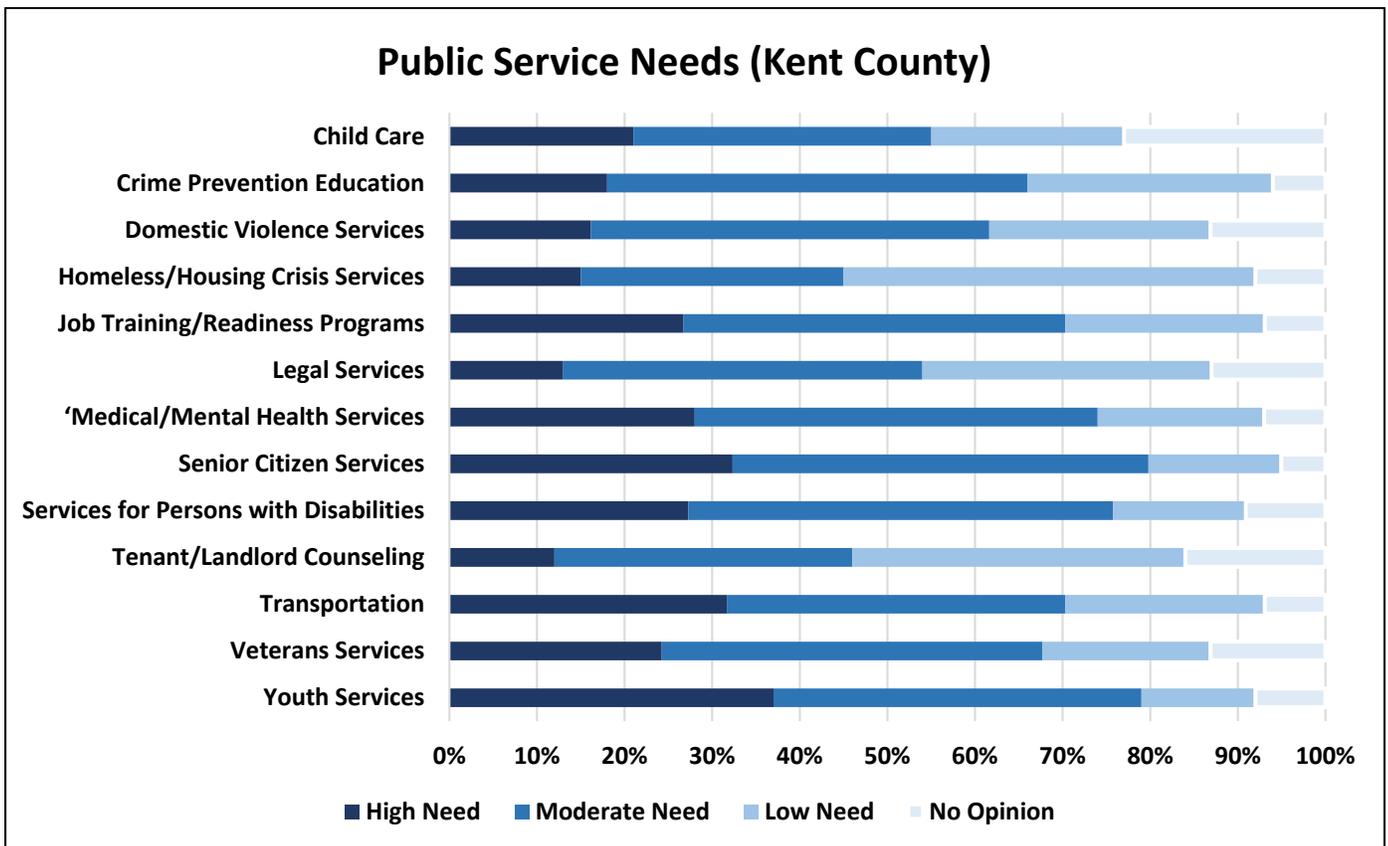
### Neighborhood Services (Kent County)



## Kent County Community Needs

Please rank the level of need for the following types of Public Services in your community (results in percent):				
Service	High Need	Moderate Need	Low Need	No Opinion
Child Care	21	34	22	23
Crime Prevention Education	18	48	28	6
Domestic Violence Services	17	45	25	13
Homeless/Housing Crisis Services	15	30	47	8
Job Training/Readiness Programs	27	43	23	7
Legal Services	13	41	33	13
'Medical/Mental Health Services	28	46	19	7
Senior Citizen Services	33	47	15	5
Services for Persons with Disabilities	28	48	15	9
Tenant/Landlord Counseling	12	34	38	16
Transportation	32	39	23	7
Veterans Services	24	43	19	13
Youth Services	37	42	13	8

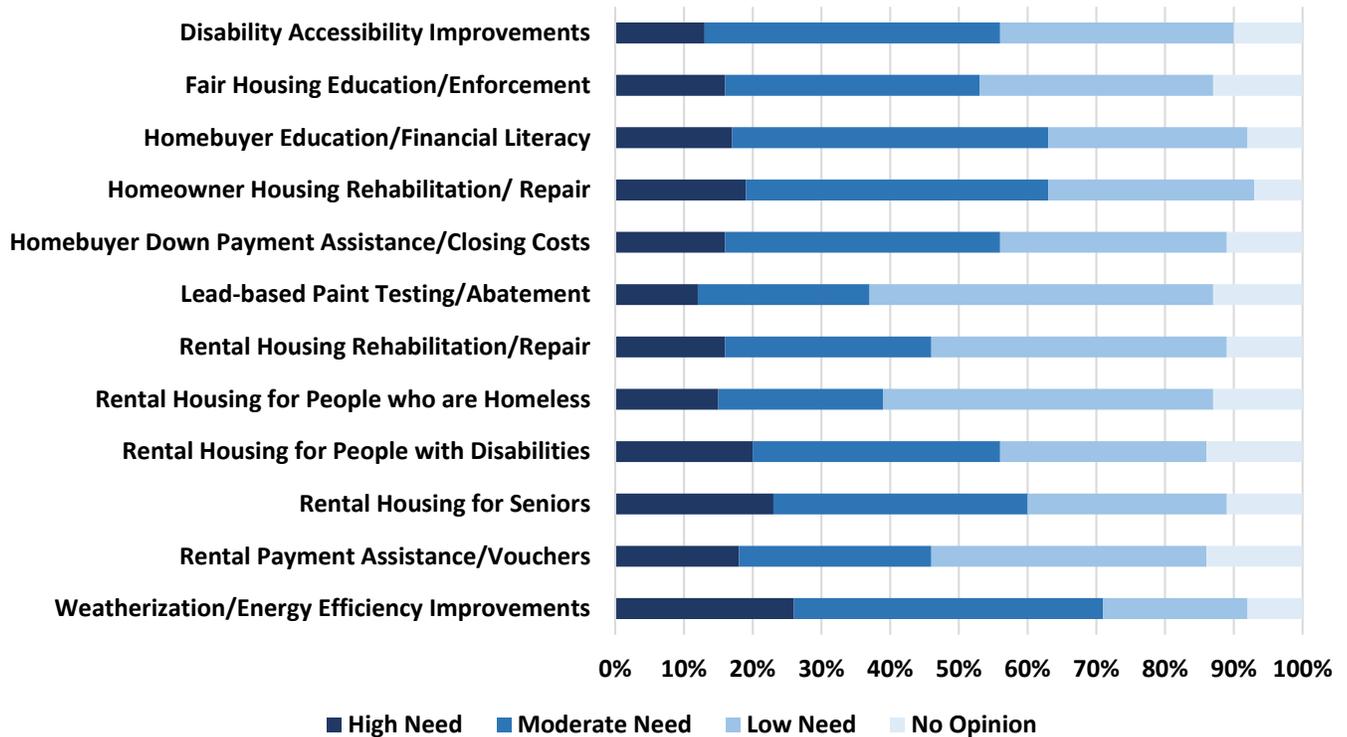
Please rank the level of need for the following types of neighborhood services in your community:



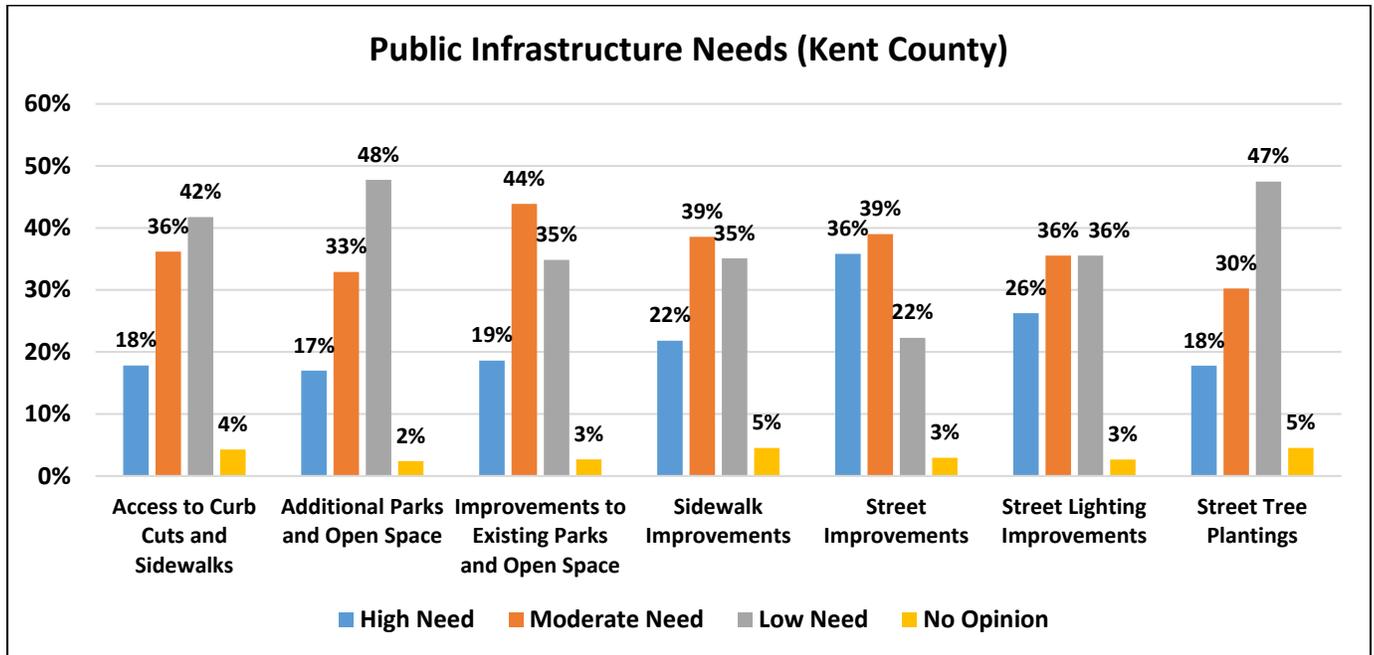
**Please rank the level of need for the following types of services needed in your community (results in percent):**

Service	High Need	Moderate Need	Low Need	No Opinion
Disability Accessibility Improvements	13	43	34	10
Fair Housing Education/Enforcement	16	37	34	13
Homebuyer Education/Financial Literacy	17	46	29	8
Homeowner Housing Rehabilitation/ Repair	19	44	30	7
Homebuyer Down Payment Assistance/Closing Costs	16	40	33	11
Lead-based Paint Testing/Abatement	12	25	50	13
Rental Housing Rehabilitation/Repair	16	30	43	11
Rental Housing for People who are Homeless	15	24	48	13
Rental Housing for People with Disabilities	20	36	30	14
Rental Housing for Seniors	23	37	29	11
Rental Payment Assistance/Vouchers	18	28	40	14
Weatherization/Energy Efficiency Improvements	26	45	21	8

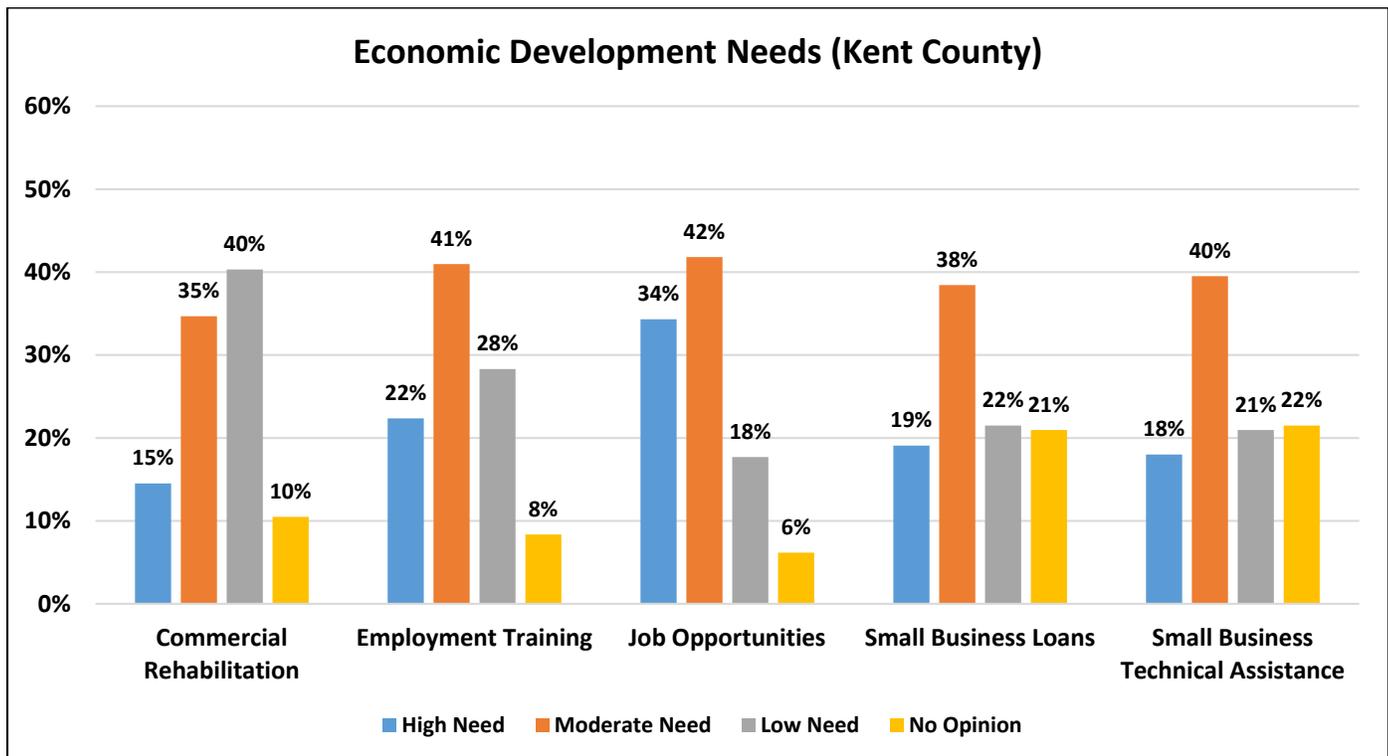
### Housing Needs (Kent County)



Please rank the level of need for the following types of Public Infrastructure in your community:

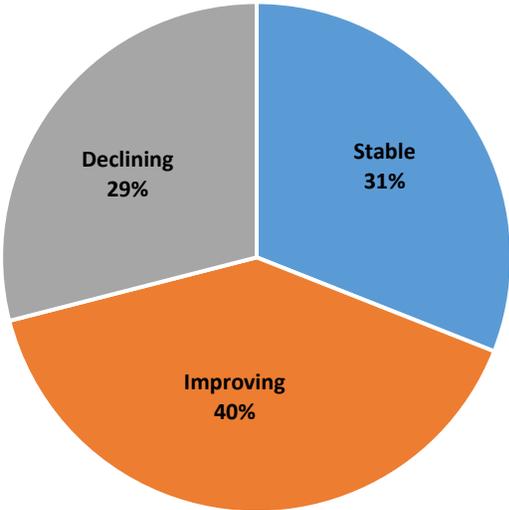


Please rank the level of need for the following types of Economic Development Services in your community:

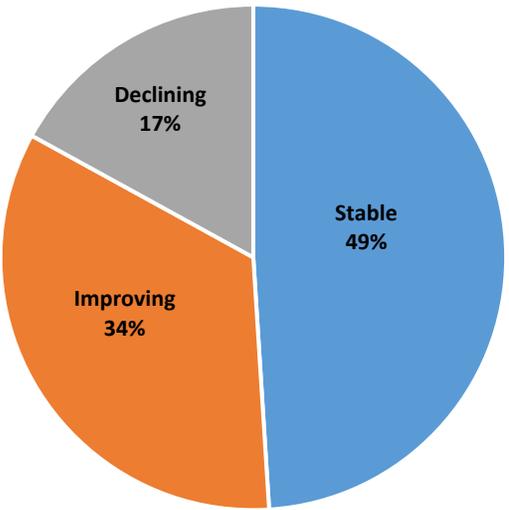


# Grand Rapids Neighborhood Conditions

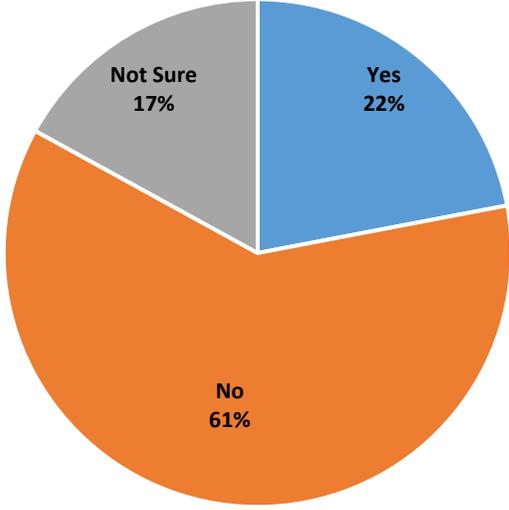
Do you believe the condition of the public streets, sidewalks, and facilities in your community is:



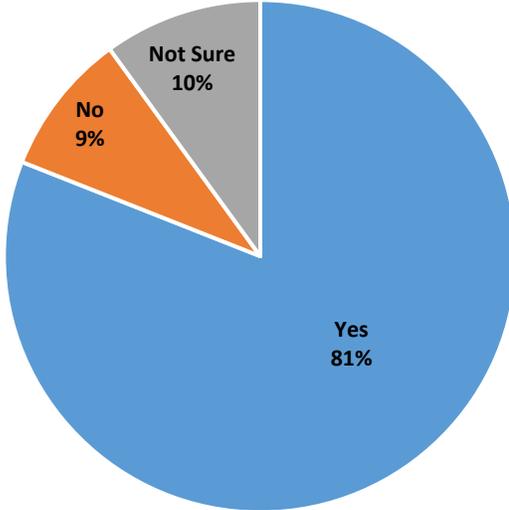
Do you believe the condition or maintenance of housing in your community is:



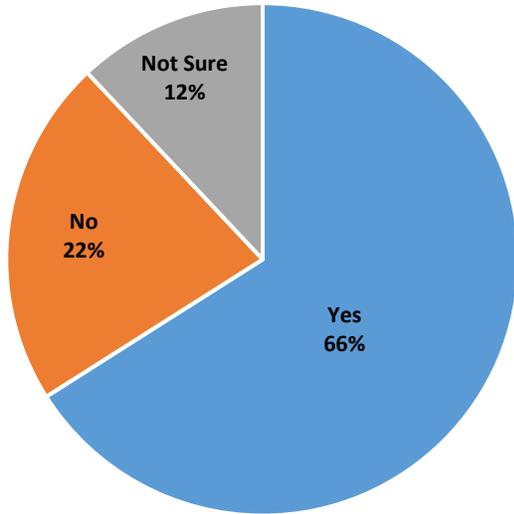
Do you believe abandoned or foreclosed properties are a significant issue in your community?



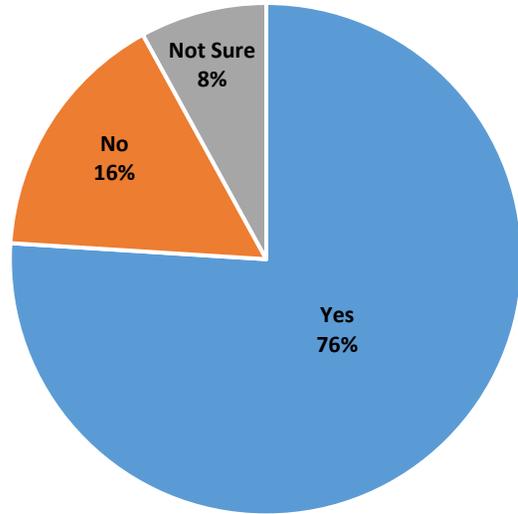
Do you feel safe in your immediate neighborhood?



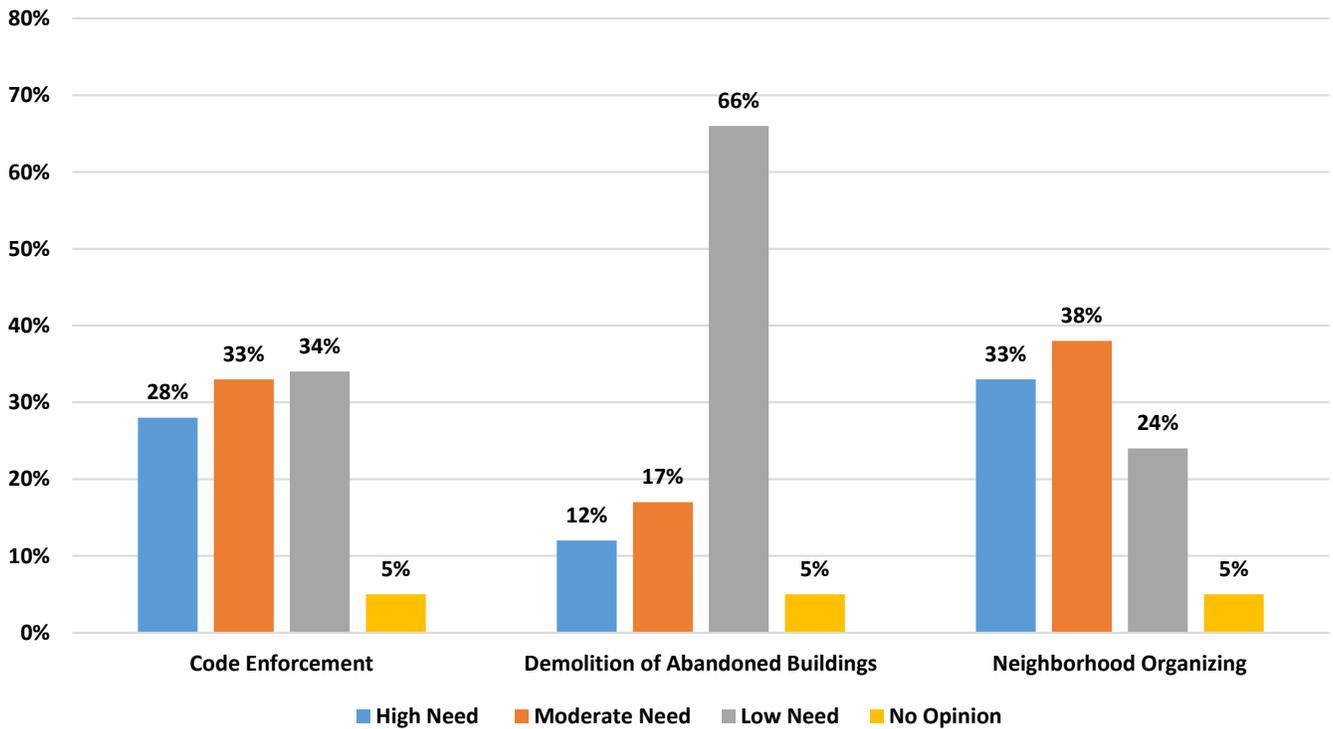
Do you believe housing costs are affordable where you live?



Is adequate transportation available for you to get to/from work, shopping and services?



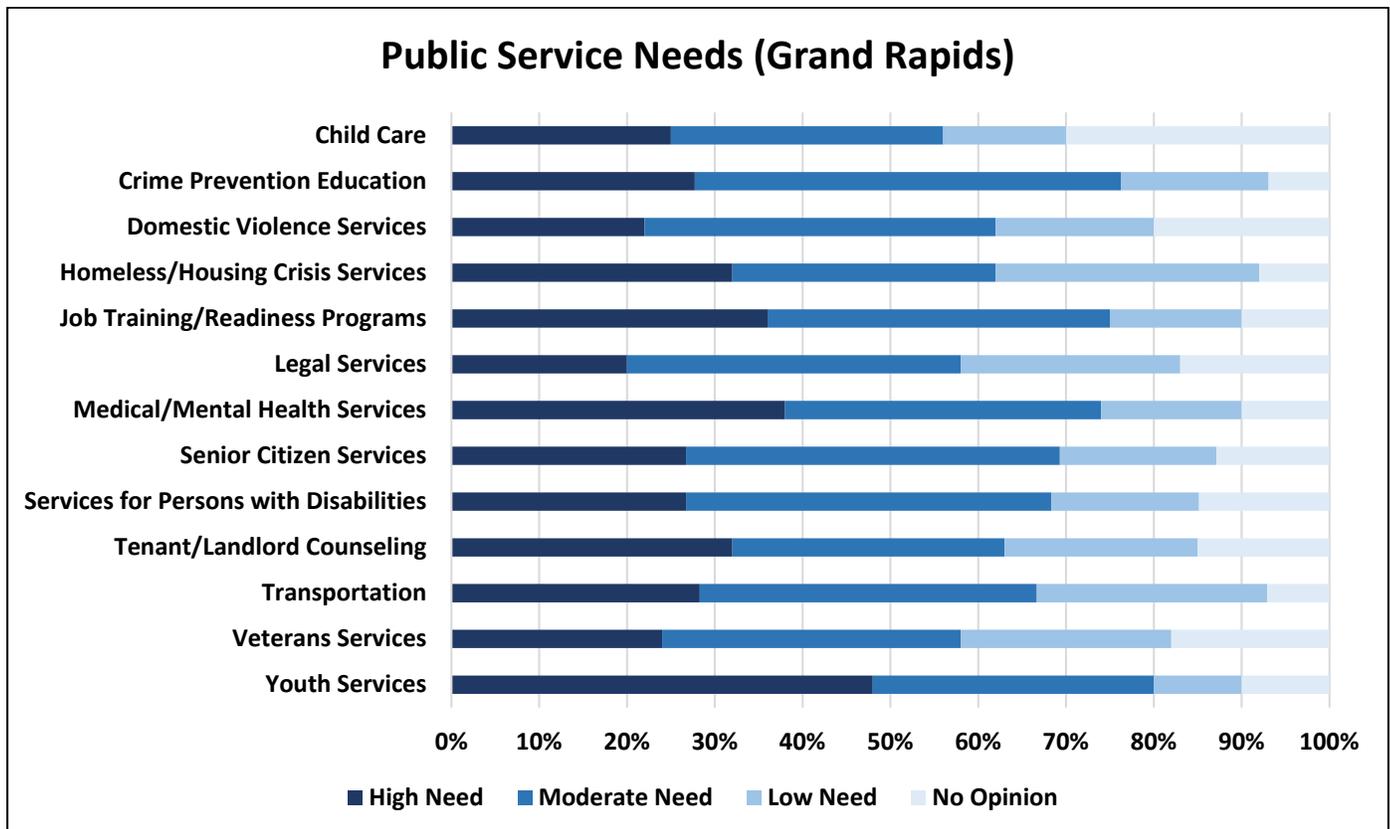
### Neighborhood Services (Grand Rapids)



## Grand Rapids Community Needs

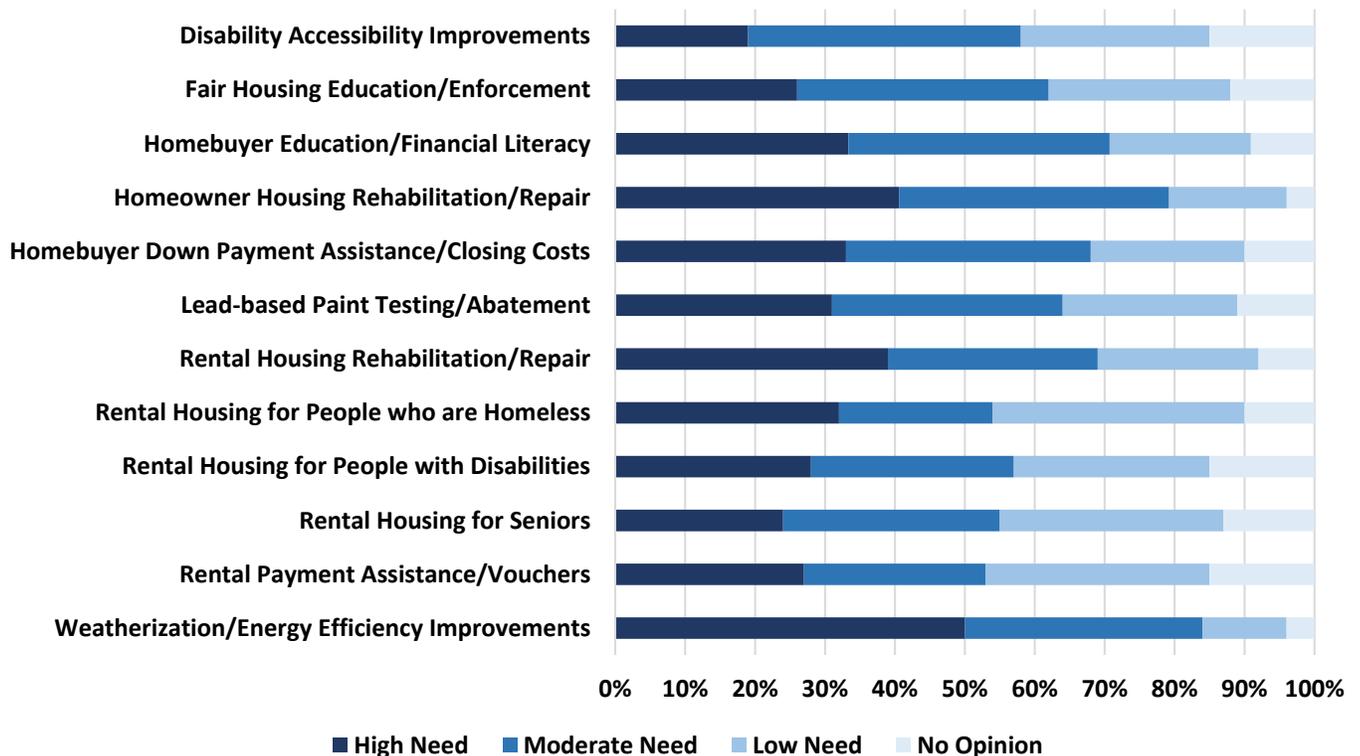
Please rank the level of need for the following types of Public Services in your community (results in percent):				
Service	High Need	Moderate Need	Low Need	No Opinion
Child Care	25	31	14	30
Crime Prevention Education	28	48	17	7
Domestic Violence Services	22	40	18	20
Homeless/Housing Crisis Services	32	30	30	8
Job Training/Readiness Programs	36	39	15	10
Legal Services	20	38	25	17
Medical/Mental Health Services	38	36	16	10
Senior Citizen Services	27	43	18	12
Services for Persons with Disabilities	27	42	17	15
Tenant/Landlord Counseling	32	31	22	15
Transportation	28	38	26	7
Veterans Services	24	34	24	18
Youth Services	48	32	10	10

Please rank the level of need for the following types of neighborhood services in your community:

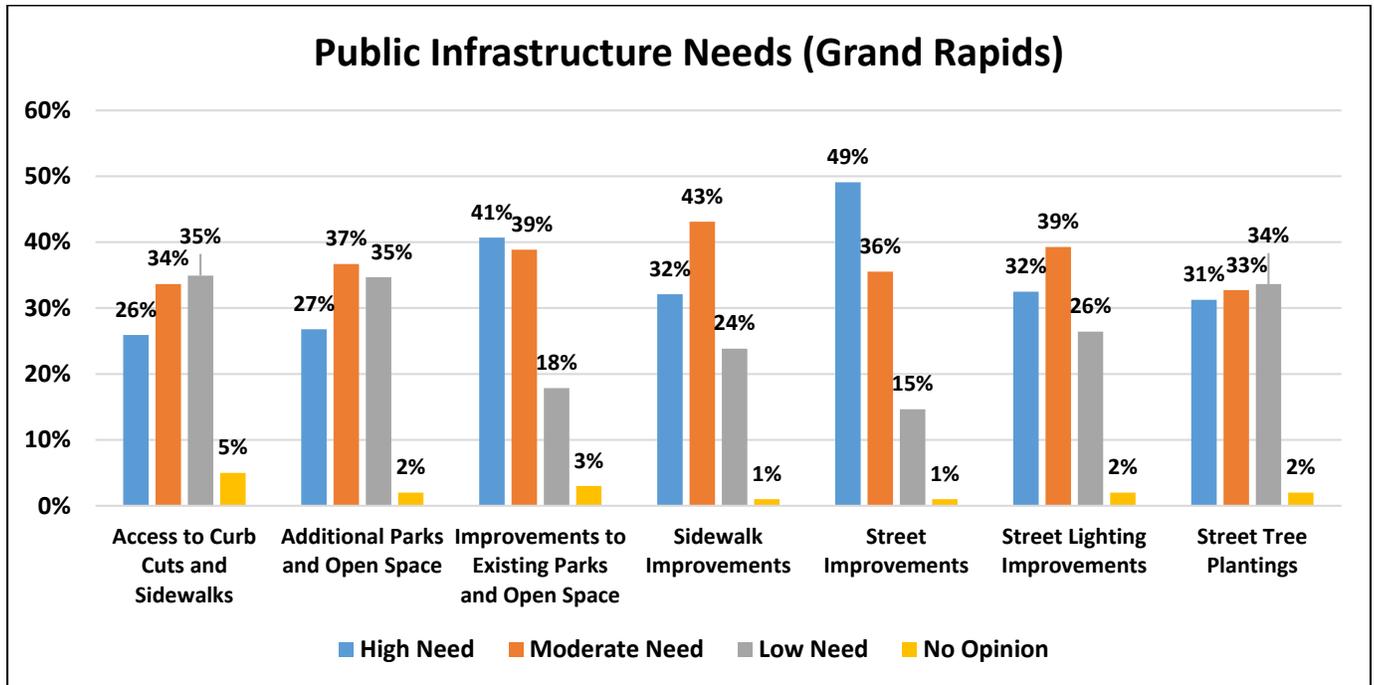


Please rank the level of need for the following types of services needed in your community (results in percent):				
Service	High Need	Moderate Need	Low Need	No Opinion
Disability Accessibility Improvements	19	39	27	15
Fair Housing Education/Enforcement	26	36	26	12
Homebuyer Education/Financial Literacy	33	37	20	9
Homeowner Housing Rehabilitation/Repair	41	39	17	4
Homebuyer Down Payment Assistance/Closing Costs	33	35	22	10
Lead-based Paint Testing/Abatement	31	33	25	11
Rental Housing Rehabilitation/Repair	39	30	23	8
Rental Housing for People who are Homeless	32	22	36	10
Rental Housing for People with Disabilities	28	29	28	15
Rental Housing for Seniors	24	31	32	13
Rental Payment Assistance/Vouchers	27	26	32	15
Weatherization/Energy Efficiency Improvements	50	34	12	4

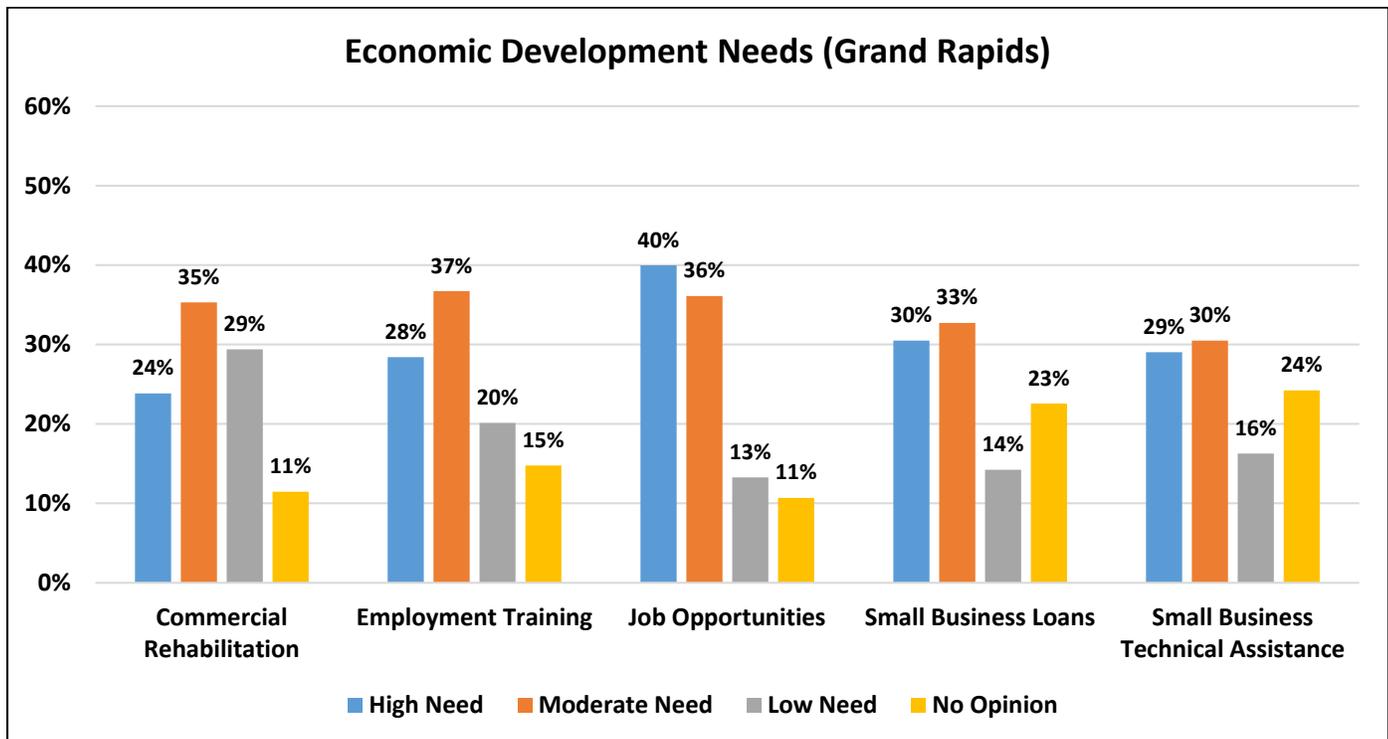
### Housing Needs (Grand Rapids)



Please rank the level of need for the following types of Public Infrastructure in your community:

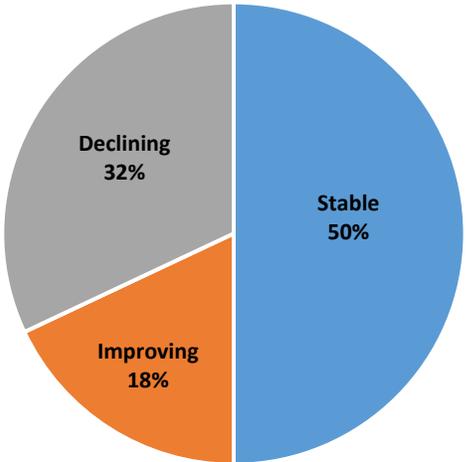


Please rank the level of need for the following types of Economic Development Services in your community:

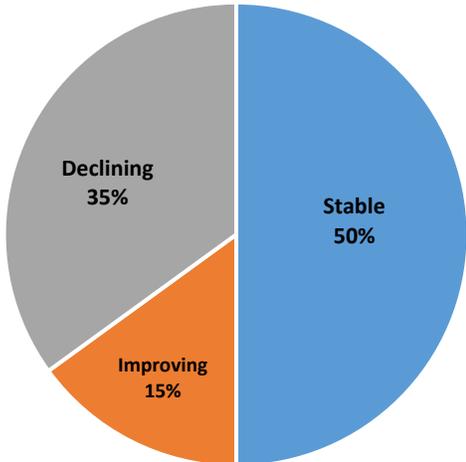


# Wyoming Neighborhood Conditions

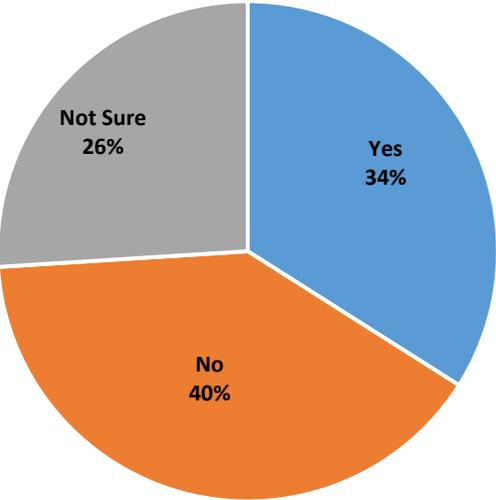
Do you believe the condition of the public streets, sidewalks, and facilities in your community is:



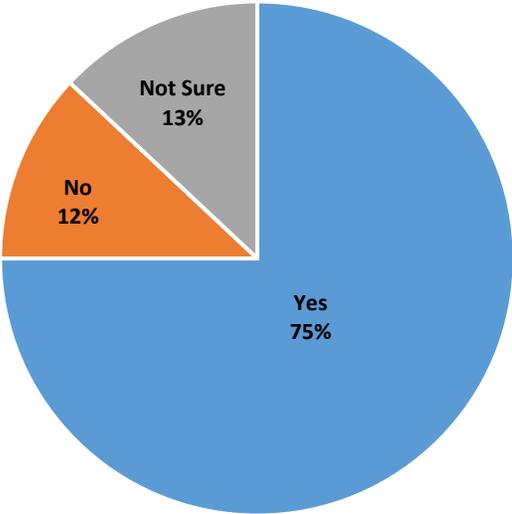
Do you believe the condition or maintenance of housing in your community is:



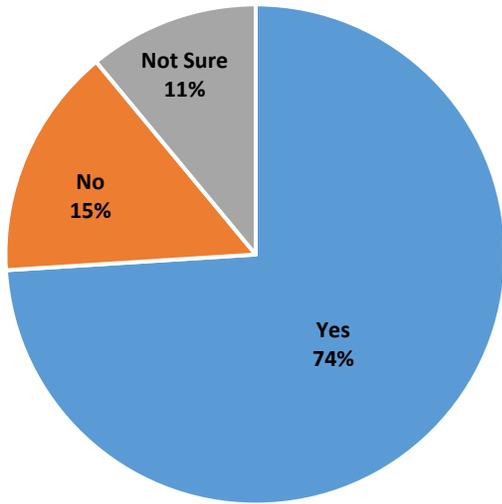
Do you believe abandoned or foreclosed properties are a significant issue in your community?



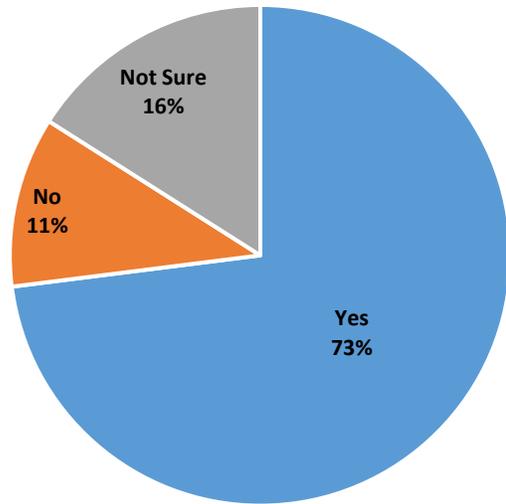
Do you feel safe in your immediate neighborhood?



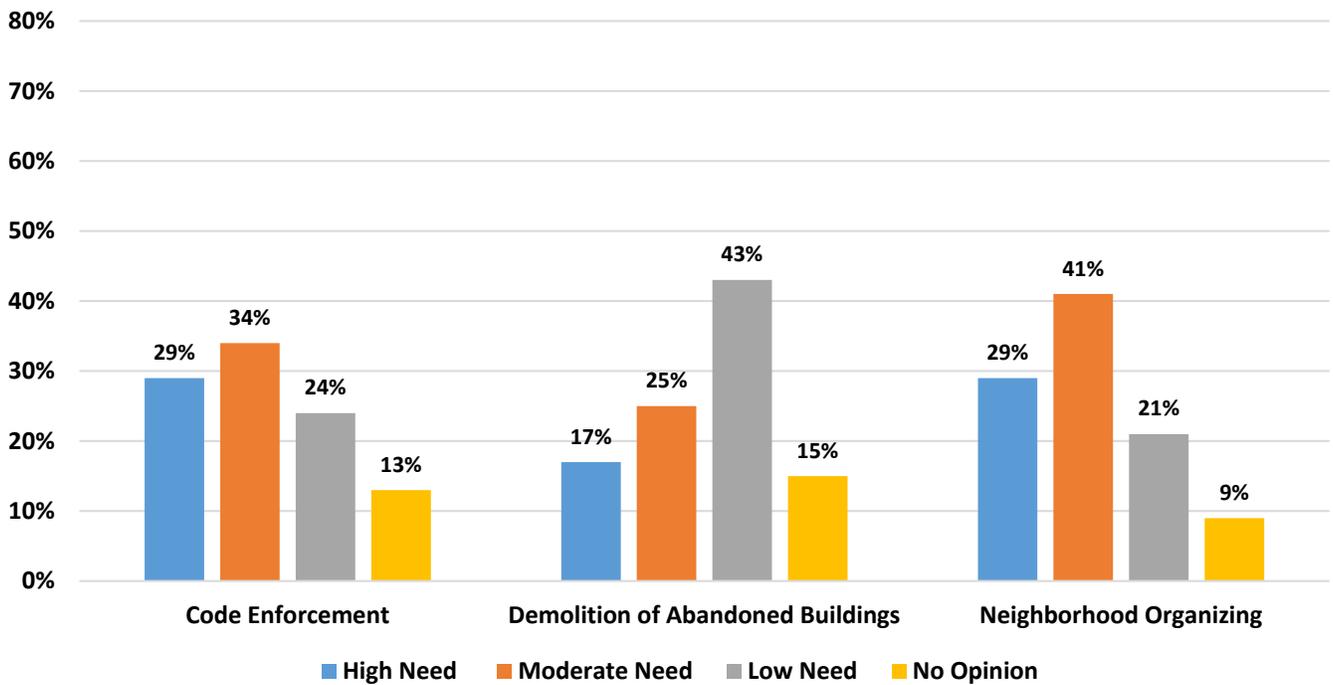
Do you believe housing costs are affordable where you live?



Is adequate transportation available for you to get to/from work, shopping and services?



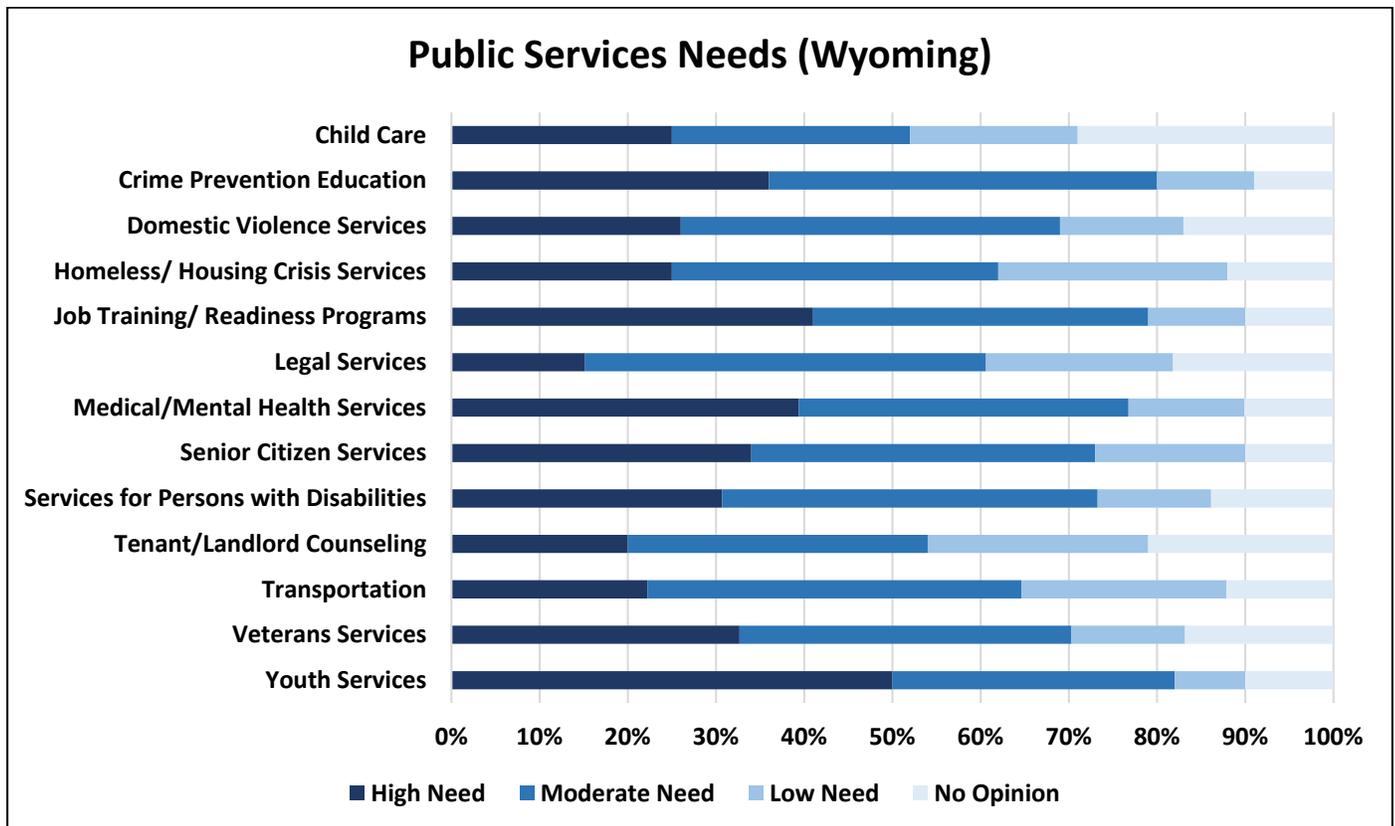
### Neighborhood Services (Wyoming)



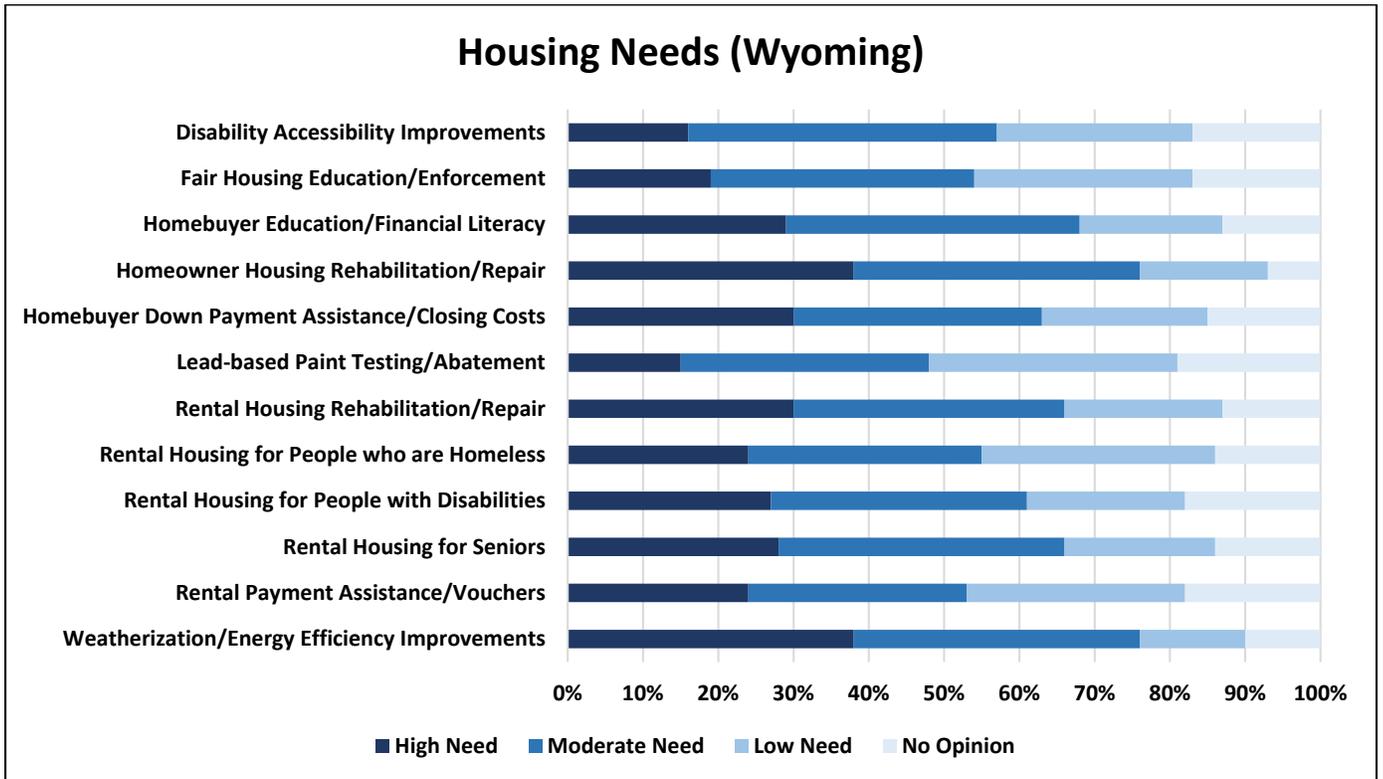
## Wyoming Community Needs

Please rank the level of need for the following types of Public Services in your community (results in percent):				
Service	High Need	Moderate Need	Low Need	No Opinion
Child Care	25	27	19	29
Crime Prevention Education	36	44	11	9
Domestic Violence Services	26	43	14	17
Homeless/ Housing Crisis Services	25	37	26	12
Job Training/ Readiness Programs	41	38	11	10
Legal Services	15	45	21	19
Medical/Mental Health Services	39	37	14	10
Senior Citizen Services	34	39	17	10
Services for Persons with Disabilities	31	43	13	13
Tenant/Landlord Counseling	20	34	25	21
Transportation	22	42	23	12
Veterans Services	33	38	13	17
Youth Services	50	32	8	10

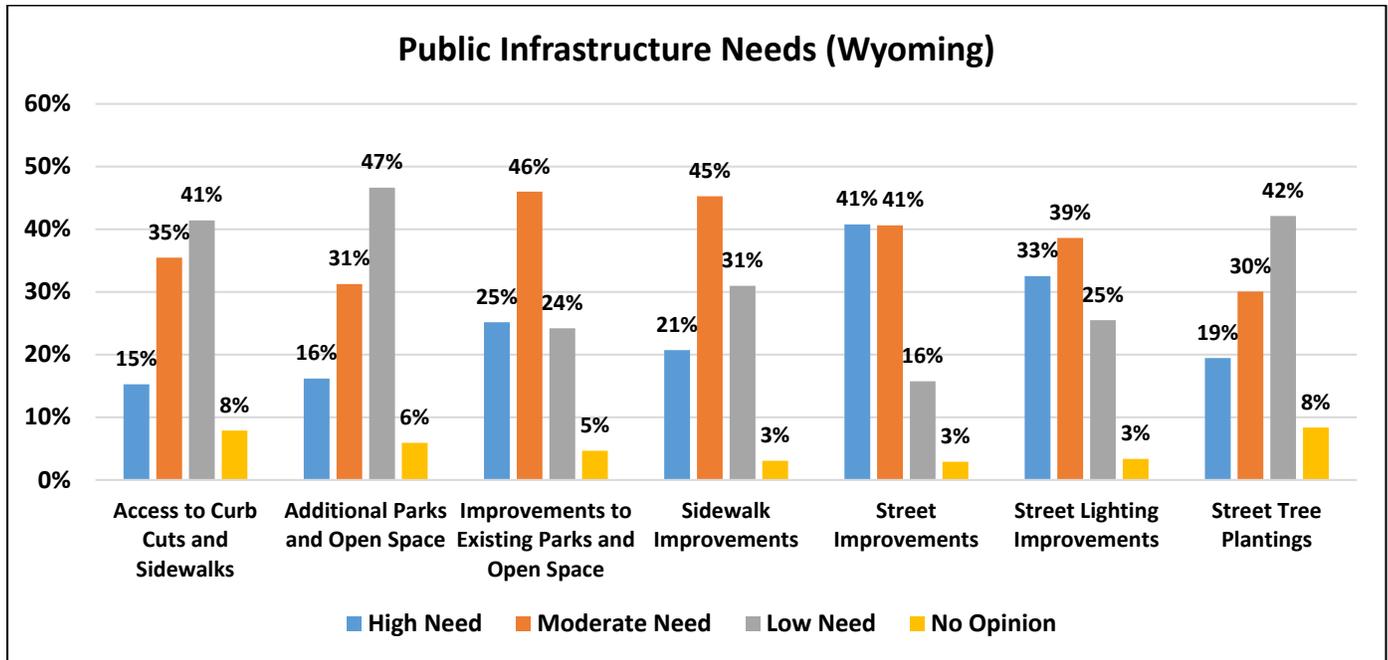
Please rank the level of need for the following types of neighborhood services in your community:



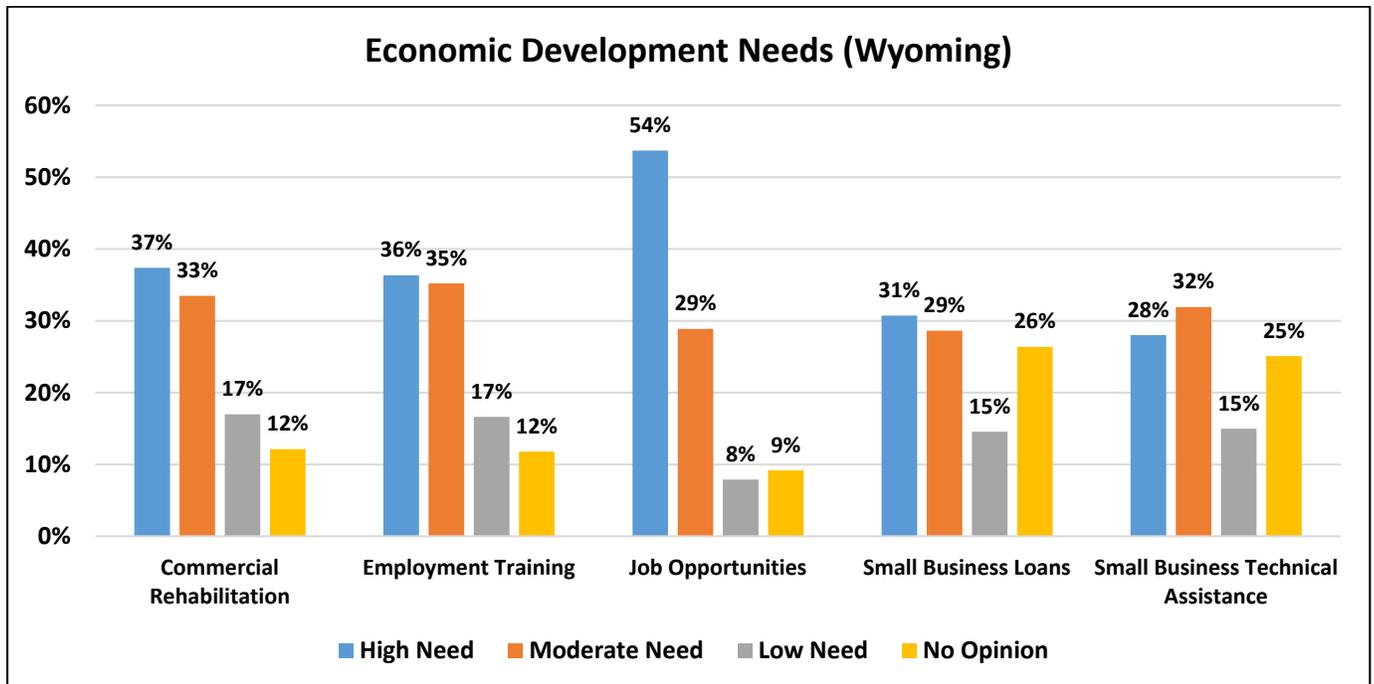
Please rank the level of need for the following types of services needed in your community (results in percent):				
Service	High Need	Moderate Need	Low Need	No Opinion
Disability Accessibility Improvements	16	41	26	17
Fair Housing Education/Enforcement	19	35	29	17
Homebuyer Education/Financial Literacy	29	39	19	13
Homeowner Housing Rehabilitation/Repair	38	38	17	7
Homebuyer Down Payment Assistance/Closing Costs	30	33	22	15
Lead-based Paint Testing/Abatement	15	33	33	19
Rental Housing Rehabilitation/Repair	30	36	21	13
Rental Housing for People who are Homeless	24	31	31	14
Rental Housing for People with Disabilities	27	34	21	18
Rental Housing for Seniors	28	38	20	14
Rental Payment Assistance/Vouchers	24	29	29	18
Weatherization/Energy Efficiency Improvements	38	38	14	10



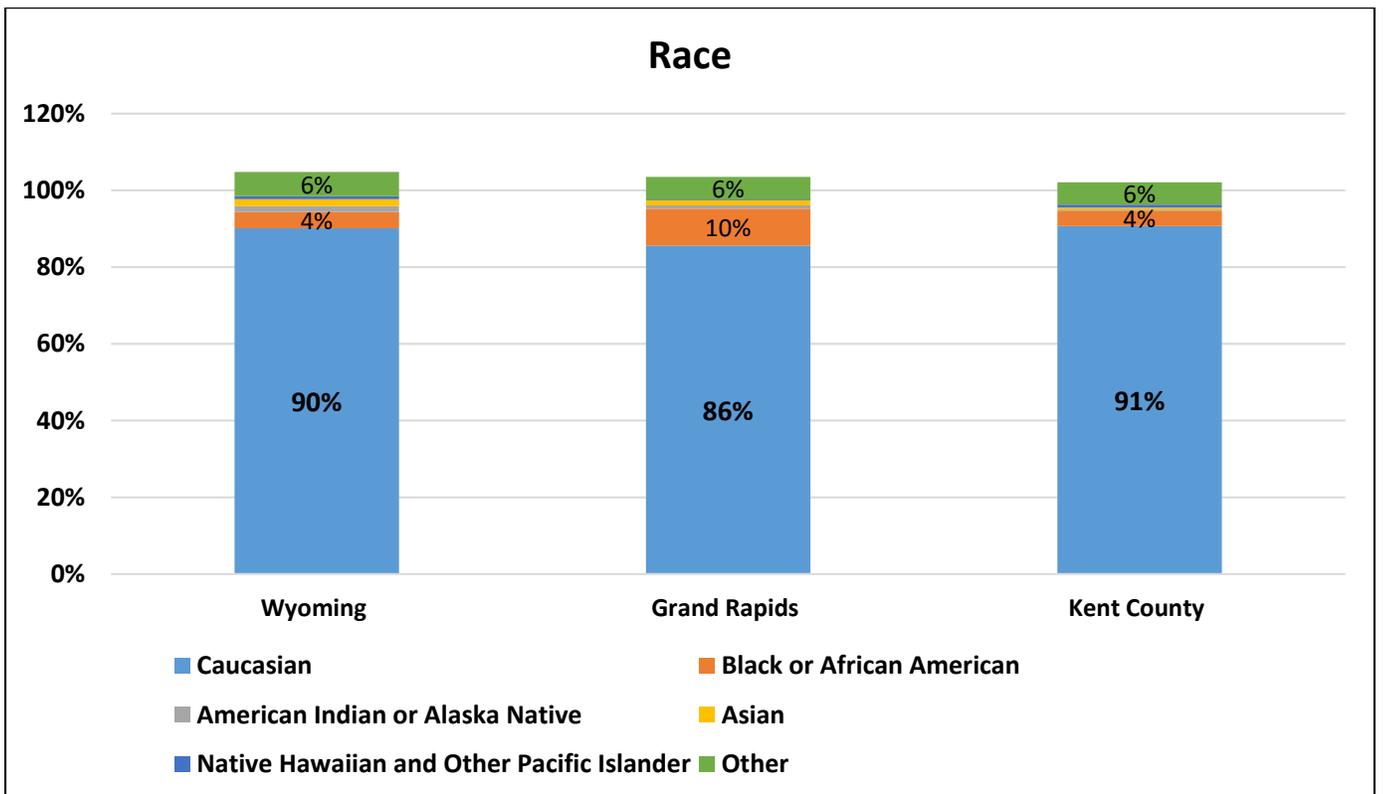
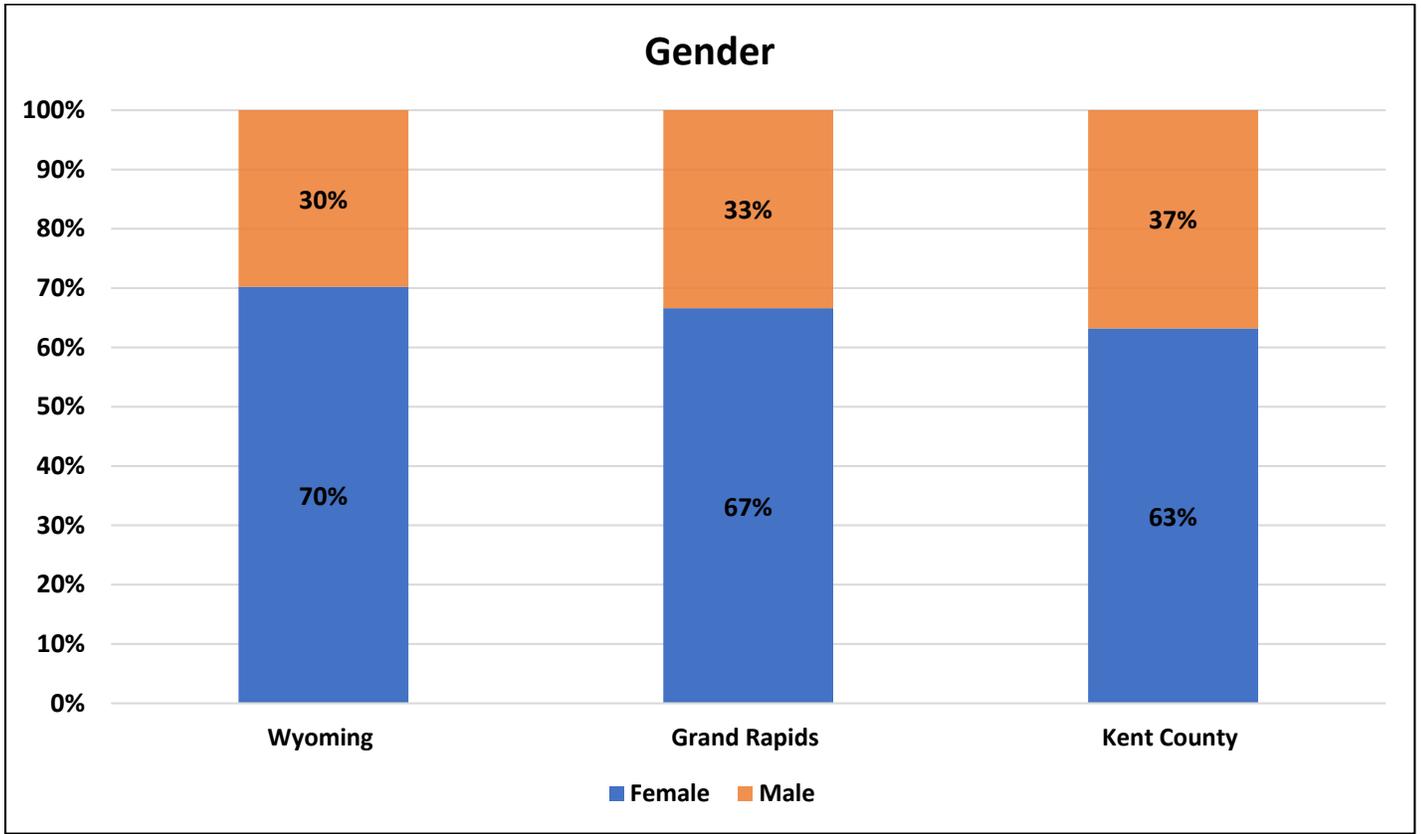
Please rank the level of need for the following types of Public Infrastructure in your community:



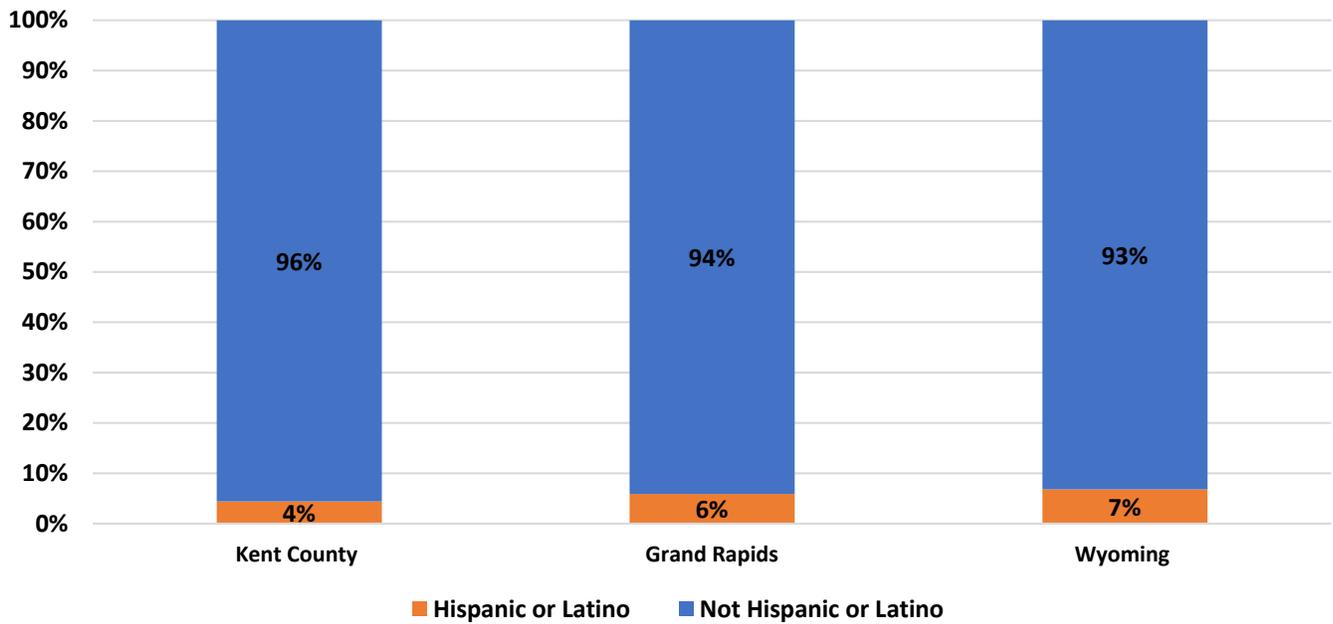
Please rank the level of need for the following types of Economic Development Services in your community:



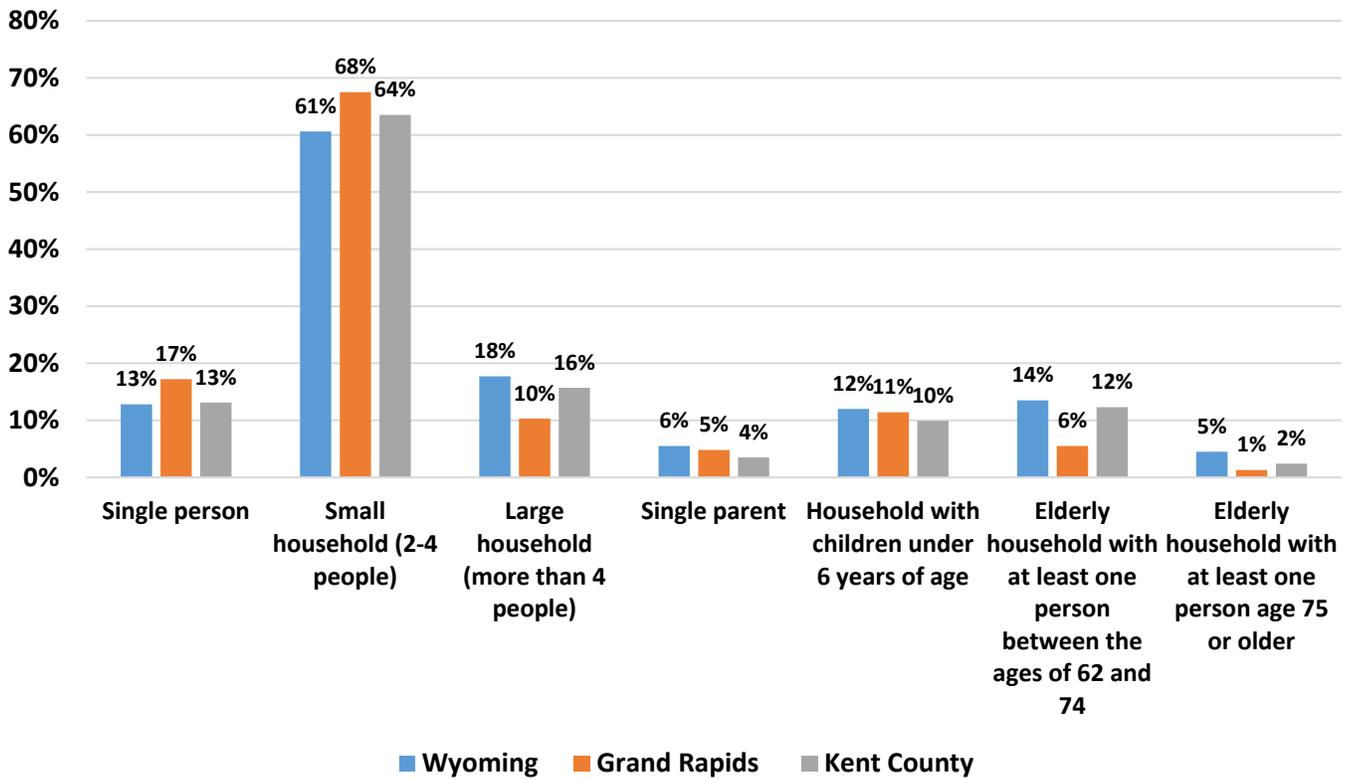
## Profile of Respondents: Demographics



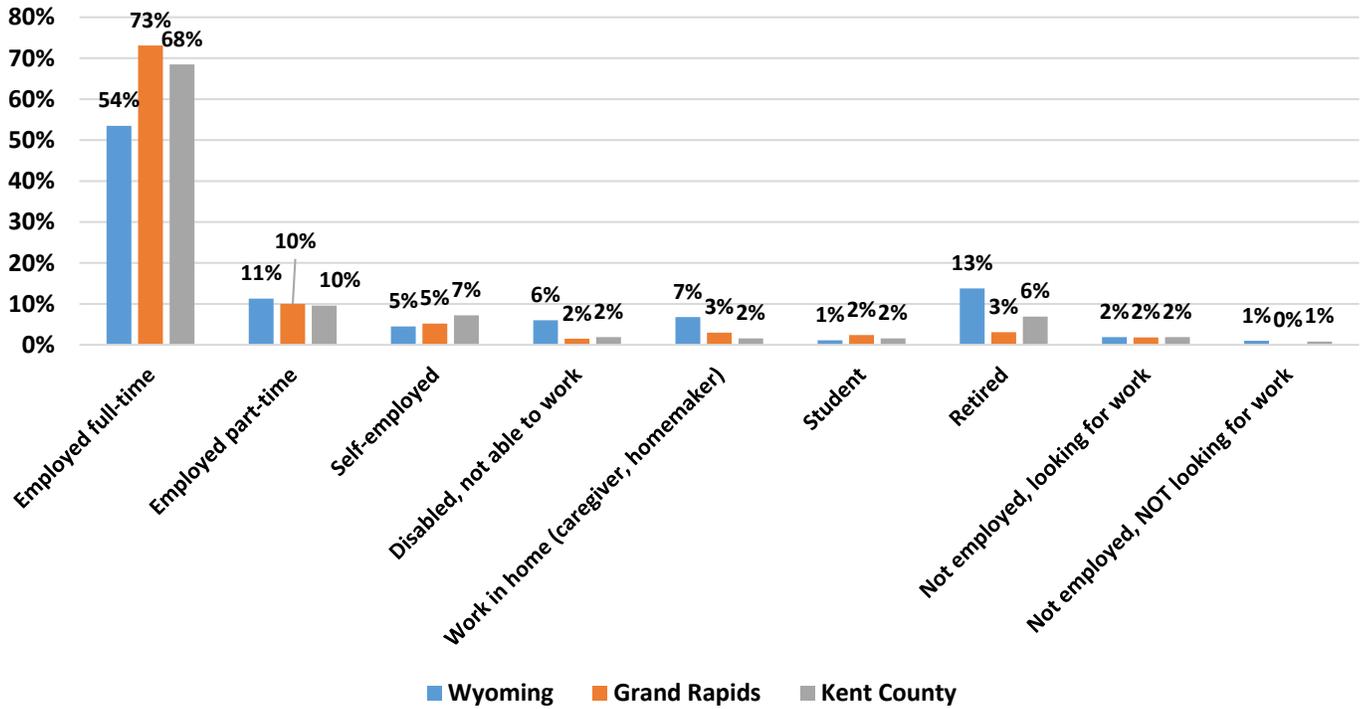
## Ethnicity



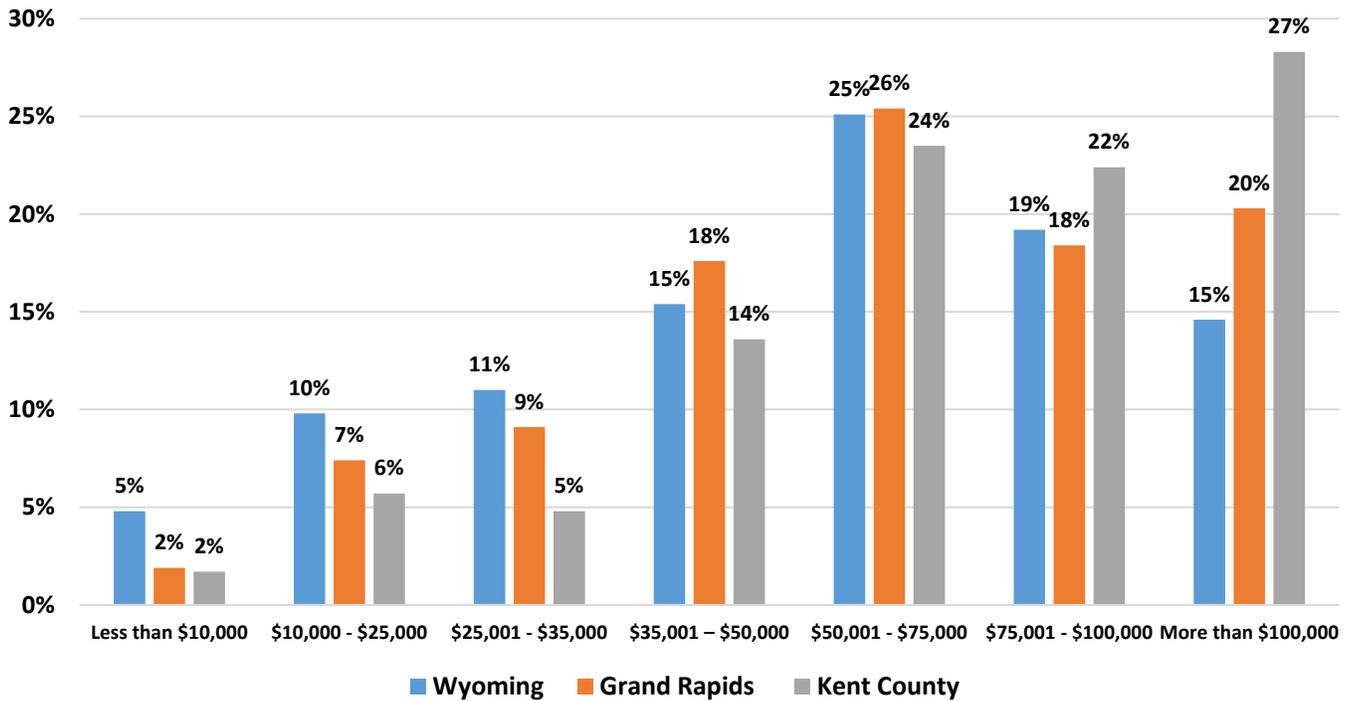
## Households



## Employment Status



## Total Household Income



# Appendix C

Assisted Housing Inventory

**Kent County Assisted Housing Inventory (2015)**

PROPERTY NAME	PROPERTY ADDRESS	CITY	TOTAL UNITS	AFFORDABLE UNITS	PSH UNITS	TARGET POPULATION	MARKET RENT UNITS	LIHTC OR OTHER AFFORDABILITY EXPIRATION (If applicable)	LIHTC EXTENDED USE AGREEMENT (If applicable)	EXPIRING BY 2021
River Grove Retirement Community	5761 Jupiter Avenue	Belmont	46	46		Elderly	0	2015	2015	46
Gregg Apartments	302 South Maple Street	Caledonia	32	32		Family	0			
Station Creek Retirement Community	10010 Crossroad Court	Caledonia	49	49		Elderly	0	2015	2015	49
Lexington Woods Apartments	123 South Street	Cedar Springs	16	16		Family	0			
Red Flannel Acres	311 Oak Court	Cedar Springs	48	48			0	2024	2054	
100-150 Wealthy at Tapestry Square	100 and 150 Wealthy Street SE	Grand Rapids	32	32			0			
101 South Division Lofts	101 South Division Avenue	Grand Rapids	20	20			0	2023	2053	
205 South Division Avenue Apartments	205 South Division Avenue	Grand Rapids	38	38	5		0			
240 Ionia Avenue Apartments	240 Ionia Avenue	Grand Rapids	48	40			8			
26 Cherry Street Apartments	26 Cherry Street SW	Grand Rapids	45	45	7		0			
345 State Street Apartments	345 State Street SE	Grand Rapids	34	34			0			
442 Eastern	442 Eastern Avenue SE	Grand Rapids	2	2			0			
528 Sheldon	528 Sheldon Avenue SE	Grand Rapids	4	4			0			
834 Lake Drive Apartments	834 Lake Drive Apartments	Grand Rapids	37	37			0			
Adams Park Apartments	1440 Fuller Avenue SE	Grand Rapids	188	188		Elderly And Disabled	0			
Allen Manor	532 James Street SE	Grand Rapids	24	24			0			
Alten Avenue Apartments	108, 116, 120, 126 Alten Avenue N	Grand Rapids	8	8		Special needs	0			
Ambrose Ridge	1501 Woodworth Street NE	Grand Rapids	84	84		Elderly	0	2011	2110	
American House	2771 Kalamazoo SE	Grand Rapids	133	40		Elderly	93	2009	2024	
Avenue Apartments, The	1300 Madison Avenue	Grand Rapids	10	10		Elderly	0	2020	2035	
Baileys Grove	5252 Bailey Center Drive SE	Grand Rapids	43	43			0	2015	2015	43
BCS Apartments	1168 Madison Avenue SE	Grand Rapids	2	2		Family	0	2020	2035	
Benson Group Home	840 Benson Avenue NE	Grand Rapids	16	16			0			
Birchgrove Apartments	4022 Kalamazoo Avenue SE	Grand Rapids	19	19		Chronically Mentally Ill	0			
Breton Village Green	2305 Burton SE	Grand Rapids	162	162		Elderly	0			
Bridge Street Place	Confidential	Grand Rapids	16	16	16		0	2024	2039	
Browning Claytor Townhomes	1221 Madison Avenue SE	Grand Rapids	12	12		Family	0	2019	2034	
Calumet Flats	303 South Division Avenue	Grand Rapids	16	16		Family	0			
Cambridge Square I	1836 Mason Street NE	Grand Rapids	124	57		Indv. Families - Not Eld/ Han	67			
Cambridge Square II	1836 Mason Street NE	Grand Rapids	124	62		Indv. Families - Not Eld/ Han	62			
Camelot Duplex	3959 & 3961 Camelot Drive SE	Grand Rapids	2	2		Family	0	2010	2109	
Camelot Woods I	2399 Charring Cross Drive SE	Grand Rapids	200	200		Elderly And Family	0			
Camelot Woods II	2399 Charring Cross Drive SE	Grand Rapids	100	100		Family	0			
Campau Commons Apartments	821 South Division Avenue	Grand Rapids	92	92			0	2021	2051	
Carmody Apartments	730/736 Madison Avenue SE	Grand Rapids	19	19		Family	0			
Carrier Crest Apartments	205 Carrier NE	Grand Rapids	12	12		Elderly	0	2007	2022	
Century Lofts - Phase One	40 Logan Street SW	Grand Rapids	43	43	5		0			
Century Lofts - Phase Two	40 Logan Street NW	Grand Rapids	44	44	5		0			
Chaffee Apartments (see Lenox)	138 South Divison Avenue	Grand Rapids	8	8		Family	0			
Creston Plaza Apartments	1080 Creston Plaza Drive NE	Grand Rapids	100	100		Elderly & Family	0			

**Kent County Assisted Housing Inventory (2015)**

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Delaware Heights	10 Delaware Street SW	Grand Rapids	36	36			0	2016	2016	36
Delaware Manor	10 Delaware Street SW	Grand Rapids	47	46		Elderly	1			
Division Park Avenue Apartments	209 & 217 South Division Avenue	Grand Rapids	30	30	3		0	2026	2056	
Eastbrook Apartments	2329 Timberbrook Drive SE	Grand Rapids	54	54		Family	0	2011	2031	
Elmdale Apartments	1361 Elmdale NE	Grand Rapids	19	18		Chronically Mentally Ill	1			
Emerald Creek	3416 Haleh Circle	Grand Rapids	64	29		Family	35	2017	2032	
Emerald Creek II	3416 Haleh Circle	Grand Rapids	30	15		Family	15	2019	2034	
Ferguson Apartments	72 Sheldon Avenue SE	Grand Rapids	101	101	101	Special Needs	0	2016	2031	
Fountains, The	3971 Whispering Way SE	Grand Rapids	168	53		Indv. Families - Not Eld/ Hand	115			
Gaylord House Apartments	2765 Orange Avenue SE	Grand Rapids	28	28		Wholly Elderly Housekeeping	0			
Globe, The	315 Commerce Street SW	Grand Rapids	110	88	11	Family	22	2017	2116	
Goodrich Apartments	333-339 South Division	Grand Rapids	14	14	3	Elderly And Family	0	2024	2039	
Grand Rapids Housing Commission (Duplex/Single Family Homes)	Scattered Sites	Grand Rapids	42	42		Family	0			
Grandview	1925 Bridge Street NW	Grand Rapids	193	193		Elderly	0			
Grandville Avenue Homes	Grandville Avenue SW and Rumsey Street SW	Grand Rapids	10	10		Family	0			
Herkimer Apartments	309 South Division	Grand Rapids	122	122	122	Family	0	2010	2025	
Heron Courtyard	1138 Heron Court NE	Grand Rapids	33	33	33	Special Needs	0	2018	2117	
Heron Manor Assisted Living Apartments	2106 Leonard Street NE	Grand Rapids	55	25		Elderly	30	2023	2038	
HEROS	N/A	Grand Rapids	21	21	21		0			
Hidden Creek	1513 Hidden Creek Circle	Grand Rapids	152	30		Family	0			
Home At Last I	N/A	Grand Rapids		0	16		0			
Home At Last II	N/A	Grand Rapids		0	16		0			
Home At Last III	N/A	Grand Rapids		0	21		0			
Hope Community	1024 Ionia SW	Grand Rapids	12	12		Rapid Re-housing	0	2006	2021	
Hope Community Phase II	1024 Ionia SW	Grand Rapids	12	12		Rapid Re-housing	0	2008	2023	
HOPWA	N/A	Grand Rapids	7	7	7		0			
Kelsey Apartments	235 South Division Avenue	Grand Rapids	12	12		Family	0	2020	2119	
Klingman Lofts I	400 Ionia Avenue SW	Grand Rapids	41	41			0			
Klingman Lofts II	400 Ionia Avenue SW	Grand Rapids	42	42			0			
Lenox Apartments	349 South Division Ave	Grand Rapids	14	14			0			
Leonard Pines Apartments	1319 Leonard NE	Grand Rapids	24	24		Wholly Physically Handicapp	0			
Leonard Terrace	1315 Leonard NE	Grand Rapids	125	125		Age 55 And Older	0			
LINC Community Revitalization, Inc.	1321 Ewing SE, 1648 Madison SE, 900 Hancock, 1201 Prospect SE, 958 Sigsbee SE. 921 East Fulton	Grand Rapids	19	19			0			
LOFT	N/A	Grand Rapids	18	18	18		0			
Loft Apartments, The	26 Sheldon Blvd. SE	Grand Rapids	55	55			0	2012	2042	
Marsh Ridge	470 Marsh Ridge Drive NW	Grand Rapids	100	100		Elderly	0	2009	2039	

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Marsh Ridge II	470 Marsh Ridge Drive NW	Grand Rapids	50	50		Elderly	0	2010	3010	
Marsh Ridge III	470 Marsh Ridge Drive NW	Grand Rapids	131	35		Elderly	96	2017	2037	
Martineau Apartments	106-120 South Division Avenue	Grand Rapids	23	23		Family	0			
Metropolitan Park Apartments	334 350 Ionia Avenue SW	Grand Rapids	24	24			0	2021	2036	
Mount Mercy Apartments	1425 Bridge Street NW	Grand Rapids	125	125		Elderly	0	2007	2022	
Mt. Mercy Housing Development II	1425 Bridge Street NW	Grand Rapids	55	55	0	Elderly	0	2019	2118	
New Hope Homes	Shelby SW & Putnam SW	Grand Rapids	12	12			0	2010	2040	
Northlake Village	3425 Northlake Drive NE	Grand Rapids	96	96		Elderly and Family	0			
Oak Ridge Retirement Community	3781 Giddings Avenue SE	Grand Rapids	45	45		Wholly Elderly Housekeeping	0	2016	2016	45
Orchard Place	1901 Dawson Avenue NE	Grand Rapids	138	138			0	2009	2039	
Oroiquis Apartments	400-404 Bridge Street	Grand Rapids	27	27	27		0	2015	2030	
Park Place Apartments	2932 Marshall Avenue SE	Grand Rapids	165	165		Family	0	2021	2036	
Pleasant Prospect Homes	Various	Grand Rapids	90	90		Family	0	2006	2026	
Plymouth Arms Apartments	1836 Mason Street NE	Grand Rapids	80	79		Elderly	1			
Prospect Place Townhomes	1335 Prospect Avenue SE	Grand Rapids	7	7			0			
Ransom Tower Apartments	50 Ransom Avenue NE	Grand Rapids	153	153		Wholly Elderly Housekeeping	0			
Reflections Senior Apartments	500 Hall Street SE	Grand Rapids	60	60		Elderly	0	2026	2041	
Ridgewood Village Apartments	2110 Woodwind Drive SE	Grand Rapids	240	240			0			
Roosevelt Park Lofts	1363 Grandville Avenue SW	Grand Rapids	21	21			0	2023	2043	
Scattered Site Rental Units	1102, 1131 Madison Avenue SE	Grand Rapids	22	22			0			
Scattered Site Rental Units	1325 Wealthy SE, 747 Paris SE, 832 Madison SE, 1214 Wealthy SE									
Scattered Site Rental Units	1139 Baxter Street, 839 Bemis Street SE, 1042 Logan Street SE, 1050 Logan Street SE, 1156 Madison Avenue SE, 1330 Prospect Avenue SE	Grand Rapids								
Serrano Lofts	17 Williams Street SW	Grand Rapids	15	15	2		0	2025	2055	
Sheldon Apartments	1010 Sheldon Avenue SE	Grand Rapids	45	45	0	Elderly	0	2020	2119	
Shelter Plus Care SRA	N/A	Grand Rapids	57	57	57		0			
Shelter Plus Care TRA	N/A	Grand Rapids	164	164	164		0			
Southtown Square I	537 Hall Street SE, 429 Umatilla Street SE, 454 Umatilla St SE, and 428 Woodlawn Street SE	Grand Rapids	9	9		Family	0			
Southtown Square II	434-438 454-462, 516-518, and 521-529 Gilbert Street SE, 413 and 433 Hall Street SE, and 443-453 Umatilla Street SE	Grand Rapids	24	24		Family	0			

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Stonebrook	1880 Stonebrook Drive	Grand Rapids	83	83		Family	0	2008	2023	
Stonebrook II	1880 Stonebrook Drive	Grand Rapids	68	20		Family	48	2010	2025	
Stonebrook III	1880 Stonebrook Drive	Grand Rapids	64	26		Family	38	2012	2027	
Stratford Townhouse Cooperative	810 Ball Avenue NE	Grand Rapids	130	130		Family	0			
Stuyvesant Apartments	140 Madison SE	Grand Rapids	87	86		Partially Elderly Handicapped	1			
Traditions of Grand Rapids	2230 East Castle Drive	Grand Rapids	200	200			0	2010	2030	
Uptown Village	950 Wealthy Street SE	Grand Rapids	24	24			0	2021	2036	
Verne Barry Place	60 South Division Avenue	Grand Rapids	116	116	116	Family	0	2021	2036	
Villa Maria	1305 Walker Avenue NW	Grand Rapids	180	180		Elderly/Disabled	0			
Village Drive Apartments	2000 Saginaw Drive SE	Grand Rapids	24	24		Wholly Developmentally Disabled	0	2015	2015	24
Walnut Grove Apartments	875 Sheffield Street SW	Grand Rapids	80	80		Family	0	2017	2116	
Westminster Meadows	1152 Plymouth NE	Grand Rapids	64	64		Elderly	0	2009	2029	
Weston Apartments	50 Weston SW	Grand Rapids	190	190			0	2021	2051	
Fairlane Meadows Cooperative	3471 Fairmeadow Drive SW	Grandville	48	19		Indv. Families - Not Eld/ Handicapped	29			
Genesis Woods	4041 44th Street SW	Grandville	33	33	33		0			
Grand Heritage Manor	4300 Parkview Drive SW	Grandville	42	41		Wholly Elderly Housekeeping	1			
Kent Ridge Apartments	65 Kent Ridge Drive	Kent City	32	32		Family	0			
Kent Ridge Junction	161 Kent Ridge Drive	Kent City	32	32		Family	0	2007	2022	
Breton Meadows	4740 Breton Road SE	Kentwood	101	101		Elderly	0			
Genesis East Apartments	2745 44th Street SE	Kentwood	23	23	23	Family	0	2014	2044	
Greentree Apartments	4320 Kalamazoo Street SE	Kentwood	153	153		Elderly	0	2024	2039	
Kentwood (Countryside) Apartments	4885 Green Oak Lane SE	Kentwood	146	141		Indv. Families - Not Eld/ Handicapped	5			
Metropolitan Apartments	4634 N Breton Court SE	Kentwood	18	18		Wholly Physically Handicapped	0			
Pheasant Ridge	3395 Pheasant Ridge SE	Kentwood	166	166		Family	0	2018	2033	
Tamarisk Apartments	4520 Bowen Blvd SE	Kentwood	100	100		Partially Elderly Handicapped	0			
Wellington Woods Senior	4550 N Brenton Court SE	Kentwood	91	83		Elderly	8	2009	2024	
Whitney Young Village	4848 Breton Road SE	Kentwood	72	72		Indv. Families - Not Eld/ Handicapped	0			
Birchwood Gardens Apartments	767 Hunt Street	Lowell	34	34		Family	0			
Riverwalk Apartments	1501 Deborah Drive	Lowell	48	48			0	2022	2052	
Pine Ridge Apartments	3376 Tamarack Court NE	Plainfield Twp	168	74		Indv. Families - Not Eld/ Handicapped	94			
Rolling Pines	4650 Ramswood NE	Plainfield Twp	152	152		Family	0			
Harvest Hill Apartments	100 Childsdale	Rockford	46	46		Family	0	2016	2115	
Hillview Townhouses	602 Hillview Place	Rockford	136	130		Indv. Families - Not Eld/ Handicapped	6			
Richter Place	9101 Courtland Dr NE	Rockford	62	62		Wholly Elderly Housekeeping	0			
Rogue Valley Towers	59 South Main Street	Rockford	52	52		Elderly And Disabled	0			
Mildred Houting	35 East Maple Street	Sand Lake	32	32		Elderly	0	2020	2050	
Old Mill of Sand Lake Apartments	88 South 3rd Street	Sand Lake	16	16		Family	0			
Harvest Way Retirement Community	100 Ida Red Avenue	Sparta	45	45		Elderly	0	2015	2015	45
Sparta Townhouses	181 Clark Street	Sparta	48	48		Indv. Families - Not Eld/ Handicapped	0			
Coventry Woods	3550 Remembrance Road	Walker	101	101		Elderly	0	2020	2040	

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<b>Kingsbury Place Apartments</b>	725 North Center Drive	Walker	44	44	29	Special Needs	0	2020	2050	
<b>Walker Meadow Retirement</b>	1101 Wilson Avenue NW	Walker	42	42		Wholly Elderly Housekeeping	0	2019	2019	42
<b>Walker Village Drive</b>	1230 Walker Village Drive NW	Walker	18	18		Disabled	0			
<b>54th Street Apartments</b>	178 54th Street SW	Wyoming	4	4		Family	0	2009	2024	
<b>54th Street Apartments II</b>	180 54th Street SW	Wyoming	4	4		Family	0	2011	2036	
<b>Bayberry Farms</b>	2520 56th Street SW	Wyoming	64	64		Elderly	0			
<b>David's House</b>	2390 Banner Street SW	Wyoming	10	10		Wholly Developmentally Disa	0			
<b>Kent Residential Center</b>	3210 Gladiola Avenue SW	Wyoming	16	16		Wholly Developmentally Disa	0	2017	2017	10
<b>Oak Forest</b>	3614 Pine Oak Avenue SW	Wyoming	12	12			0	2011	2041	
<b>Pine Oak</b>	850 36th Street SW	Wyoming	127	127		Elderly	0	2019	2039	
<b>Pinery Park Apartments</b>	2300 Newstead Avenue SW	Wyoming	125	125		Partially Elderly Handicapped	0			
<b>Villa Esperanza</b>	1446 44th Street SW	Wyoming	40	40		Wholly Elderly Housekeeping	0			
<b>TOTALS</b>			<b>10,410</b>	<b>8,655</b>	<b>861</b>					<b>340</b>

# Appendix D

Grand Rapids Neighborhood Investment  
Plan Performance Measurements



**FY 2016 – 2020**  
**Neighborhood Investment (NI) Plan**  
**Performance Measures**

**Outcome 1: Improve the Condition of Existing Housing**

Activity	HUD Output Type	Outputs and Indicators
Homeowner Rehabilitation	Housing Units	<p><u>Output:</u> ____ homeowner units repaired to City Rehabilitation Standards.</p> <p><u>Indicator 1:</u> ____ homeowner units at which an exterior code violation was corrected.</p> <p><u>Indicator 2:</u> ____ homeowner units made lead safe.</p> <p><u>Indicator 3:</u> ____ homeowner units in which home health and safety hazards other than lead-based paint hazards were remediated.</p> <p><u>Indicator 4:</u> ____ average cost savings to homeowners compared to a market rate home improvement loan.</p>
Homeowner Minor Repair	Housing Units	<p><u>Output:</u> ____ housing units that receive minor home repairs.</p> <p><u>Indicator:</u> ____ Number of housing units where occupants benefit from one or more of the following:</p> <ul style="list-style-type: none"> <li>▪ Correction of a health or safety hazard</li> <li>▪ Improvement in affordability</li> <li>▪ Increase in home security</li> <li>▪ Lengthen the life of the structure</li> </ul>
Access Modifications (Homeowner and Renter)	Housing Units	<p><u>Output 1:</u> ____ housing units provided with an environmental assessment for the purpose of making recommendations for accessibility modifications.</p> <p><u>Indicator 1:</u> ____ assessed units modified to improve accessibility.</p> <p><u>Output 2:</u> ____ housing units made accessible for people with disabilities.</p> <p><u>Indicator 2:</u> ____ people with disabilities gained one or both of the following benefits:</p> <ul style="list-style-type: none"> <li>▪ Improved access into and out of the unit</li> <li>▪ Improved access within the unit.</li> </ul>
Rental Rehabilitation	Housing Units	<p><u>Output:</u> ____ rental units brought to Property Maintenance Code and City Rehabilitation standards.</p> <p><u>Indicator 1:</u> ____ rental units brought to City Property</p>

Maintenance Code standards and made lead safe.

Indicator 2: \_\_\_\_\_ rental units remain affordable for lower-income families for five (5) or more years.

## Outcome 2: Increase the Supply of Affordable Housing

<b>Activity</b>	<b>HUD Output Type</b>	<b>Outputs and Indicators</b>
Homeowner New Construction or Substantial Rehabilitation	Housing Units	<p><u>Output:</u> _____ affordable homeowner units created.</p> <p><u>Indicator 1:</u> _____ homeowner units substantially rehabilitated to applicable building code standards and made lead safe.</p> <p><u>Indicator 2:</u> _____ homeowner units newly constructed to applicable building code standards.</p> <p><u>Indicator 3:</u> _____ housing units met one or more of the following standards:</p> <ul style="list-style-type: none"><li>air infiltration rates were reduced by 20%</li><li>was eligible for LEED certification</li><li>attained HERS rating of 4 stars (rehab) or 5 stars (new construction)</li><li>Michigan Energy Code compliance</li></ul> <p><u>Indicator 4:</u> _____ homeowner units remain affordable for lower-income families for one of the following periods:</p> <ul style="list-style-type: none"><li>five (5) years</li><li>ten (10) years</li><li>fifteen (15) years</li></ul>

<b>Activity</b>	<b>HUD Output Type</b>	<b>Outputs and Indicators</b>
Renter New Construction or Substantial Rehabilitation	Housing Units	<p><u>Output:</u> _____ affordable renter units created.</p> <p><u>Indicator 1:</u> _____ renter units substantially rehabilitated to applicable building code standards and made lead safe.</p> <p><u>Indicator 2:</u> _____ renter units newly constructed to applicable building code standards.</p> <p><u>Indicator 3:</u> _____ housing units met one or more of the following standards:</p>

air infiltration rates were reduced by 20%  
was eligible for LEED certification  
attained HERS rating of 4 stars (rehab) or 5 stars (new construction)  
Michigan Energy Code compliance

Indicator 4: \_\_\_\_\_ renter units remain affordable for lower-income families for one of the following periods:

- five (5) years
- ten (10) years
- fifteen (15) years
- twenty (20) years

Indicator 5: \_\_\_\_\_ renter units that provide supportive housing for people with disabilities or other special needs populations.

Short-Term Rental Assistance

Households

Output: \_\_\_\_\_ households served with short-term rental assistance for up to six (6) months.

Indicator: \_\_\_\_\_ households who have increased accessibility to affordable housing.

### Outcome 3: Improve Access to and Stability of Affordable Housing

Activity	HUD	Output Type	Outputs and Indicators
Homebuyer Downpayment Assistance	Households		<p><u>Output:</u> _____ households received downpayment assistance to purchase their first home.</p> <p><u>Indicator 1:</u> _____ housing units remain affordable for lower-income families for five (5) years.</p> <p><u>Indicator 2:</u> _____ households whose housing costs do not exceed 40% of their income.</p>
Housing Legal Services (Homeowners and Renters)	People		<p><u>Output:</u> _____ people (households) who received legal counseling and/or representation on a housing related legal matter.</p> <p><u>Indicator:</u> _____ people who resolve their housing-related legal matter based on one of the following main benefits:</p> <ul style="list-style-type: none"> <li>Avoidance of a housing crisis</li> <li>Improvement in the quality of the person’s housing</li> <li>Removal of barriers to obtaining or retaining housing</li> <li>Increased knowledge of the legal system</li> </ul>
Fair Housing Activities	People		<p><u>Output 1:</u> _____ hours developing, marketing and conducting educational and outreach activities.</p> <p><u>Indicator 1:</u> _____ people who received fair housing education and outreach.</p> <p><u>Output 2:</u> _____ people who attended a fair housing training.</p> <p><u>Indicator 2:</u> _____ people at training who indicated they learned new and relevant information.</p> <p><u>Output 3:</u> _____ housing industry professionals who attended a fair housing training.</p> <p><u>Indicator 3a:</u> _____ housing industry professionals at training who indicated they learned new and relevant information.</p> <p><u>Indicator 3b:</u> _____ housing industry professionals at training who indicated they would modify their business practices following training.</p>

Output 4: \_\_\_\_\_ housing tests conducted to determine compliance with fair housing laws.

Indicator 4a: \_\_\_\_\_ housing tests where no evidence of discrimination was found.

Indicator 4b: \_\_\_\_\_ housing tests where evidence of discrimination was found and resolved in accordance with established criteria.

Homelessness Prevention and Rapid Re-Housing      People

Output: \_\_\_\_\_ people completed an Intake Assessment as the first step to creating a plan to resolve homelessness.

Indicator: Of the \_\_\_\_\_ people (\_\_\_\_\_ households) assessed, \_\_\_\_\_ people (\_\_\_\_\_ households) will increase their knowledge about actions they can take to begin to address their housing crisis.

## Outcome 4: Reduce Blight and Code Violations

Activity	HUD Output Type	Outputs and Indicators
Code Compliance (Homeowner and Renter)	Housing Units	<p><u>Output:</u> _____ code violation cases continued or initiated.</p> <p><u>Indicator 1:</u> _____ housing units brought into compliance with one or more of the following:</p> <ul style="list-style-type: none"><li>Property Maintenance Code</li><li>Nuisance Code</li><li>Zoning Ordinance</li><li>Historic Preservation Standards.</li></ul> <p><u>Indicator 2:</u> _____ vacant/abandoned housing units returned to productive use.</p>

## Outcome 5: Increase Civic Engagement and Public Safety

Activity	HUD Output Type	Outputs and Indicators
Crime Prevention	People	<p><u>Output 1:</u> _____ people (households) who received training on personal safety and/or safety design features and practices for their homes (home security survey, CPTED).</p> <p><u>Indicator 1a:</u> _____ people (households) who reported feeling safer in their home and/or community as a result of the training.</p> <p><u>Indicator 1b:</u> _____ housing units received safety improvements.</p> <p><u>Output 2:</u> _____ people, businesses, or organizations educated on public safety design features and practices for non-residential and public spaces.</p> <p><u>Indicator 2:</u> _____ non-residential/public space locations where public safety design features or practices were implemented.</p> <p><u>Output 3:</u> _____ significant public safety issues (e.g. gangs, drug sales) identified in the neighborhood.</p> <p><u>Indicator 3:</u> _____ significant public safety issues (e.g. gangs, drug sales) successfully resolved for at least 6 months.</p>

## Outcome 5: Increase Civic Engagement and Public Safety (continued)

HUD		
Activity	Output Type	Outputs and Indicators
Neighborhood Leadership	People	<p><u>Output 1:</u> _____ people receiving leadership, board responsibility, and/or other capacity building training.</p> <p><u>Indicator 1a:</u> _____ people who reported increased knowledge about leadership, board responsibility, and/or other capacity building skills.</p> <p><u>Indicator 1b:</u> _____ people who became actively involved in a neighborhood, community, and/or City board or committee.</p> <p><u>Output 2:</u> _____ people who had access to opportunities for volunteering in their neighborhood.</p> <p><u>Indicator 2a:</u> _____ people actively engaged in activities that resulted in an improved neighborhood condition.</p> <p><u>Output 3:</u> _____ property owners contacted to resolve a nuisance and/or exterior housing code violation.</p> <p><u>Indicator 3a:</u> _____ properties brought into compliance with nuisance and/or exterior housing code through self compliance.</p>

## Outcome 6: Enhance Infrastructure and Public Facilities

HUD		
Activity	Output Type	Outputs and Indicators
Street Improvements	People	<p><u>Output:</u> _____ residential street segments improved.</p> <p><u>Indicator:</u> _____ people who benefited from improved access to their street and an improved neighborhood as a result of street improvements.</p>
Street Improvements Sidewalk Ramp Replacement (ADA Standards)	People	<p><u>Output:</u> _____ non-compliant curb ramps reconstructed to ADA standards.</p> <p><u>Indicator:</u> _____ people who gained increased access to their neighborhood as a result of ADA improvements.</p>
Park and Recreation Facilities	People	<p><u>Output:</u> _____ park or recreational facilities improved or developed.</p> <p><u>Indicator:</u> _____ people who benefited from an improved neighborhood as a result of park or recreational</p>

		improvements.
Public Facility and Infrastructure Improvements	People	<p><u>Output:</u> _____ public facility or public infrastructure improvements completed.</p> <p><u>Indicator:</u> _____ people who benefited from an improved neighborhood as a result of public facility or infrastructure improvements.</p>
Tree Planting	People	<p><u>Output:</u> _____ trees planted in rights-of-ways or on other public property.</p> <p><u>Indicator:</u> _____ people who benefited from an improved neighborhood as a result of tree planting.</p>

**Outcome 7: Increase Access to Jobs, Education and Other Services.**

HUD		
Activity	Output Type	Outputs and Indicators
Transportation and public services	People	<p><u>Output:</u> _____ people who received transportation or other support to access jobs, education, health and wellness, recreation, and health and social service activities.</p> <p><u>Indicator:</u> _____ People with increased access to jobs, education, health and wellness, recreation, and health and social service activities.</p>

**Outcome 8: Increase Economic Opportunities**

HUD		
Activity	Output Type	Outputs and Indicators
Job Training and job readiness training	People	<p><u>Output:</u> _____ people who received job training or job readiness training.</p> <p><u>Indicator:</u> _____ people who reported they benefited from job training or job readiness training.</p>

## Other

Activity	HUD Output Type	City Outputs and Indicators
Admin/Planning	N/A	<p><u>Output:</u> _____ Consolidated Program Application (formerly Exhibit One) and Grand Rapids Area Housing Continuum of Care documents completed in a form required by the federal, state and local government for funding.</p> <p><u>Indicator:</u> _____ funding allocations received for disbursement in the community.</p>

\*Additional performance measures may be developed for identified priority needs.

# Appendix E

ESG Financial Guidelines

**City of Grand Rapids  
Emergency Solutions Grants Program  
Financial Assistance Guidelines**

	<b>Prevention</b> <i>Homeless Categories 2-4, At Risk of Homeless Categories 1-3</i>	<b>Rapid Re-Housing</b> <i>Homeless Category 1</i>	<b>Guidance</b> <i>Payments issued to a third party.</i>
<b>Coordinated Assessment</b>	Required for all prevention services.	Required for all Rapid Re-housing services.	Homeless providers shall only accept referrals from coordinated assessment and refer all households seeking assistance to coordinated assessment for initial assessment (Domestic Violence agencies shall use local crisis assessment protocol). Homeless service providers share information regarding program eligibility and availability with coordinated assessment, which in turn refers eligible households to the appropriate resources.
<b>Rental Arrearages</b>	Available <ul style="list-style-type: none"> <li>▪ Not to exceed three (3) months</li> </ul>	Not available	<ul style="list-style-type: none"> <li>▪ Any combination of direct financial assistance not to exceed six (6) months during any one year period</li> <li>▪ Households shall have an annual income below 30% of the median family income.</li> <li>▪ Units cannot exceed HUD Fair Market Rent.</li> </ul>
<b>Short-Term Rental Assistance</b>	Available <ul style="list-style-type: none"> <li>▪ Not to exceed three (3) months</li> <li>▪ Households must have an annual income below 30% of the median family income</li> </ul>	Available <ul style="list-style-type: none"> <li>▪ Not to exceed three (3) months</li> <li>▪ Households must have an annual income below 30% of the median family income</li> </ul>	<ul style="list-style-type: none"> <li>▪ Cannot be used with other subsidies.</li> <li>▪ Any combination of direct financial assistance not to exceed six (6) months during any one year period.</li> <li>▪ Lease agreement required.</li> <li>▪ HQS Inspection in accordance with Shelter and Housing Standards 24 CFR 576.403 required before assistance is provided.</li> <li>▪ Households shall pay a rental subsidy as determined by the housing plan using a declining subsidy model.</li> <li>▪ Monthly case management provided by qualified case management required.</li> <li>▪ Housing stabilization plan shall be entered into HMIS.</li> <li>▪ Units cannot exceed HUD Fair Market Rent.</li> </ul>

	<b>Prevention</b> <i>Homeless Categories 2-4, At Risk of Homeless Categories 1-3</i>	<b>Rapid Re-Housing</b> <i>Homeless Category 1</i>	<b>Guidance</b> <i>Payments issued to a third party.</i>
<b>Medium-Term Rental Assistance</b>	Available <ul style="list-style-type: none"> <li>Not to exceed six (6) months</li> <li>Households must have an annual income below 30% of the median family income</li> </ul>	Available <ul style="list-style-type: none"> <li>Not to exceed six (6) months</li> <li>Households must have an annual income below 30% of the median family income</li> </ul>	<ul style="list-style-type: none"> <li>Cannot be used with other subsidies.</li> <li>Any combination of direct financial assistance not to exceed six (6) months during any one year period.</li> <li>Households shall pay a rental subsidy as determined by the housing plan using a declining subsidy model.</li> <li>Income eligibility must be recertified after three (3) months of assistance.</li> <li>Lease agreement required.</li> <li>HQS Inspection in accordance with Shelter and Housing Standards 24 CFR 576.403 required before assistance is provided.</li> <li>Monthly case management provided by qualified case management staff required.</li> <li>Housing stabilization plan must be entered into HMIS.</li> <li>Units cannot exceed HUD Fair Market Rent.</li> </ul>
<b>Security Deposit</b>	Available	Available	Not to exceed one-month's rent.
<b>Utilities</b>	Available; arrearage requires shut off notice	Available; arrearage available if enabling utilities to be turned on at new address	Any combination of prevention or rapid re-housing assistance not to exceed \$1,500 per household per year.
<b>Legal Assistance</b>	Not Available	Not Available	
<b>Mortgage Arrearages Including Land Contracts or Utilities</b>	Not Available	Not Available	
<b>Hotel/Motel Vouchers</b>	Not Available	Not Available	
<b>Lead-Based Paint Inspections</b>	Required for all prevention services if the household has a child under the age of six (6) and if the property was built prior to 1978	Required for all Rapid Re-housing services if the household has a child under the age of six (6) and if the property was built prior to 1978	

	<b>Prevention</b> <i>Homeless Categories 2-4, At Risk of Homeless Categories 1-3</i>	<b>Rapid Re-Housing</b> <i>Homeless Category 1</i>	<b>Guidance</b> <i>Payments issued to a third party.</i>
<b>Rent Reasonableness</b>	Required for arrearages and rental assistance	See HUD Rent Reasonableness Form.	
<b>Strength-Based Case Management Services</b>	Required for all prevention services with the exception of arrearages	Required for all Rapid Re-housing services	The case manager provides services within the strengths-based approach to enhance a participant's housing stability, promote linkages to community resources, and assist the household with the development of a homeless risk prevention plan.

Homeless service providers agree to only accept referrals from the coordinated assessment system and refer all households seeking assistance to the coordinated system for assessment. Coordination among homeless service providers allows for consistent assessment and community targeting. Homeless service providers share information regarding program eligibility and availability with the Housing Assessment Program (HAP), which in turn refers eligible households to the appropriate resources.

# Appendix F

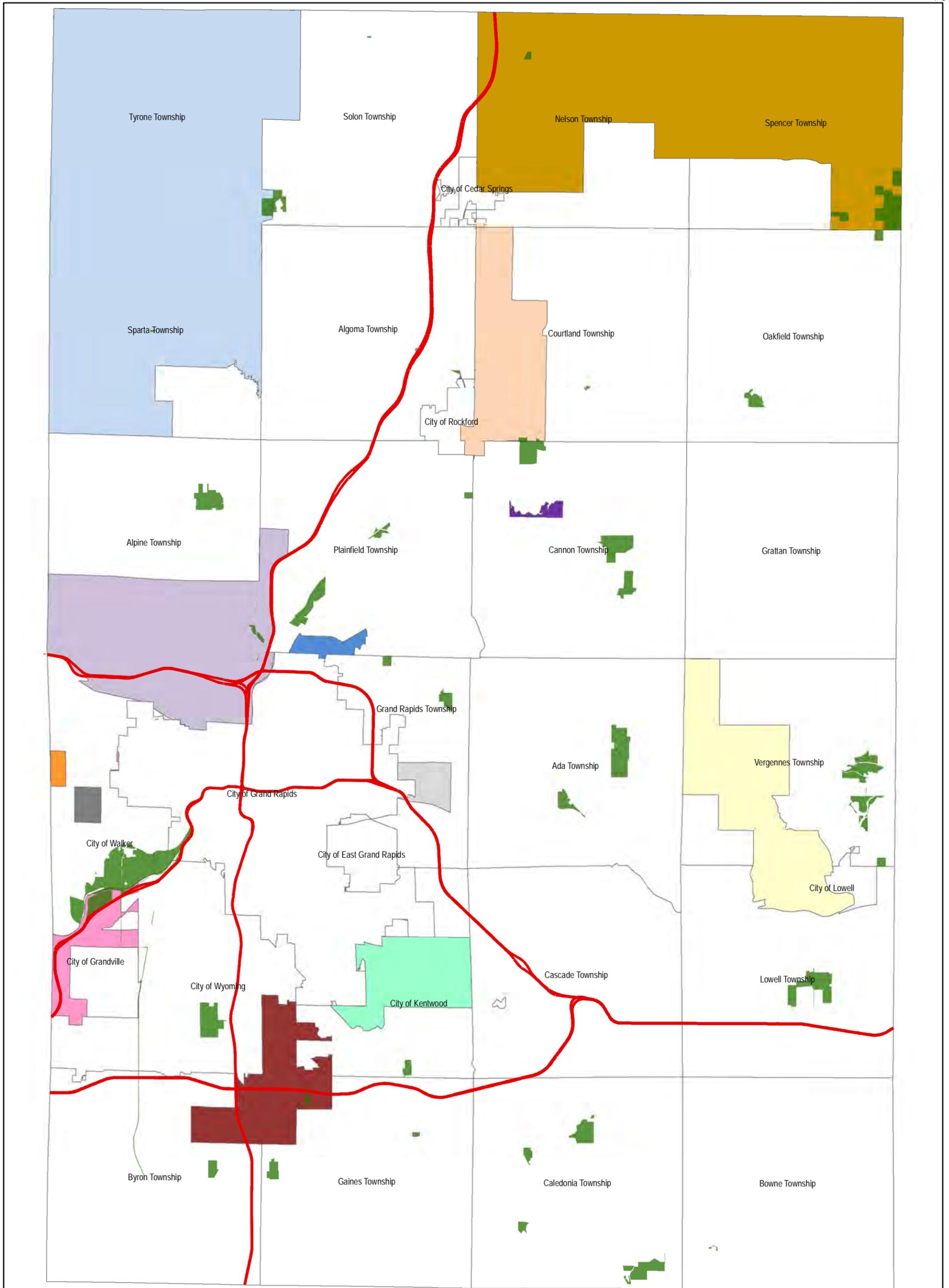
Kent County  
Potential CDBG Target Areas 2016



# Kent County Potential CDBG Target Areas 2016



LOWMOD >= 39.06%



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