

Contributing Factors

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

Identifying and Prioritizing Contributing Factors to Segregation

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

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

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

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

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

Private discrimination

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

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

Identifying and Prioritizing Contributing Factors to R/ECAP areas

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

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

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

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Identifying and Prioritizing Contributing Factors to Disparities in Access to Opportunity

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

The A-Ride service from Ann Arbor Area Transportation Authority also provides shared-ride transportation service for persons with disabilities. This service is available for individuals within ¼ mile of fixed route service and available. Additionally, A-Ride is available for ADA eligible residents of Ypsilanti, Pittsfield and Superior Townships who reside beyond the Base Service Area. These riders may request trips to locations within their township on weekdays between 6:30 a.m. and 6:30 p.m. Additional funding permits:

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

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

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

Lack of private investments in specific neighborhoods

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

Medium - Increasing private investment in low-market areas is difficult, as the return on investment will be lower.

However, coordinating investment with local bank Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.

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

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

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

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

Identifying and Prioritizing Contributing Factors to Factors for Disproportionate Housing Needs

Contributing Factor	Prioritization and Justification
<p>Displacement of residents due to economic pressures A few factors are at play with concerns about displacement. As frequently discussed in the 2015 Housing Affordability and Economic Equity Analysis, high housing prices in the Ann Arbor area are pushing many households out of Ann Arbor, often to the east side of the county, specifically in Ypsilanti and Ypsilanti Township. The high cost of housing, due in large part to the presence and dominance of the U of M and its hospital system, impacts renters and homeowners alike.</p> <p>In some cases, loss of committed affordable units has also caused displacement. Of current concern is the Cross Street Village in the City of Ypsilanti. Cross Street Village is an affordable senior living facility where the property owners have completed the 15-year mandatory affordability period, but are</p>	<p>High - As noted in the Housing Affordability and Economic Equity report (2015) there are two markets in play - a high cost/high income market in Ann Arbor and a lower rent/much lower income problem in both the City of Ypsilanti and Ypsilanti Township. To prevent displacement, an emphasis on raising incomes and decreasing the unemployment rate is the goal for both R/ECAPs and other low opportunity areas and areas with high percentages of residents of color in the county.</p>

<p>opting out of the 99-year extended affordability period by using the IRS Qualified Contract exemption that allows them to “list” the property for sale. Based on the calculation involved, the property is listed for sale at \$12,050,000, significantly higher than its appraisal of \$4 million. While the affordability period will extend 3 years, current tenants are seeing rent increases and are concerned about how long they will be able to stay. Many are already looking to relocate and are finding few affordable options.</p> <p>The Ypsilanti Housing Commission’s Rental Assistance Demonstration (RAD) conversion is having a positive impact on neighborhoods due to the renovation of all units, including demolition and redevelopment in some cases. These properties moved out of public ownership to a public/private partnership to allow the use of Low-Income Housing Tax Credits to fund renovation and redevelopment. The total affordability period for these properties is 45 years once construction is complete.</p> <p>The Ann Arbor Housing Authority is also in the middle of a full RAD conversion, but the AAHA/City of Ann Arbor are maintaining ownership of the land to control long-term affordability for those properties. The City of Ann Arbor provided a 99 year ground lease to the entity developing the property. In both cases, long-term planning will be needed to maintain affordability at either the 45 or 99 year point.</p>	
<p>Lack of private investments in specific neighborhoods The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.</p> <p>Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.</p>	<p>Medium - Increasing private investment in low-market areas is difficult, as the return on investment will be lower.</p> <p>However, coordinating investment with local bank Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.</p>

<p>Lack of public investments in specific neighborhoods, including services or amenities</p> <p>Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to its age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.</p> <p>The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.</p> <p>Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.</p> <p>Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.</p>	<p>High - Review use of CDBG priority funds as part of 5 year consolidated plan preparation to emphasize use for placemaking and/or community infrastructure needs in low-opportunity areas.</p> <p>This will allow additional public support for these efforts, that are often underfunded due to the imbalanced local government revenues.</p>
<p>Land use and zoning laws</p> <p>Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan</p>	<p>High - exclusionary zoning practices including large acre lot sizes, large single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor area.</p>

<p>Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.</p> <p>Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	
<p>Lending Discrimination</p> <p>The recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA). African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.</p> <p>Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.</p>	<p>Medium - HMDA data provides a look into loan origination and approval by race and ethnicity. African Americans are turned down more frequently than whites.</p> <p>Middle and upper income families (often white) are often steered or request to be look for housing in the Ann Arbor School District.</p>

Identifying and Prioritizing Contributing Factors to Factors for Publicly Supported Housing

Contributing Factor	Prioritization and Justification
<p>Land use and zoning laws</p> <p>Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of</p>	<p>High - Exclusionary zoning practices including large acre lot sizes, large single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor</p>

<p>taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.</p> <p>Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	<p>area.</p>
<p>Community Opposition Community opposition is common when there are proposals for specific developments looking to add affordable housing or when there are proposed zoning changes to add residential density. While these changes in high opportunity could help offset some of the push of lower income (often African American) households to the east side, they continue to be difficult to implement. In continuation of this vicious cycle, lower income households are then pushed out of the east side as more people relocate to the east side, potentially raising cost of living and rents throughout the east side. It is also important to note that the community opposition is not exclusive to high-opportunity markets and is in play throughout the county.</p> <p>The opposition to affordable housing sometime takes the form of “green or environmental” concerns. When pressed, the conversation usually sources concerns related to safety, the increase in low-income households, and concerns about different races moving into the neighborhood.</p> <p>A smaller, but persistent, way this opposition also plays out is in the location of group group housing that provides support and treatment for persons with disabilities and/or substance abuse issues.</p>	<p>High - While support is broad for affordable housing in theory, individual projects at specific locations continue to face opposition, as do efforts to increase residential density.</p> <p>Ongoing education, outreach and development of advocates to support, rather than oppose these developments, will be essential to success.</p>
<p>Impediments to mobility Households using Housing Choice Vouchers (HCV) in the area find that market rents limit where they can find rental housing. Fair Market Rent (FMR) rates do not cover the cost of most rentals in Ann Arbor (even when increased to 110% of value),.and also create a detrimental situation on the east side</p>	<p>High - Many voucher-holding households are being priced out of Ann Arbor simply due to rents exceeding fair market value of the voucher. As a result, many are pushed east, and concentrated in specific neighborhoods with less access to employment,</p>

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

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

<p>community's neighborhood strategic plan, however applicants have frequently noted that it's not clear how to meet this standard.</p>	
<p>Source of income discrimination The Fair Housing Center of Southeast and Mid Michigan (FHC) notes that some housing providers and banks do not appropriately consider income, including SSI, Social Security, retirement and other incomes.</p>	<p>Medium - FHC has noted that this is a fairly common occurrence, sometimes due to misinformation but other times done more deliberately.</p>

Identifying and Prioritizing Contributing Factors of Disability and Access Issues

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

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

<p>The prevalence of single-family zoning districts makes up the bulk of zoning districts throughout the region and limits the housing choices, price point and availability to populations most in need of housing. In some cases, there have been efforts to limit the number of affordable units or use of HCV through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p> <p>As part of the prevalence of single family districts, there are limitations on group home placement. There are often negative associations with group housing and similar housing types, making it difficult to have them approved even as a conditional or special use.</p>	<p>support recommendations to local jurisdictions. Education and advocacy can help residents understand the need for group homes and other similar supportive housing types.</p>
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Identifying and Prioritizing Contributing Factors of Fair Housing Enforcement, Outreach Capacity and Resources Contributing Factors

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

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

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

Fair Housing Goals

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

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

Goal 1: Align development practices and policies to encourage more affordable housing development in high market areas

Discussion: Policy and regulation decisions can either ease or make more difficult the ability to develop affordable housing. These strategies are intended to improve the process throughout zoning, policy, and other regulatory changes.

Strategies	Priority/Timeframe of Action	Measure of Achievement
Zoning:		
1.1 Encourage accessible affordable housing units near transit or other key services at activity centers through zoning changes e.g. Transit-oriented developments (TOD)	Medium/High Priority 1-2 years	Review of ordinances and/or draft ordinances. City of Ann Arbor expecting to draft ordinances changes by spring 2018
1.2 Support local units to implement zoning strategies to develop housing products (i.e. duplexes, accessory dwelling units) in single-family neighborhoods	Low Priority 1-5 years	Issue discussed by relevant governing bodies (board and/or commissions) and/or drafted ordinance changes
Policy:		
1.3 Encourage the use of publicly owned land in high opportunity markets for affordable housing or proceeds go toward affordable housing development	Medium Priority 1-5 years	Review of locations and ownership of public land (could include school, university or other public agencies). Could include identification of parcels for disposition
1.4 Prioritize public subsidies/incentives (i.e. brownfield development) for affordable housing developments in high opportunity markets	Medium Priority 1-5 years	Review and/or changes to policies related to incentives or subsidies.
1.5 For publicly supported housing, coordinate rental inspection process between HUD, MSHDA, and local regulations to avoid duplicative administrative burden	Low Priority 1-5 years	Review requirements and potential overlap between inspecting agencies. Potentially change inspection policy in relevant local units.

Contributing Factors: Lack of affordable, accessible housing in a range of unit sizes; Location and type of affordable housing; Land use and zoning laws; Community opposition

Fair Housing Issues: Disproportionate Housing Needs; Segregation/Integration

Responsible Program Participants: Reimagine Washtenaw, City of Ann Arbor, City of Ypsilanti, local units, OCED, WCRBA

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

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

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

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

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

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

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

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

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

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

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

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

Goal 4: Add and preserve affordable housing stock

Discussion: The need to add and preserve affordable housing stock is universally agreed upon among local units. Strategies below support the goals developed from the 2015 Housing Affordability and Economic Equity Analysis.

Strategies	Priority/Timeframe of Action	Measure of Achievement
4.1 Develop strategy to maintain affordability for rental housing that is reaching the end of their affordability period (LIHTC)	High Priority 1-5 years	Inventory completed. Plan developed for intervening when possible..
4.2 Track inventory of committed affordable units in Ann Arbor, Pittsfield Township, City of Ypsilanti and Ypsilanti Township	High Priority Ongoing	Make additions and subtractions annually, and making net changes public.
4.3 Explore strategies to preserve affordability (e.g. community land trusts)	Medium Priority 1-5 years	Explore strategies like community land trusts (specifically Baltimore and other low market areas).
4.4 Explore strategies to create regular funding stream for affordable housing fund(s)	High Priority 1-5 years	Determine options, explore implementation of each with both City of Ann Arbor, Washtenaw County and others.
4.5 Track progress of goals from Housing Affordability and Economic Equity Analysis Report, specifically to: <ul style="list-style-type: none"> • Add 140 units per year in City of Ann Arbor • Add 17 units per year in Pittsfield Township • Add/grow 69 College-educated residents per year in City of Ypsilanti • Add/grow 140 College-educated residents per year in Ypsilanti Township 	High Priority 1-5 years (20 year goal)	Affordable Hourdable/Equity Leadership team creates annual reports for implementation of plan <ul style="list-style-type: none"> • Continue creation of annual work plan • Track successes and challenges • Track overall progress with broad goal as well
4.6 Encourage local units to request affordable units in new residential developments.	Low priority 1-5 years	Connect with development leads at local units in the urbanized area to support their work to include affordable units in residential development.

Contributing Factors: The availability of affordable units in a range of sizes; Lack of affordable, accessible housing in a range of unit sizes; Location and type of affordable housing; Displacement of residents due to economic pressures; Community opposition

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

Responsible Program Participants: OCED; City of Ann Arbor; Pittsfield Township; City of Ypsilanti; Ypsilanti Township

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

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

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

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

Contributing Factors: Location of employers; Community revitalization strategies

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Goal 9: Improve transportation options in low opportunity areas

Discussion: Transportation is essential to employment and education opportunities as well as quality of life. Strategies below capitalize on existing partnerships with local units and organizations, as well as the Ann Arbor Area Transportation Authority (AAATA), in efforts to improve access to transportation.

Strategies	Priority/Timeframe of Action	Measure of Achievement
9.1 Support partnerships between local governments, private employers, anchor institutions, and neighborhood organizations to develop transportation options that connect low income and protected populations living in concentrated areas of poverty with job opportunities	Medium Priority 1-5 years	Exploration of other options is considered through both formal and information means. Additional transportation options provided.
9.2 Collaborate with The Ride service to evaluate how transit meets needs for residents in low opportunity areas	High Priority 1-5 years	Review of recent changes completed by The Ride and adjustments made. The Ride develops operational interpretations and metrics for their recent goal change "People throughout the Area have equitable access to opportunity through AAATA services"
9.3 Encourage planning and implementation for multi-modal transportation with emphasis on non-motorized linkages	Medium Priority 1-5 years	Regional non-motorized plans receive regular updates. County supports grant applications for multi-modal transportation and non-motorized linkages.

Contributing Factors: Access to transportation for persons with disabilities; The availability, type, frequency, and reliability of public transportation; Inaccessible buildings, sidewalks, pedestrian crossings, and other infrastructure; Location of accessible housing; Location and type of affordable housing

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

Responsible Program Participants: AAATA, WATS, RTA, Anchor institutions, Local units, Neighborhood Associations

Goal 10: Create and maintain ongoing resident engagement in R/ECAPs and low opportunity areas

Discussion: Outreach for AFH helped engage key segments of the county, but ongoing engagement is essential to fair housing and equity.

Strategies	Priority/Timeframe of Action	Measure of Achievement
10.1 Expand role of Community Action Board resident members to increase two-way flow of communication	High Priority Annually	CAB board members regularly provide updates to community. CAB board members share neighborhood efforts with peers on CAB and Board of Commissioners.
10.2 Connect with residents and stakeholders in areas where outreach was limited, including: Leforge, MacArthur, and Whitmore Lake	Medium Priority 1-5 years	Events held in each community; ongoing communications through Urban County members and neighborhood leaders/ambassadors.
10.3 Support and utilize Washtenaw Public Health neighborhood liaisons	Medium Priority Ongoing	Ensure regular updates from Public Health Neighborhood liaisons are shared with OCED to help inform outreach and program/policy efforts.
10.4 Explore translation services related to outreach for Hispanic/Latino communities, Chinese communities, and other LEP populations	Low Priority 1-5 years	Assess local units' capacity to provide services and materials in languages for our top LEP populations, starting with City of Ann Arbor and Washtenaw County.

Contributing Factors: Lack of community revitalization strategies; Lack of public investment in specific neighborhoods, including services or amenities

Fair Housing Issues: RECAPs; Segregation/Integration; Disparities in Access to Opportunity; Outreach Capacity and Resources Analysis

Responsible Program Participants: Community Action Board, Washtenaw County Public Health, OCED, Local units, Neighborhood Association, WICIR