

2021  
REGIONAL  
ANALYSIS OF IMPEDIMENTS TO  
FAIR HOUSING CHOICE

Kent County  
City of Grand Rapids



## Contents

Section 1: Introduction and Executive Summary.....	1
Study Authors.....	3
Community Engagement.....	4
Fair Housing Survey Results.....	4
Methodology Used.....	5
Source of Funding for the Study.....	5
Conclusions and Impediments Overview.....	6
Section 2: jurisdictional background data.....	7
Demographic Data.....	9
Population.....	9
Age.....	13
Gender.....	13
Households.....	14
Disability.....	15
Education.....	16
Income.....	22
Poverty.....	24
Employment.....	30
Unemployment.....	36
Commute.....	39
Public Transit.....	40
Housing Profile.....	45
Affordable Housing.....	50
Homeownership.....	57
Lending.....	65
Housing Conditions.....	73
Other Severe Housing Problems.....	76
Publicly Supported Housing.....	79
Other Relevant Data.....	87
Grocery/Fresh Food.....	87
Schools.....	89
Computer/Internet.....	90
Public Safety.....	92
Recreation.....	94
Infrastructure.....	98

Small/Micro-Business Development .....	98
Access to Healthcare.....	102
Spectrum Community Health Needs Assessment .....	105
Impact of COVID-19 .....	105
Section 3: Identification of Impediments to Fair Housing Choice.....	107
Public Sector .....	107
Zoning and Site Selection.....	107
Neighborhood Revitalization, Municipal and Other Services, Employment, Housing, Transportation Linkage.....	107
PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures, Housing Choices for Certificate and Voucher Holders.....	108
Sale of Subsidized Housing and Possible Displacement .....	108
Property Tax Policies .....	108
Planning and Zoning Boards .....	109
Building Codes (Accessibility) .....	109
Fair Housing Ordinance .....	109
Public and Private Sector .....	110
Fair Housing Enforcement .....	110
Informational Programs.....	110
Visitability in Housing.....	111
Noncompliance by HUD .....	111
Section 4: Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction .....	112
Evaluation of Jurisdiction’s Current Fair Housing Legal Status .....	115
Fair Housing Complaints and Compliance Reviews .....	117
Review of the Status of 2016-2021 Impediments to Fair Housing Choice .....	120
Section 5: Conclusions and Recommendations.....	120
2021-2025 Fair Housing Action Plan .....	122
Section 6: Chief Elected Official Signature Page.....	124

**List of Tables and Figures**

Table 1: Population Projections .....	9
Table 2: 2020 Estimated Population by Race and Ethnicity.....	10
Table 3: Median Age .....	13
Table 4: Age.....	13
Table 5: Gender .....	13
Table 6: Households by Race/Ethnicity .....	14
Table 7: 2019 Households in Grand Rapids and Kent County .....	14
Table 8: Disability Type .....	16
Table 9: Educational Attainment – High School and Bachelor’s Degree.....	16
Table 10: Educational Attainment.....	17
Table 11: Grand Rapids Educational Attainment by Age .....	17
Table 12: Kent County Educational Attainment by Age .....	18
Table 13: Grand Rapids Educational Attainment by Age and Gender .....	19
Table 14: Kent County Educational Attainment by Age and Gender .....	20
Table 15: Grand Rapids Educational Attainment by Race/Ethnicity.....	20
Table 16: Kent County Educational Attainment by Race/Ethnicity .....	21
Table 17: Median Income by Race/Ethnicity .....	23
Table 18: 2019 Household Income .....	23
Table 19: Income Assistance by Type .....	24
Table 20: 2019 Poverty Thresholds.....	25
Table 21: Ratio of Income to Poverty.....	25
Table 22: Grand Rapids and Kent County Population Below Poverty.....	26
Table 23: Grand Rapids-Wyoming, MI and Kent County Living Wage Calculator .....	30
Table 24: Top Ten Employers in the Grand Rapids MSA .....	31
Table 25: 2007 – 2017 Grand Rapids Change in Jobs by Industry.....	32
Table 26: 2007 – 2017 Kent County Change in Jobs by Industry .....	33
Table 27: Grand Rapids Total Jobs Compared to Resident Held Jobs.....	34
Table 28: Kent County Total Jobs Compared to Resident Held Jobs .....	35
Table 29: Grand Rapids and Kent County Unemployment.....	36
Table 30: Unemployment by Race/Ethnicity.....	36
Table 31: Labor Force Participation by Race/Ethnicity .....	37
Table 32: Labor Force Participation by Gender.....	37
Table 33: 2014-2018 Grand Rapids and Kent County Work Commute Times .....	39
Table 34: Housing Profile.....	45
Table 35: Grand Rapids and Kent County Gross Rent.....	50
Table 36: Housing Cost Burden – Grand Rapids.....	51
Table 37: Income by Cost Burden (Owners and Renters) – Grand Rapids.....	51
Table 38: Housing Cost Burden by Income (Renters) – Grand Rapids .....	52
Table 39: Housing Cost Burden by Income (Owners) – Grand Rapids.....	52
Table 40: Housing Cost Burden – Kent County .....	52
Table 41: Housing Cost Burden by Income (Renters and Owners) – Kent County .....	53
Table 42: Housing Cost Burden by Income (Renters) – Kent County.....	53
Table 43: Housing Cost Burden by Income (Owners) – Kent County .....	53
Table 44: FY 2020 Income Limits .....	56
Table 45: Fair Market Rent by Number of Units.....	56
Table 46: Rental Cost for a Family of Three or Four Based on Income Level.....	57
Table 47: Homeownership Rate by Race/Ethnicity .....	58
Table 48: Kent County Top Mortgage Lenders (all loans).....	68
Table 49: Kent County Top Home Purchase Lenders .....	69

Table 50: Kent County Loan Types by Lender.....	70
Table 51: HUD Subsidized Units in Kent County.....	79
Table 52: Selected Tenant Characteristics of HUD Subsidized Units.....	80
Table 53: 2019 Grand Rapids and Kent County School Graduation Rates.....	89
Table 54: No Internet Access Based on Income.....	90
Table 55: 2015 – 2019 Homicides.....	92
Table 56: Grand Rapids – Part 1 Violent Crime.....	92
Table 57: Kent County – Part 1 Violent Crime.....	94
Table 58: Grand Rapids Firms.....	98
Table 59: Kent County Firms.....	99
Table 60: Kent County LMI and Minority Bank Branches.....	100
Table 61: Protected Classes.....	115
Table 62: Grand Rapids Fair Housing Case Outcome.....	117
Table 63: Grand Rapids Fair Housing Case Type.....	117
Table 64: Grand Rapids Fair Housing Case Basis.....	118
Table 65: Kent County Fair Housing Case Outcome.....	118
Table 66: Kent County Fair Housing Case Type.....	119
Table 67: Kent County Fair Housing Case Basis.....	119
Figure 1: Concentration of Black Households.....	11
Figure 2: Concentration of Hispanic Households.....	12
Figure 3: Grand Rapids Households.....	15
Figure 4: Kent County Households.....	15
Figure 5: Grand Rapid Educational Attainment by Age.....	17
Figure 6: Kent County Educational Attainment by Age.....	18
Figure 7: Grand Rapids Educational Attainment by Age and Gender.....	19
Figure 8: Kent County Educational Attainment by Age and Gender.....	20
Figure 9: Grand Rapids Educational Attainment by Race/Ethnicity.....	21
Figure 10: Kent County Educational Attainment by Race/Ethnicity.....	22
Figure 11: Kent County and Grand Rapids Percent of Households Below Poverty Level.....	27
Figure 12: Kent County Poverty by Age and Gender.....	28
Figure 13: Grand Rapids R/ECAP Areas and Neighborhoods of Focus.....	29
Figure 14: Wage by Gender in Common Jobs.....	30
Figure 15: Grand Rapids and Kent County Labor Market Engagement.....	38
Figure 16: Grand Rapids Means of Transportation to Work.....	39
Figure 17: Kent County Means of Transportation to Work.....	40
Figure 18: Public Transportation System.....	42
Figure 19: Grand Rapids and Kent County Low Transportation Cost Index.....	44
Figure 20: Grand Rapids Renter Households.....	46
Figure 21: Grand Rapids Owner Households.....	47
Figure 22: Kent County Percent Renter Occupied Households.....	48
Figure 23: Kent County Percent Owner Occupied Households.....	49
Figure 24: Kent County Renter Occupied Households with 50% or Greater Cost Burden.....	54
Figure 25: Kent County Owner Occupied Households with 50% or Greater Cost Burden.....	55
Figure 26: Home Purchase Lending by Neighborhood Income.....	59
Figure 27: Home Purchase Lending by Borrower Race.....	60
Figure 28: Kent County Majority Minority and LMI Neighborhood Demographics.....	61
Figure 29: Lending by Race and Income of the Borrower.....	62
Figure 30: Grand Rapids and Kent County Homeownership by Race and Ethnicity.....	63

---

Figure 31: Kent County Loan Denial Rates .....	64
Figure 32: Kent County Loan Denial Reasons.....	65
Figure 33: Grand Rapids Homeowners Loan Corporation (HOLC) Redlining Map .....	67
Figure 34: Total Number of Loans in Kent County.....	71
Figure 35: Kent County Minority Lending Among Top Lenders.....	71
Figure 36: Kent County LMI Area Lending Among Top lenders .....	72
Figure 37: Loan Types in Kent County by Income and Race of the Borrower .....	73
Figure 38: Kent County Percent of Units Built Prior to 1979 with Child Under 6 .....	75
Figure 39: Grand Rapids Percent of Households with Severe Housing Problems .....	77
Figure 40: Kent County Percent of Households with Severe Housing Problems.....	78
Figure 41: Grand Rapids Publicly Assisted Housing Developments .....	82
Figure 42: Kent County Publicly Assisted Housing Developments.....	83
Figure 43: Grand Rapids Percent of Households with Housing Choice Vouchers by Tract.....	85
Figure 44: Kent County Percent of Households with Housing Choice Vouchers by Tract .....	86
Figure 45: Grocery and Supermarket Locations.....	88
Figure 46: Michigan On-Time Graduation Rate by Race/Ethnicity .....	89
Figure 47: Percent of Households without Internet Connection.....	91
Figure 48: Grand Rapids Wards .....	93
Figure 49: 2020 Grand Rapids Crimes by Neighborhood.....	94
Figure 50: Grand Rapids Access to Parks or Green Space – 10- Minute Walk .....	96
Figure 51: Kent County Access to Parks or Green Space – 10- Minute Walk.....	97
Figure 52: Bank Presence by Asset Size and Branch Network.....	99
Figure 53: Bank Branch Locations by Neighborhood Income .....	101
Figure 54: Bank Branches by Race.....	102
Figure 55: Grand Rapids Percent Uninsured .....	103
Figure 56 Percent Uninsured in Kent County.....	104

## Section 1: Introduction and Executive Summary

In *“The Color of Law”* by David Rothstein, he provided an overview of how government policies and practices intentionally created hyper-segregated communities with concentrated poverty. Residents of these communities were primarily Black and ethnic minorities. The impact of one such policy, redlining, persists today as many of these communities still have few opportunities with low educational attainment, limited access to health care and jobs, are home to food deserts, high crime, and plagued with many other characteristics that exacerbate disparities between Blacks and Whites. Redlining is the practice of denying a creditworthy applicant a loan for housing in a certain neighborhood, even though the applicant may otherwise be eligible for the loan. Grand Rapids did not differ from other communities that upheld discriminatory housing policies and practices.

In 1940, the Grand Rapids Urban League (GRUL) released a report that showed one-third of Blacks owned homes while two-thirds were renters. It further stated that the condition of housing needed significant repair.<sup>i</sup> Another GRUL report from 1947 identified the shortage of housing in Grand Rapids at the time as an issue that had greater impact on the Black community. The report highlighted that Blacks paid the same as Whites for housing but were forced to live in undesirable and unattractive housing. The report stated overcrowding resulted from Blacks’ inability to select communities and housing of their choice and from restrictive covenants that prevented homeowners from selling homes to Blacks.<sup>ii</sup> According to a February 2018 article titled *“You Can’t Live Here: The Enduring Impacts of Restrictive Covenants”*, a restrictive covenant was a contract among property owners prohibiting sales of homes to blacks or other minorities for a specified period, usually twenty years. Restrictive covenants were so effective in preserving White home values that they became part of the government’s housing practices.<sup>iii</sup>

Besides redlining and restrictive covenants, many communities across the country were devastated by freeway construction. Father Dennis Morrow was interviewed by Jeff Smith in 1996 regarding the impact of highway construction in Grand Rapids. According to Father Morrow, “Roughly 4,000 people were displaced from highway construction through Grand Rapids.” He also stated that many of the neighborhoods declined after the freeway was built.<sup>iv</sup> Because federal funds were available to build highways, construction was also used as a way to address urban slum and blight. Neighborhoods considered slums were usually the neighborhoods that Black and ethnic minorities were restricted to because discrimination prevented them from moving to predominantly White neighborhoods.<sup>v</sup>

To reverse the impact of government supported discriminatory policies and practices, federal, state, and local laws were created to protect fair housing rights by prohibiting discrimination based on certain protected classes. Enforcement of these laws is available through administrative procedures offered by the U.S. Department of Housing and Urban Development (HUD), or by individual action through federal district or state circuit courts, or by the Attorney General of the United States. The laws most directly affecting fair housing as defined for purposes of this analysis are:

- U.S. Civil Rights Act of 1968, Title VIII (known as the Fair Housing Act)
- U.S. Fair Housing Amendments Act of 1988
- State of Michigan Elliott Larsen Civil Rights Act (PA 453)
- State of Michigan Persons with Disabilities Civil Rights Act (PA 220)
- City of Grand Rapids’ Fair Housing Ordinance

State and local governments can add additional protected classes, which Grand Rapids has done and will be discussed later in this report. Kent County has not passed a county-wide fair housing law. The following protected classes are covered under the Fair Housing Act:

Race	Religion
Color	Sex
National Origin	Familial Status
	Disability

The Consolidated Housing and Community Development Plan is a five-year plan that helps states and local jurisdictions assess their affordable housing and community development needs and market conditions, and make data-driven, place-based investment decisions. HUD is committed to eliminating racial and ethnic segregation, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing. The process to develop the Consolidated Plan includes a regulatory requirement to affirmatively further fair housing, often referred to as AFFH, as stated in Section 808 of the Fair Housing Act. At the time a grantee accepts funding from HUD, they must certify they will meet the following requirements which include:

- Conducting an analysis to identify impediments to fair housing choice within the jurisdiction.
- Taking appropriate actions to overcome the effects of any impediments identified through the analysis.
- Maintaining records reflecting the analysis and actions taken.

The affirmatively furthering fair housing obligation requires jurisdictions to take meaningful actions to overcome the legacy of segregation, unequal treatment, and historic lack of access to opportunity in housing. HUD interprets those broad objectives to mean:

- Analyzing and eliminating housing discrimination in the jurisdiction.
- Promoting fair housing choice for all persons.
- Providing opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability, and national origin.
- Promoting housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities.
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Education, employment, access to technology, good nutrition, community safety and health care are just some factors that can be impediments to fair housing. Addressing one factor while ignoring the others may yield meager results. Instead, multi-pronged approaches which work together to foster economic opportunity, improve educational attainment, improve workplace conditions, and increase access to quality nutrition, health care and housing makes impactful and sustainable changes at the community level.<sup>vi</sup>

Affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

Whether it is creating opportunities for families to move into high opportunity areas, or investing in revitalization efforts in neighborhoods, place matters. Amenities associated with strong



neighborhoods are important to long-term economic mobility of children and families. The Analysis of Impediments to Fair Housing Choice informs the Consolidated Plan and is an opportunity to change the trajectory of socio-economically disadvantaged groups by developing community and economic development priorities that direct the use and leverage entitlement funds for equitable investment to build strong neighborhoods.

Taking this into consideration, Community Planning Insights (CPI) and Hope Strategy Group (HSG) extended identification of impediments beyond the usual housing specific impediments to ensure the intent of the analysis is achieved: achieving equitable access to housing and high opportunity neighborhoods for protected classes, through place based and programmatic strategies. The study examines the most common amenities associated with strong neighborhoods to determine if barriers existed for certain groups or geographic areas in Grand Rapids and Kent County that might limit access to fair housing choice. We considered the proximity of the following attributes to determine access to opportunity and the quality of the neighborhood:

Homeownership	Access to Healthcare	Small/Micro-business
Crime	Social Cohesion	Development
Schools	Transportation	Bank Branches
Recreation	Income	Access to Technology
Infrastructure	Employment	

## Study Authors

CPI and HSG conducted the 2020 Analysis of Impediments to Fair Housing Choice. CPI is a planning firm in Dayton, Ohio that focuses on community and neighborhood planning, housing policy, community engagement, and comprehensive planning for communities of all sizes. HSG is a management consulting firm in Toledo, Ohio that specializes in assisting professionals, organizations, and communities in reaching their full potential through leadership development and coaching, operational performance management, and developing strategies for more equitable workplaces and distribution of investments in communities.

Aaron K. Sorrell, AICP principal and owner of Community Planning Insights, has over 20 years of experience in the planning and community development field, primarily focused on community and neighborhood development policy and implementation for medium and large cities. Aaron is a certified planner with the American Institute of Certified Planners (AICP) and a certified Economic Development Professional by the National Development Council. Aaron has managed numerous planning and community development projects including zoning and land use regulations, community development strategies, housing and neighborhood studies and effective community engagement and visioning.

Catherine Crosby, HSG managing partner and owner, has nearly 20 years of experience in civil rights enforcement in the areas of housing and employment, developing equitable community and economic development strategies that include public-private partnerships, working with communities to address intergroup tension, and implementing community relations and workplace programs and initiatives that foster diversity, equity, and inclusion within organizations and communities. She has worked with community and regional banks to develop community benefits agreements and assisted financial institutions with developing programs and products to meet the unique needs of communities in their markets.

## Community Engagement

A series of efforts were undertaken to engage community stakeholders in the development of this Impediments to Fair Housing Choice study. Due to the COVID-19 pandemic, non-traditional outreach and planning meetings were required instead of in-person discussions. During the process, an online fair housing survey was distributed through various means including direct email, posting on agency social media accounts, and paid advertising through Facebook. The online survey was available from September 30, 2020 through November 13, 2020 and available in English and Spanish.

In addition to the survey, nine focus groups were held from September 15, 2020 through September 18, 2020. The focus groups topics included equity and inclusion, affordable housing needs and priorities, economic development needs and priorities, and homeless and special needs housing priorities. There was a fair housing discussion in each focus group. Over 150 agencies were invited to take part in these focus groups, and 115 individuals representing 24 agencies participated.

The public was invited to attend a series of online public forums that took place October 7, 2020 through October 15, 2020. The online forums were held in the evening to accommodate as many residents as possible. There were four forums targeted to Kent County residents (two in English and two in Spanish), and there were six forums targeted to Grand Rapids' residents (three in English and three in Spanish).

The feedback received from the various focus groups, online survey responses and the public forums were used to shape the goals, objectives, and priorities outlined in this study.

## Fair Housing Survey Results

The fair housing survey was primarily designed to understand respondent's history and experience with housing discrimination, predatory lending, steering, and familiarity with fair housing laws or agencies in Grand Rapids and Kent County. Twenty-five percent (25%), 56 of 222 respondents, said that they had experienced housing discrimination or were unsure if they had experienced housing discrimination. Of the 56 respondents, 34 indicated they experienced some type of housing discrimination, and 22 indicated they might have experienced discrimination or were unsure. When factored for race, nearly 49% of the non-white respondents had experienced housing discrimination or were unsure.

The split between rental and for-sale discrimination was nearly identical. The most common forms of discrimination were race, followed by familial status, and source of income. Race accounted for nearly 45% of home-purchase discrimination responses. Respondents indicate instances of "steering" while looking for a home.

Nearly 44% (96 of 217) of respondents felt there is adequate housing in their community that meets their needs, however 38% (84 of 217) disagreed. When asked about their current housing or neighborhood satisfaction, almost 72% (156 of 217) were very satisfied or satisfied, 15% were neutral, and 13% were dissatisfied or very dissatisfied. Of the 13% that were dissatisfied or very dissatisfied, the leading reasons were: crime (61%), issues with neighbors (39%), cost of housing (36%), quality of the housing (32%), and other (32%).

When discussing predatory lending, 14% (30 of 218) responded they have been a victim or were unsure if they were a victim of predatory lending. Those who felt they had been a victim indicated that they were targeted based on race, source of income or sex. Less than one-third sought assistance with their loans, and of those, 37% were satisfied with the outcome.

When asked about their awareness or knowledge of fair housing laws or their rights under the Fair Housing Act, 72% (153 of 213) indicated they were aware and 28% indicated they were not. Forty nine percent indicated they know where to report housing discrimination, and 51% indicated they did not.

## Methodology Used

This document consists of three sections:

**Data analysis** - Demographic information and housing trends, and fair housing complaint and testing information provide a context for discussion. Data sources included, but are not limited to, the following:

Demographic information was obtained through the following:

- Local demographic reports
- U.S. Census
- City Health Dashboard
- County Health Ranking and Roadmaps
- Data USA
- Other Data Sources
- Living Wage Calculator
- National Community Reinvestment Coalition (NCRC) Fair Lending Report
- Federal Reserve Bank of Atlanta Opportunity Occupations Monitor
- 2019 United Health Foundation – American’s Health Rankings
- Spectrum Health Community Health Needs Assessment
- Comprehensive Housing Affordability Strategy (CHAS)
- City and County planning documents, policies, programs, and ordinances were examined to assess direct or indirect impact on housing choice.

Fair housing complaint data was obtained from the Fair Housing Center of West Michigan (FHCWM). A resident and stakeholder survey was conducted in English and Spanish and asked about their experiences with housing discrimination, knowledge of fair housing laws, and the overall fair housing environment within Grand Rapids and Kent County. Focus groups were held with community stakeholders including fair housing agencies, affordable housing advocates and developers, landlord associations, and neighborhood and civic leaders.

**Identification of barriers and impediments** - The second section identifies the barriers that may limit a household’s ability to take advantage of the full range of housing available in the city and county and includes existing strategies that seek to address each barrier.

**Fair Housing Plan** - This section identifies implementation strategies to eliminate or mitigate the negative impacts of specific barriers. Actions identified to address the impediments to fair housing will be included in the FY 2021-2025 Five-Year Consolidated Plan.

## Source of Funding for the Study

This study is jointly funded by the City of Grand Rapids and Kent County.

## Conclusions and Impediments Overview

The following impediments to fair housing choice were identified:

### **Impediment 1: Disparity in access to safe and affordable housing.**

Analysis of census data, focus group discussions, and survey results indicate a need to improve the quality of existing housing and expand access to safe and affordable housing throughout the county.

### **Impediment 2: Unequal access to opportunity.**

Unequal access to opportunities, including employment, housing and education exist in Grand Rapids and Kent County. Equitable efforts should be undertaken to bridge the gaps in access and opportunity such as workforce and small business development programs to combat high young adult unemployment rates and wage disparities between Black and White workers and support systems for women to enter and stay in the workforce. An enhanced focus on increasing minority homeownership and growing disadvantaged businesses will help bridge the wealth gap between White and non-White householders.

Both the City and County have a commitment to procurement diversity and developing small businesses as evidenced in review of their policies. While both show intentionality in procuring with diverse firms, in order to create equity in procurement, a disparity study is required. The *Richmond vs. J.A. Croson* case filed in the U.S. Supreme Court in 1989, ruled that governments must establish a “compelling interest” to support the creation of race and gender conscious small business programs. The study helps ensure any race- or gender-based remedial programs will withstand scrutiny in a court of law. The primary goal of the study is to assess, quantify, and evaluate the prevalence, significance (degree and weight) and scope of discrimination in the marketplace. The study ensures that a race and gender conscious program is legally defensible and narrowly tailored to address passive discrimination in the public and private market.<sup>lxi</sup>

### **Impediment 3: Segregated living patterns.**

Historic red-lining and block busting practices, along with housing and transportation policies, have created segregated living patterns in Kent County and Grand Rapids. Efforts should be strengthened to ensure countywide distribution of affordable housing, improve access to transportation, increase homeownership in minority communities, and improve the utilization and acceptance of the Housing Choice Voucher program

### **Impediment 4: Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs).**

Efforts should be undertaken to provide meaningful transformation in R/ECAP neighborhoods to increase household income of existing residents through better access to jobs, transportation and/or education. Scaling minority-owned businesses in racially and ethnically concentrated neighborhoods can also play a role in transforming hyper-segregated communities.

### **Impediment 5: Civil rights and fair housing violations.**

Kent County and Grand Rapids should take steps to strengthen and improve their civil rights and fair housing protections through changes in local ordinances, strengthening the role of departments responsible for enforcement, enhanced outreach and education, and targeted fair housing testing.

## Section 2: jurisdictional background data

The City of Grand Rapids is a medium-sized Midwest city in west central Michigan and is the second largest city in the state of Michigan. It encompasses an area of approximately 45 square miles. The Grand River, a major state waterway, runs through the city's center. The city's population is 202,217 according to 2019 census estimates. Grand Rapids is the county seat of Kent County. The county has a population count of 653,762 according to 2019 Census estimates, covering 856 square miles. The metropolitan area (MSA) has a population of over 1,000,000, which represents 10% of the state's population of 10,003,654. The MSA includes Kent, Ionia, Montcalm, and Ottawa Counties.

In addition to service fees, grants, and state and federal support, the City relies on income and property taxes to support operations and capital investments. In 1967, the City's electorate approved a two-mill reduction in the City's maximum authorized general operating property tax millage to be replaced by an income tax imposed on income earned within the city regardless of the taxpayer's location. Income tax includes business net income and employee salaries and wages. Currently, the City's income tax rate is 1.5% for taxpayers located or residing in the city and 0.75% for taxpayers earning income within the city but located or residing outside the city. Property taxes are levied on a property's Taxable Value for which annual increases are limited to the inflation rate until the property is sold, improved, or transferred to a new owner.<sup>vii</sup> Impediments to fair housing impact the City's ability to increase revenue because these barriers impact the quality and value of properties as well as a resident's access to higher incomes depending on their proximity to high-wage jobs. Both housing and employment influence the amount of tax revenue collected and available to provide quality city services.

According to the 2018 Equitable Growth in Grand Rapids' report completed by Alyssa Davis with the Bloomberg-Harvard City Leadership Initiative, Grand Rapids wanted to understand and work to close the opportunity gap for people of color in the city, specifically in Neighborhoods of Focus (NOF). NOFs are 17 census tracts in the near west and south side of Grand Rapids in relation to downtown. The report states that on the macro-level, Grand Rapids continues to see strong economic growth across the majority of the city. However, a closer look at the data shows that communities in the near-south and near-west side – home to 32% of Grand Rapids' population – are excluded from this economic growth, as evidenced by lower rates of educational attainment and higher rates of unemployment and poverty.

Grand Rapids has made race and equity a priority and joined the Government Alliance on Race & Equity (GARE) in 2016, which resulted in a Racial Equity Plan focused on six major areas:

1. City infrastructure: City services are equitably delivered.
2. Budget: City budget process is completed using a racial equity lens.
3. Inclusive engagement: City is viewed as an effective and inclusive government that engages the community.
4. Racial equity in workforce, business development, and supplier diversity: City's communities of color equitably benefit from the economic, hiring, and procurement activities of the city.
5. Neighborhoods: City's communities of color equitably benefit in the economic prosperity of the city.
6. Youth engagement: The City supports and engages in youth-centric programs that provide meaningful and sustainable opportunities for students and young adults.

The City of Grand Rapids has a history of targeting its federal funds to low-and moderate-income neighborhoods, identified as the Community Development General Target Area and Specific Target Areas. These areas are centrally located in the city and encompass many of the neighborhoods with high concentrations of poverty and minority households. The city's most recent budget document indicates that the city continues to work to address equity by using a framework to access and measure the impact of its investments.

Kent County is also a member of GARE. The County is committed to providing resources and services that promote a high quality of life for the entire community through the budget and planning process.

The County's primary sources of revenue are income and property taxes representing 55.5% of the County's total General Fund operating revenue. There is an anticipated reduction in property taxes due to the pandemic. However, the recent passage of the American Rescue Plan will replace the lost revenue. Other revenue sources include the following:

- 11.4% Intergovernmental
- 15.4% Charges for Services
- 2.3% Investment, Rent, and Royalties
- 3.7% Other Revenue

The County has five priorities, which are listed below. The priorities include a goal to address social determinants of health and equitable access to services.

1. Economic Prosperity
2. High Quality of Life
3. Excellence in Service Delivery
4. Inclusive Participation
5. Effective Communication

The County incorporated equity into its framework for diversity and inclusion with a focus on fair treatment, access, opportunity, and advancement for all employees and community stakeholders, while at the same time striving to identify and eliminate barriers that have prevented the full participation of some groups, particularly historically under-represented or underserved groups.

The County identified the following Diversity, Equity, and Inclusion (DEI) priorities:

- Leadership - Address enhancing DEI efforts by encouraging top leadership to model the way and demonstrate a commitment to DEI, engaging the Board of Commissioners and improving hiring practices to ensure a more diverse pool of talent.
- Organizational Culture - Continue working toward developing an inclusively excellent organizational culture through employee training, assessment, and improved communications.
- Accountability - Develop and implement strategies to monitor efforts and progress.

## Demographic Data

The Fair Housing Act prohibits discrimination in the sale or rental of housing including against individuals seeking a mortgage or housing assistance, or in other housing related activities. To appropriately identify strategies to address contributing factors that impact fair housing issues that limit a person’s ability to access safe and stable communities, there must be an examination of demographic data to determine how protected classes are impacted by historical and systemic discrimination in housing. The following protected classes are covered under the Fair Housing Act:

Race	Sex
Color	Familial Status
National Origin	Disability
Religion	

Local jurisdictions can add additional protected classes, which will be addressed later in the study.

Demographic data was analyzed for both Grand Rapids and Kent County. Kent County data includes Grand Rapids. Table 1 below provides population projections for both Grand Rapids and Kent County. The data indicates the city and county will experience approximately 4% growth over the next five years.

Table 1: Population Projections

Year	Grand Rapids		Kent County	
	Population	% Change	Population	% Change
2000	197,327		574,335	
2010	187,941	-4.8%	602,622	4.9%
2020 Estimate	202,436	7.7%	654,282	8.6%
2025 Projection	209,686	3.6%	680,613	4.0%

Source: ESRI Business Analyst

## Population

Table 2 provides population data by race and ethnicity. According to 2014-2018 ACS Five-Year Estimates, foreign born persons represented 10.5% of the Grand Rapids’ population and 8.3% of Kent County. Of the population over 18 in Grand Rapids, 6.8% speak a language other than English, of which 31.3% speak less than very well. In Kent County, 7.3% speak a language other than English, of which 28.8% speak less than very well. Figure 1 shows the concentration of Black households within the county and Figure 2 shows the concentration of Hispanic households.

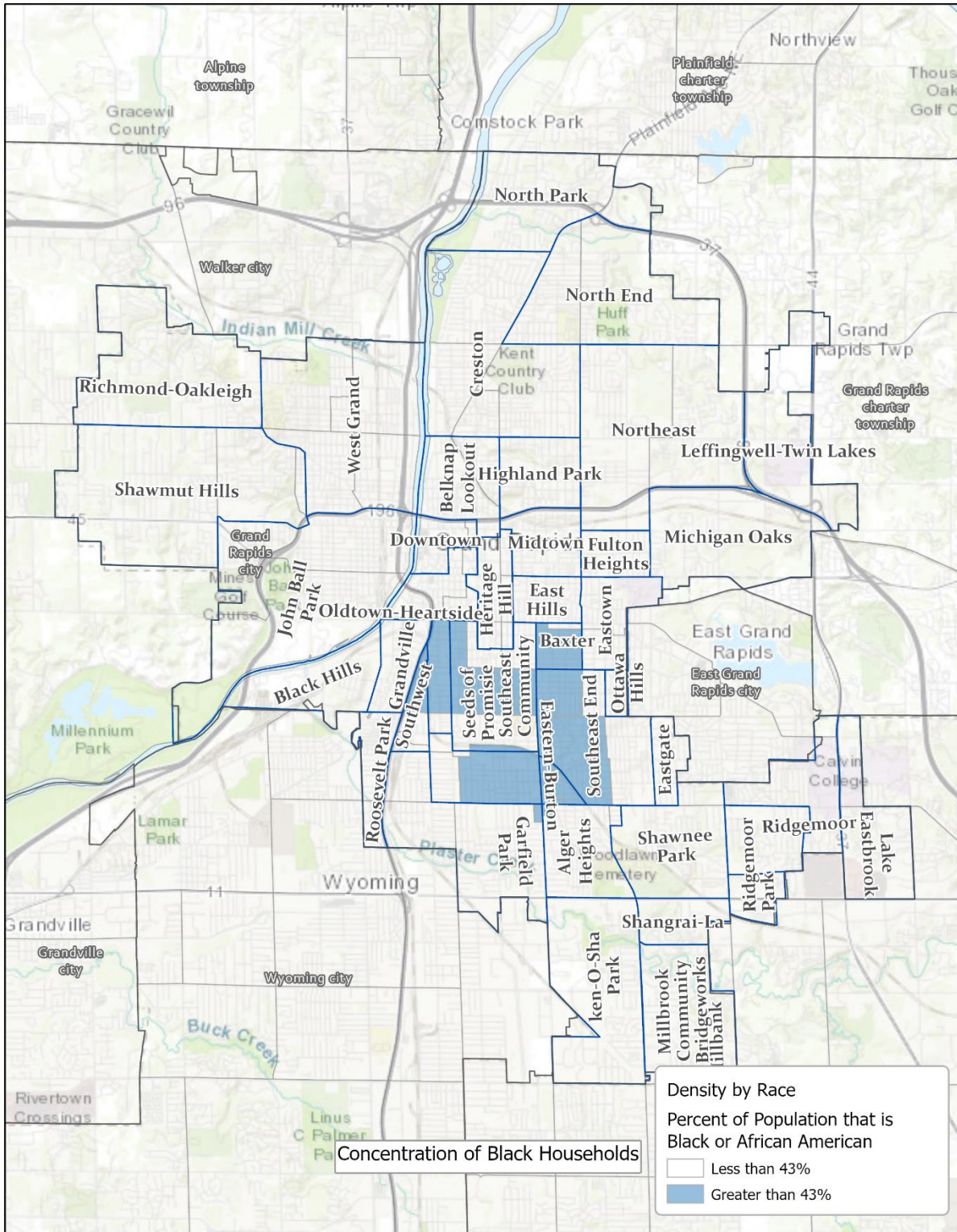
Table 2: 2020 Estimated Population by Race and Ethnicity

Race/Ethnicity	Grand Rapids		Kent County	
	Number of People	% of Population	Number of People	% of Population
White	123,936	61.22%	504,508	77.11%
Black	43,475	21.48%	65,495	10.01%
American Indian/Alaska Native	1,551	0.77%	3,371	0.52%
Asian	5,589	2.76%	23,325	3.56%
Pacific Islander	138	0.07%	300	0.05%
Other Race	17,683	8.74%	33,454	5.11%
Population of Two or More Races	10,065	4.97%	23,829	3.64%
Hispanic Population	35,546	17.56%	72,715	11.11%

Source: ESRI Business Analyst



Figure 1: Concentration of Black Households



Source: 2013-2017 CHAS



### Age

Table 3 shows median age for Grand Rapids and Kent County. The median age for Grand Rapids was 31 and 34.6 for Kent County according to the previous study covering the 2016-2021 period.

Table 3: Median Age

Median Age	Grand Rapids	Kent County
All Residents	32.9	36.2
Female	33.7	37.3
Male	32.1	36.2

Source: 2019 ACS 1-Year Estimates

Table 4: Age provides an overview of the percentage of the population that are children and seniors who are 65 and older.

Table 4: Age

Age	Grand Rapids	Kent County
Under 5	7.3%	6.6%
Under 18	23.9%	23.9%
65 and older	13.3%	14.4%

Source: 2019 ACS 1-Year Estimates

### Gender

Table 5 shows slightly more females than males in Grand Rapids and Kent County.

Table 5: Gender

Gender	Grand Rapids	Kent County
Female	51.0%	50.9%
Female Under 18	23.0%	23.1%
Male	48.9%	49.1%
Male Under 18	24.8%	24.8%

Source: 2019 ACS 1-Year Estimates

## Households

Table 6 shows the total households in Grand Rapids and Kent County by race and ethnicity.

Table 6: Households by Race/Ethnicity

Race	Grand Rapids		Kent County	
	Count	Percentage	Count	Percentage
White	50,065	68.16%	190,115	80.24%
Black	13,375	18.21%	21,355	9.01%
American Indian or Alaska Native	245	0.33%	639	0.27%
Asian	1,268	1.73%	5,339	2.25%
Pacific Islander	4	0.01%	49	0.02%
Other	1,280	1.74%	3,630	1.53%
Hispanic	7,220	9.83%	15,800	6.67%
<b>Grand Total</b>	<b>73,457</b>	<b>100.00%</b>	<b>236,927</b>	<b>100.00%</b>

Source: 2013-2017 CHAS

According to the Census glossary, a householder is the person, or one of the people, in whose name the home is owned, being bought, or rented. A family householder is a householder living with one or more people related to him or her by birth, marriage, or adoption. The householder and all people in the household related to him are family members.<sup>viii</sup>

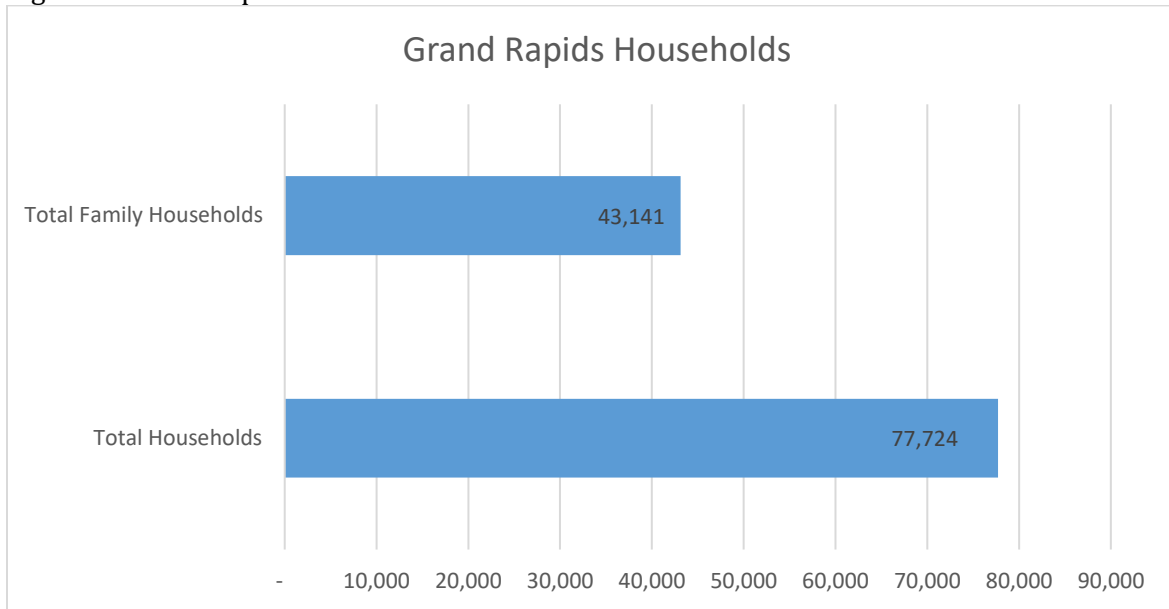
There are two types of households, family (more than one related person) and non-family (singles, cohabitators). Total households include family and non-family. Table 7 provides an overview of households in Grand Rapids and Kent County.

Table 7: 2019 Households in Grand Rapids and Kent County

Type of Household	Grand Rapids	Kent County
Total Households	77,724	246,115
Total Family Households	43,141	162,036
% Family Households	55.51%	65.84%
Average Household Size	2.5	2.61
Average Family Size	3.23	3.18
Female Householder	32.90%	26.10%
Female w/ own children under 18	7%	5.50%
Male Householder	23.40%	17.30%
Male w/ own children under 18	1.30%	1.20%
2010-2019 Households Annual Growth Rate	0.82%	0.87%
2019-2024 Households Annual Growth Rate	0.89%	0.88%
2010-2019 Families Annual Growth Rate	0.55%	0.68%
2019-2024 Families Annual Growth Rate	0.70%	0.76%

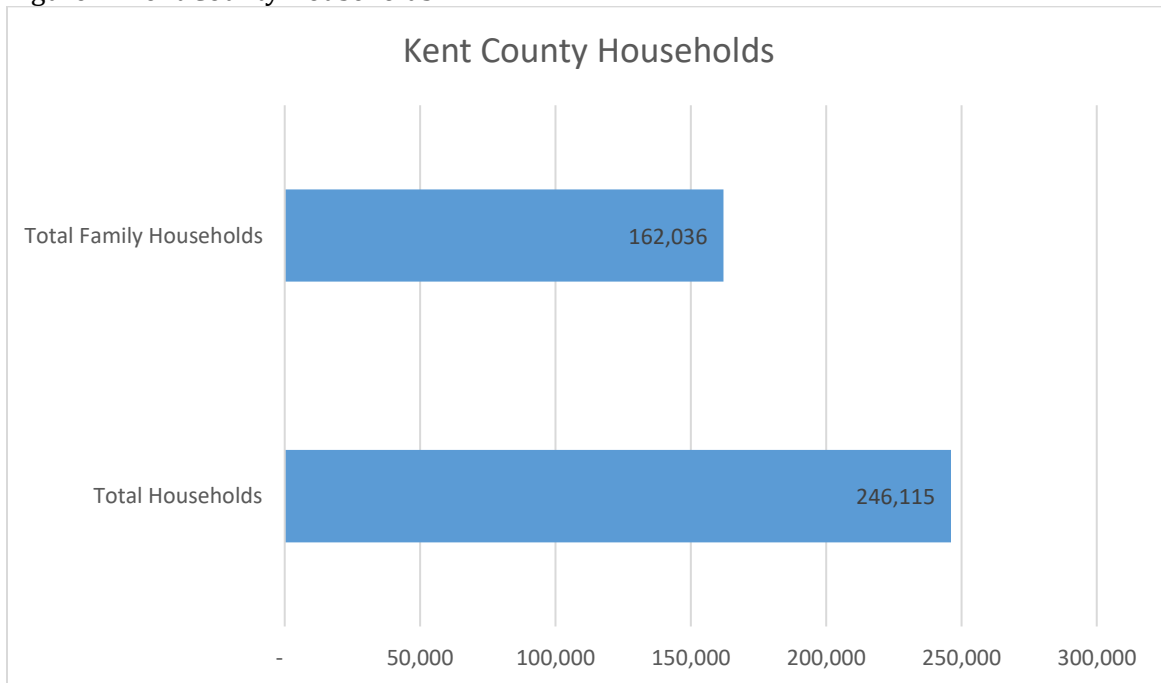
Source: ESRI Demographics

Figure 3: Grand Rapids Households



Source: ESRI 2019 Estimate

Figure 4: Kent County Households



Source: ESRI 2019 Estimate

### Disability

The Census defines disability as a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. The condition can also impede a person from being able to go

outside the home alone or work at a job or business. The ACS attempts to capture six aspects of disability (hearing, vision, cognitive, ambulatory, self-care, and independent living), which can be used together to create an overall disability measure, or independently to identify populations with specific disability types. In the American Housing Survey (AHS), a person with a **hearing** disability is deaf or has a hearing impairment that makes it very difficult to hear conversation, television, or radio broadcasts. A person with a **vision** disability is blind or has serious difficulty reading or driving due to a visual impairment even when wearing glasses. A **cognitive** disability results from a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions. An **ambulatory** disability is having serious difficulty walking or climbing. A person with a **self-care** disability has serious difficulty dressing or bathing oneself. An **independent living difficulty** results from a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping. Table 8 shows the total population with disabilities in each of the categories.<sup>ix</sup>

According to 2019 ACS 1-Year Estimates, 12.8% of the total population in Grand Rapids has a disability compared to 10.6% in Kent County. As noted in Table 7, ambulatory and independent living difficulty are the leading disabilities in Grand Rapids and Kent County, followed by cognitive. Grand Rapids has a higher percentage of individuals with disabilities in all categories except hearing.

Table 8: Disability Type

Disability Type	Grand Rapids	Kent County
Hearing	2.6%	3.0%
Vision	2.5%	1.9%
Cognitive	5.9%	5.4%
Ambulatory	7.1%	5.7%
Self-care Difficulty	2.7%	2.3%
Independent Living Difficulty	7.3%	5.7%
Overall	12.8%	10.6%

Source: 2019 ACS 1-Year Estimates

### Education

Table 9 provides educational attainment for Grand Rapids and Kent County. Overall, the county has higher educational attainment compared to the city, but Grand Rapids has a slightly higher percentage of graduate degrees. Table 10 provides a more detailed breakdown of educational attainment.

Table 9: Educational Attainment – High School and Bachelor’s Degree

Education Level	Grand Rapids	Kent County
HS and above	87.39%	90.95%
BS and above	36.76%	36.66%

Source: ESRI 2019 Estimate

Table 10: Educational Attainment

Education Level	Grand Rapids	Kent County
High School Diploma	17.74%	20.62%
GED/Alternative Credential	3.92%	3.14%
Some College/No Degree	21.02%	21.23%
Associate's Degree	7.95%	9.30%
Bachelor's Degree	23.50%	23.82%
Graduate/Professional Degree	13.17%	12.84%

Source: ESRI 2019 Estimate

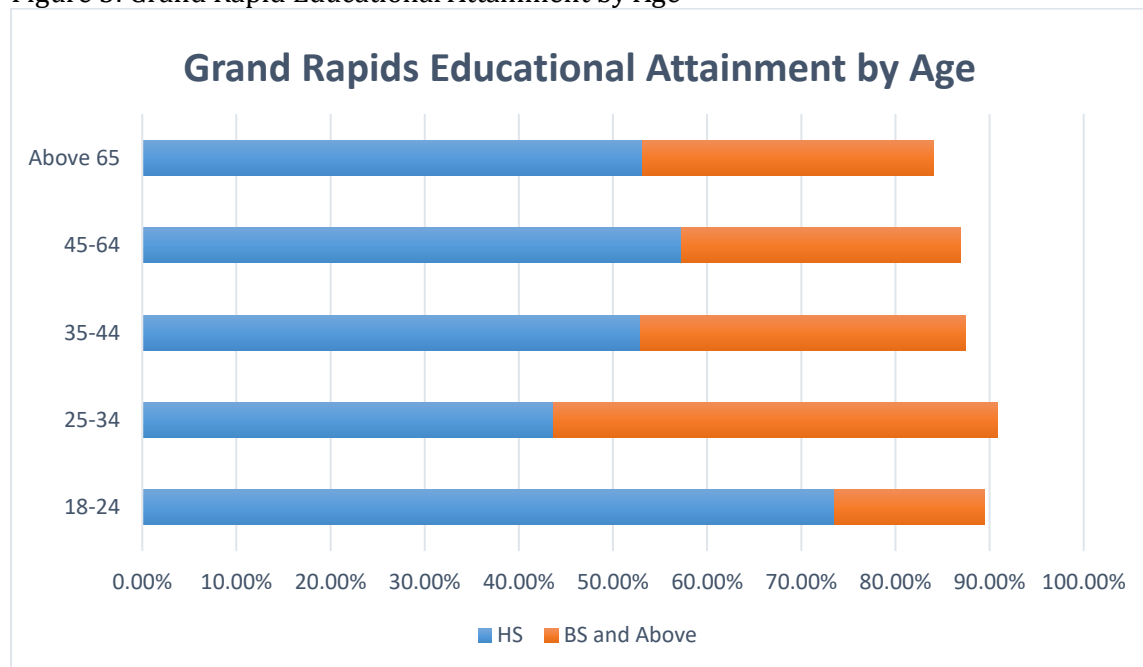
Table 11 shows educational attainment by age and gender across various age categories for Grand Rapids and Table 12 for Kent County.

Table 11: Grand Rapids Educational Attainment by Age

Education Level	Age				
	18-24	25-34	35-44	45-64	Above 65
HS and Above	89.5%	90.8%	87.4%	86.9%	84.0%
BS and Above	16.0%	47.1%	34.5%	29.6%	30.9%

Source:2019 ACS 1-Year Estimate

Figure 5: Grand Rapid Educational Attainment by Age



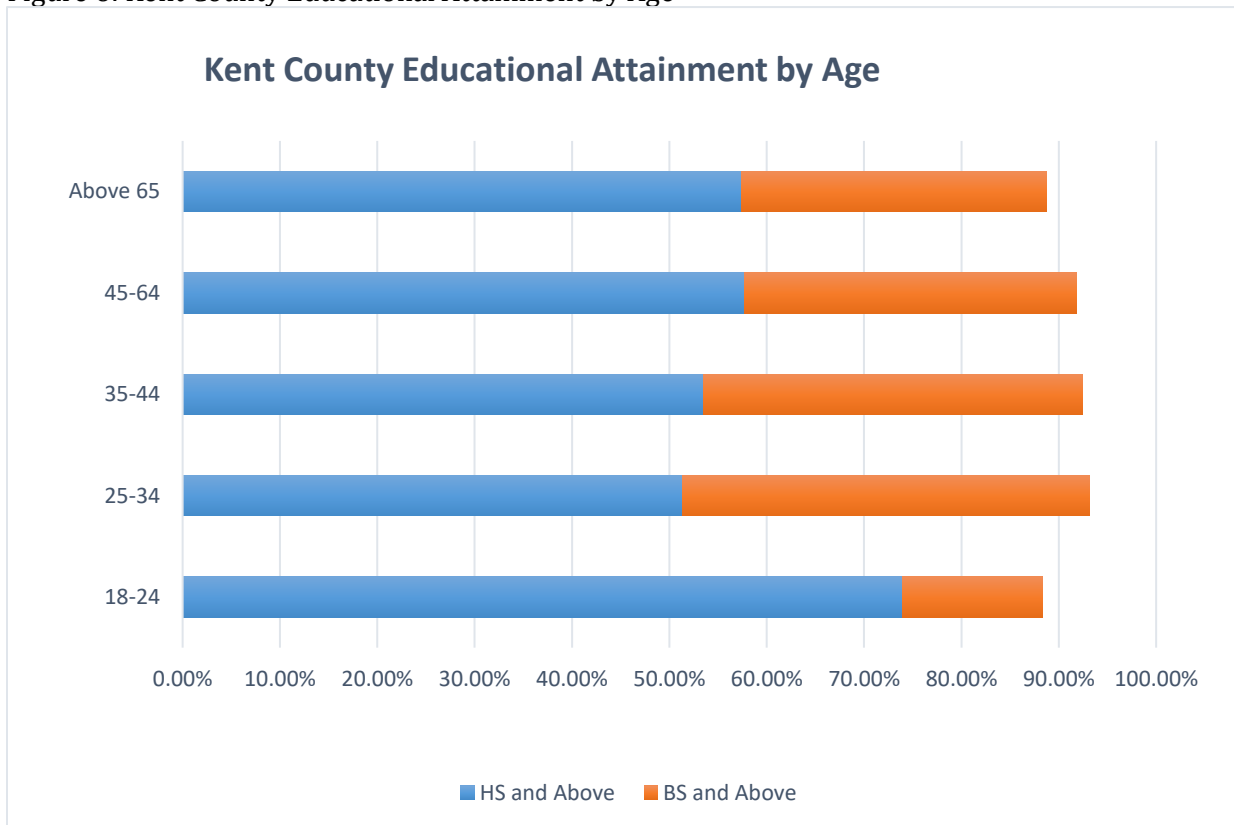
Source:2019 ACS 1-Year Estimate

Table 12: Kent County Educational Attainment by Age

Education Level	Age				
	18-24	25-34	35-44	45-64	Above 65
HS and Above	88.30%	93.20%	92.40%	91.80%	88.70%
BS and Above	14.40%	41.90%	38.90%	34.10%	31.30%

Source:2019 ACS 1-Year Estimate

Figure 6: Kent County Educational Attainment by Age



Source:2019 ACS 1-Year Estimate

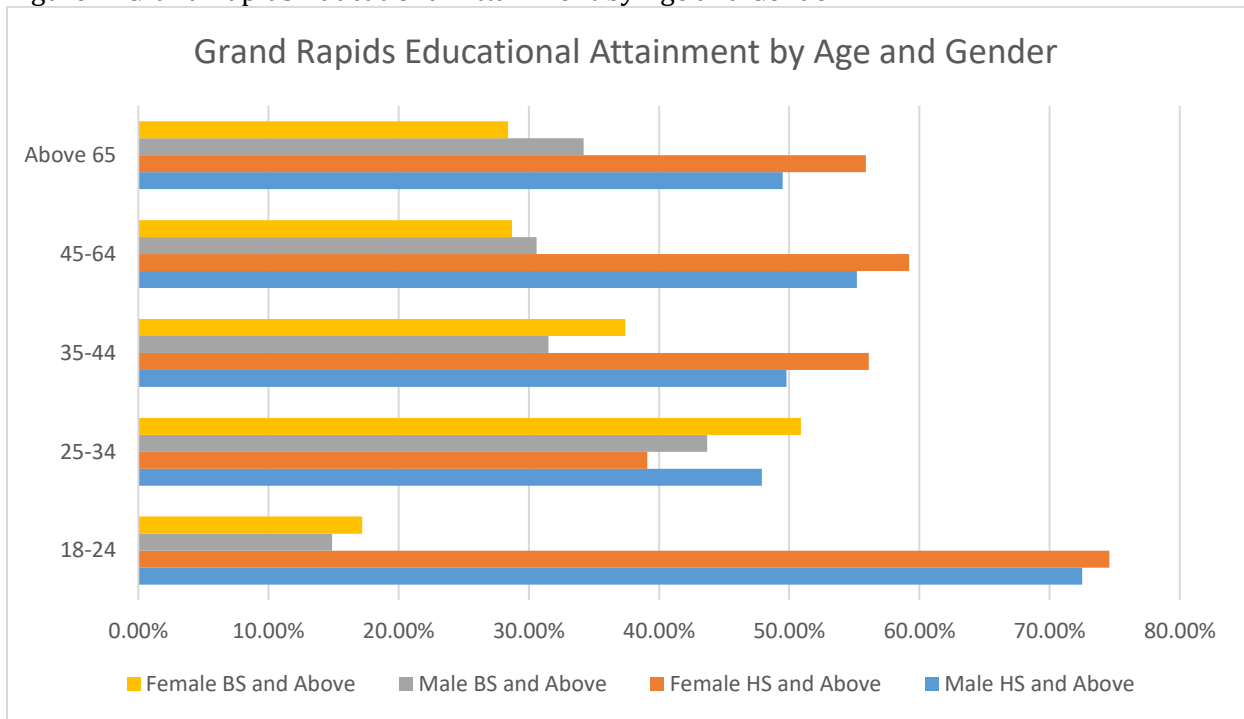


In Grand Rapids, women have higher educational attainment than men except for 65 and older.

Table 13: Grand Rapids Educational Attainment by Age and Gender

Education Level	Age				
	18-24	25-34	35-44	45-64	Above 65
Male HS and Above	87.40%	91.60%	81.30%	85.80%	83.70%
Male BS and Above	14.90%	43.70%	31.50%	30.60%	34.20%
Female HS and Above	91.80%	90.00%	93.50%	87.90%	84.30%
Female BS and Above	17.20%	50.90%	37.40%	28.70%	28.40%

Figure 7: Grand Rapids Educational Attainment by Age and Gender



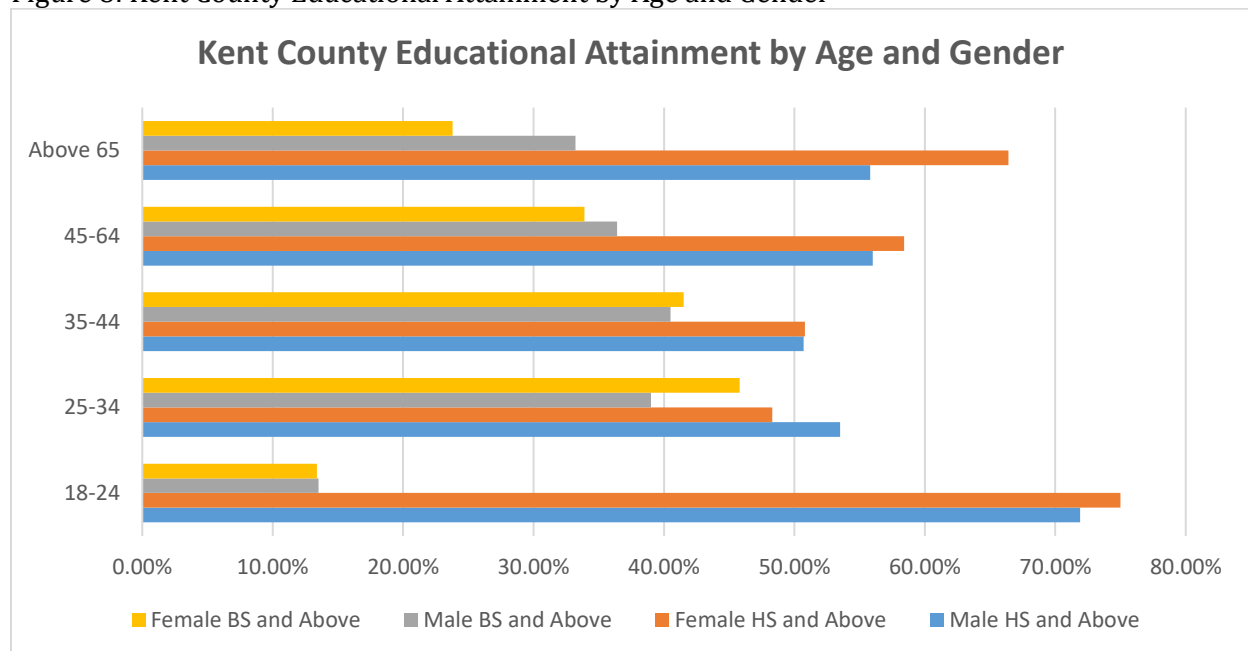
Source: 2019 ACS 1-Year Estimate

In Kent County, women have higher educational attainment between 25-44. Men have higher educational attainment ages 45 and older.

Table 14: Kent County Educational Attainment by Age and Gender

Education Level	Age				
	18-24	25-34	35-44	45-64	Above 65
Male HS and Above	84.60%	93.30%	89.30%	91.40%	89.30%
Male BS and Above	12.30%	38.40%	35.70%	34.60%	37.70%
Female HS and Above	92.00%	93.20%	95.50%	92.30%	88.30%
Female BS and Above	16.50%	45.40%	42.00%	33.50%	16.10%

Figure 8: Kent County Educational Attainment by Age and Gender



Source: 2019 ACS 1-Year Estimate

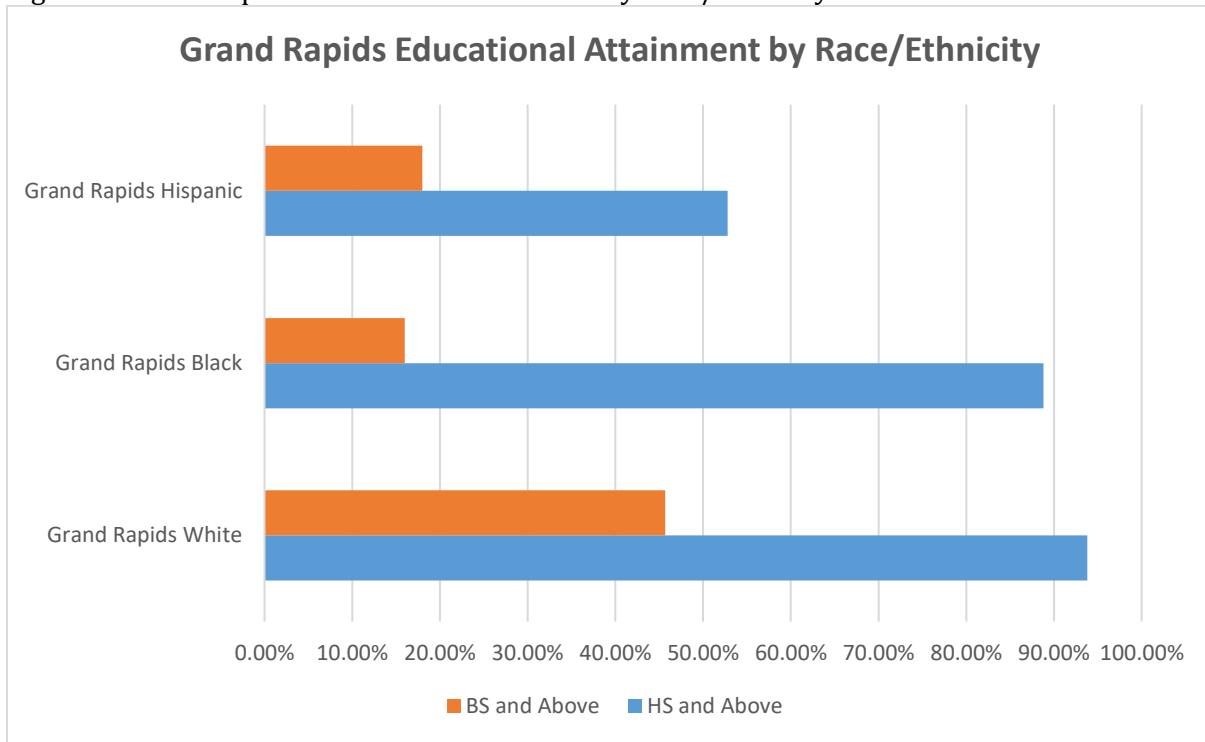
Table 15 shows educational attainment by race and ethnicity for Grand Rapids and Table 16 for Kent County. Hispanic persons have significantly less educational attainment than any other demographic group in Grand Rapids and Kent County.

Table 15: Grand Rapids Educational Attainment by Race/Ethnicity

Race/Ethnicity	HS and Above	BS and Above
White	93.8%	45.7%
Black	88.8%	16.0%
Hispanic	52.8%	18.0%

Source: 2019 ACS 1-Year Estimate

Figure 9: Grand Rapids Educational Attainment by Race/Ethnicity



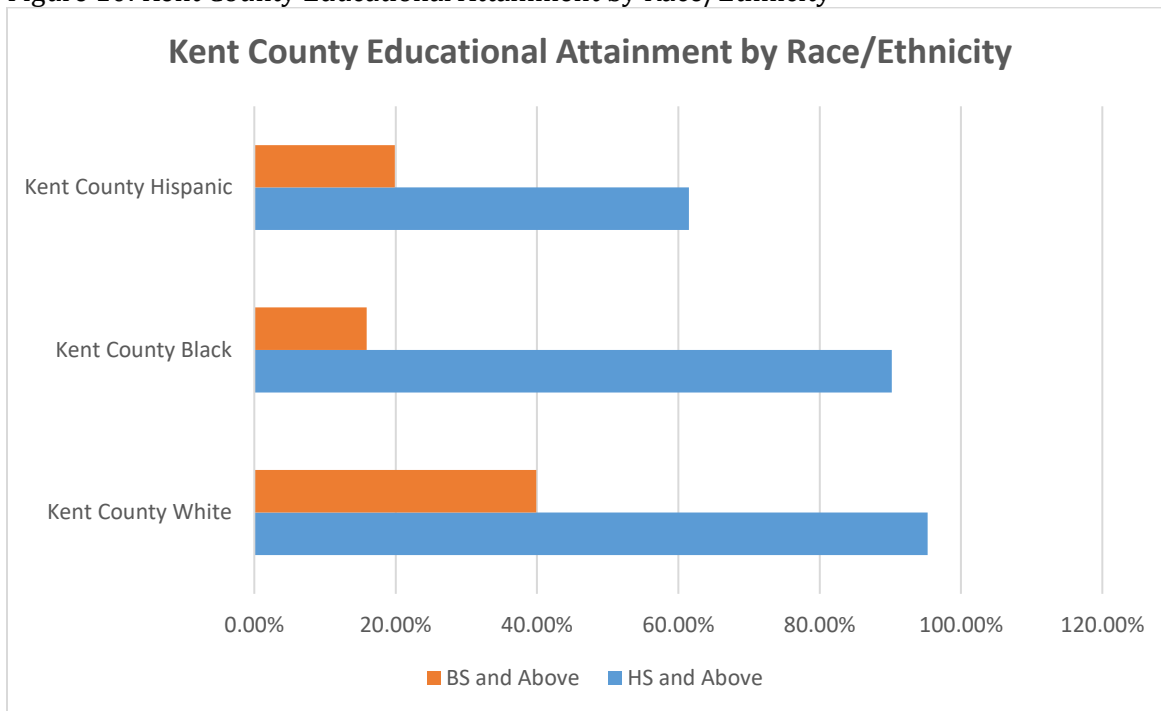
Source: 2019 ACS 1-Year Estimate

Table 16: Kent County Educational Attainment by Race/Ethnicity

Race/Ethnicity	HS and Above	BS and Above
White	95.30%	39.90%
Black	90.20%	15.90%
Hispanic	61.50%	19.90%

Source: 2019 ACS 1-Year Estimate

Figure 10: Kent County Educational Attainment by Race/Ethnicity



Source: 2019 ACS 1-Year Estimate

## Income

Income is the gauge used to determine the well-being of the population. It also provides an indication of how well Grand Rapids and Kent County can meet the needs of its residents. Income is the sum of the amounts reported separately for wage or salary income; net self-employment income; interest, dividends, or net rental or royalty income or income from estates and trusts; Social Security or Railroad Retirement income; Supplemental Security Income (SSI); public assistance or welfare payments; retirement, survivor, or disability pensions; and all other income. Therefore, income does not reflect the fact that some families receive part of their income in the form of noncash benefits, such as food stamps, health benefits, subsidized housing, and goods produced and consumed on the farm.<sup>1</sup>

Median household income refers to the income level earned by a given household where half of the households in the geographic area of interest earn more and half earn less. Table 17 shows income growth by race between 2014 and 2019. Even after accounting for 8% inflation, Grand Rapids' residents have seen a growth in their incomes. The data show a significant disparity between Blacks and Hispanics compared to Whites, with Blacks experiencing the most significant disparity. The disparity between Black and Hispanic median income does not correlate with educational attainment data. Higher education would indicate the likelihood of a higher median income. However, median income for Hispanics is higher than the median income for Blacks, even though Hispanics have lower educational attainment. The data also show that higher income individuals reside outside of the city.

<sup>1</sup> [https://www.census.gov/glossary/#term\\_Income](https://www.census.gov/glossary/#term_Income)

Table 17: Median Income by Race/Ethnicity

Race/Ethnicity	2014	2019	% Annual Change
Grand Rapids All	\$39,056	\$51,817	7%
Grand Rapids White	\$47,197	\$63,256	7%
Grand Rapids Black	\$21,962	\$34,343	11%
Grand Rapids Hispanic	\$32,327	\$43,442	7%
Kent County All	\$53,304	\$66,532	5%
Kent County White	\$59,117	\$71,873	4%
Kent County Black	\$25,833	\$36,030	8%
Kent County Hispanic	\$35,220	\$52,028	10%

Source: ESRI 2019 Estimate

Table 18 shows 2019 household income for Grand Rapids and Kent County.

Table 18: 2019 Household Income

Household Income	Grand Rapids	Kent County
	% of Households	% of Households
Less than \$15,000	11.72%	7.06%
\$15,000 - \$24,999	12.24%	9.05%
\$25,000 - \$34,999	10.37%	8.82%
\$35,000 - \$49,999	16.49%	14.16%
\$50,000 - \$74,999	19.34%	19.57%
\$75,000 - \$99,999	12.55%	14.15%
\$100,000 - \$149,999	11.31%	15.83%
\$150,000 - \$199,999	3.55%	6.06%
\$200,000 or Greater	2.42%	5.30%

Source: ESRI 2019 Estimate

Public assistance refers to assistance programs that provide either cash assistance or in-kind benefits to individuals and families from any government entity. There are two major types of public assistance programs: social welfare programs and social insurance programs. Benefits received from social welfare programs are usually based on low income means test eligibility criteria. Programs include Supplemental Security Income (SSI), Supplemental Nutrition Assistance Program (SNAP), Special Supplemental Nutrition Program for Women Infants and Children (WIC), Temporary Assistance for Needy Families (TANF) including Pass through Child Support, and General Assistance (GA). Benefits received from social insurance programs are usually based on eligibility criteria such as age, employment status, or being a veteran. Programs include social security, Department of Veterans' Affairs benefits, unemployment insurance compensation, and worker's compensation. Retirement income is based on the employee and/or the employer's

contributions to the employee’s individual account that are invested on the employee’s behalf and depend on investment performance. Table 19 shows the various types of income received by residents of Grand Rapids and Kent County.

Table 19: Income Assistance by Type

Type of Income	Grand Rapids	Kent County
Public Assistance	3.84%	2.55%
Food Stamps/SNAP	18.89%	11.46%
Retirement	14.53%	16.23%
Social Security	25.90%	27.79%

Source: ESRI 2019 Estimate

Income inequality in a community can accentuate differences in social class and status and serve as a social stressor. Communities with greater income inequality can experience a loss of social connectedness, as well as decreases in trust, social support, and a sense of community for all residents.<sup>x</sup> Income inequality is defined as households with income at the extremes of the national income distribution (the bottom 20%, the top 80%). A higher inequality ratio indicates greater division between the top and bottom ends of the income spectrum. A score of 0 would indicate equity in income distribution. A score less than 0 indicates that more families are represented at the lower end of the income spectrum, while a score above 0 indicates more families are represented in the higher end of the spectrum. According to the national City Health Dashboard, which provides data for over 750 U.S. cities with populations over 50,000, Grand Rapids has an income inequality score of -16.8.<sup>xi</sup> According to the national Health Rankings and Roadmaps, Kent County has an income inequality score of 4.2.<sup>xii</sup> Less income could indicate less access to high opportunity neighborhoods with better quality housing.

### Poverty

If the income of a family or an individual is below the official poverty threshold, then that family or individual is in poverty. The poverty threshold follows the Office of Management and Budget (OMB) set of income thresholds that vary by family size and composition to determine who is in poverty.<sup>xiii</sup> Table 20 shows the 2019 poverty threshold by size of family and number of children.

Table 20: 2019 Poverty Thresholds

Size of family unit	Related children under 18 years								
	None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One person (unrelated individual):									
Underage 65	13,300								
Aged 65 and older	12,261								
Two people:									
Householder underage 65	17,120	17,622							
Householder aged 65 and older	15,453	17,555							
Three people	19,998	20,578	20,598						
Four people	26,370	26,801	25,926	26,017					
Five people	31,800	32,263	31,275	30,510	30,044				
Six people	36,576	36,721	35,965	35,239	34,161	33,522			
Seven people	42,085	42,348	41,442	40,811	39,635	38,262	36,757		
Eight people	47,069	47,485	46,630	45,881	44,818	43,470	42,066	41,709	
Nine people or more	56,621	56,895	56,139	55,503	54,460	53,025	51,727	51,406	49,426

Source: U.S. Census Bureau.

The ratio of income to poverty has seven categories, which range from under 0.50 to 2.00 and over. A ratio less than 1 means that the income is less than the poverty level. When the ratio equals 1, the income and poverty level are the same, and when the ratio is greater than 1, the income is higher than the poverty level. The income and poverty levels are used to determine eligibility for various programs.<sup>xiv</sup> Table 21 shows that approximately 21% of Grand Rapids and approximately 12% Kent County have income less than the poverty level.

Table 21: Ratio of Income to Poverty

Ratio of Income to Poverty	Grand Rapids	Kent County
<0.50	9.58%	5.48%
0.50 - 0.99	11.66%	7.08%
1.00 - 1.24	7.45%	4.42%
< 1.25 - 1.49	5.63%	4.64%
1.50 - 1.84	8.10%	6.60%
1.85 - 1.99	2.97%	2.90%
2.00+	54.60%	68.89%

Source: ESRI 2019 Estimate

Table 22 provides an overview of the population in Grand Rapids and Kent County living below poverty. The data shows that women, children, Blacks and Hispanics are disproportionately represented in the population living below poverty compared to their overall population representation.

The disparity between Blacks and Whites and Hispanics and Whites is significant and impacts an individual's and family's access to housing choice in high opportunity areas within the city and county. The disparity between males and females also impacts children, given that there is a higher percentage of households headed by single mothers with children under the age of 18 compared to households headed by single fathers.

Table 22: Grand Rapids and Kent County Population Below Poverty

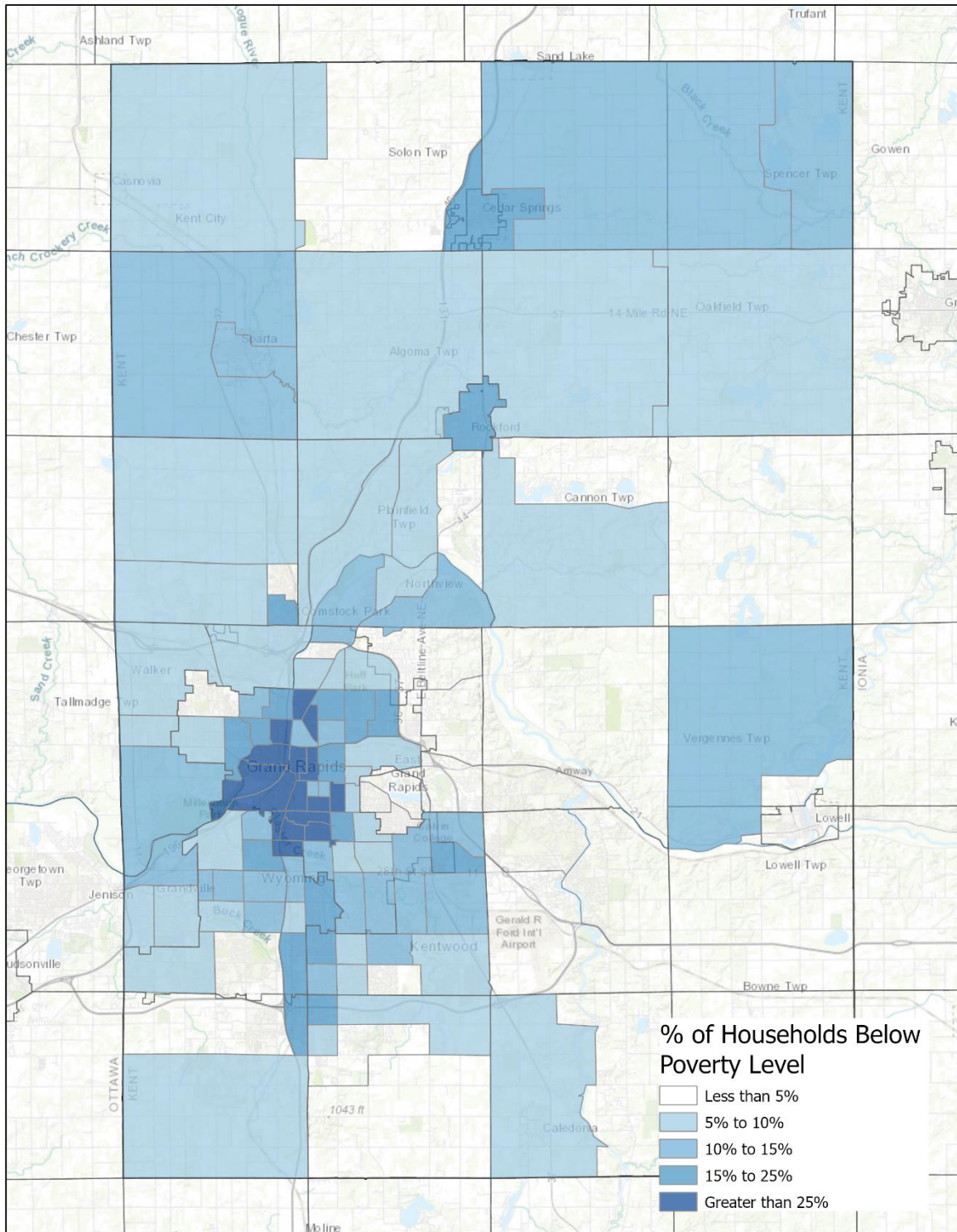
Population Demographics	Grand Rapids		Kent County	
	Percent of Population	Percent in Poverty	Percent of Population	Percent in Poverty
<b>Total Population Below Poverty</b>	21.20%		12.60%	
<b>Total Households Below Poverty</b>	18.70%		11.33%	
<b>Children in Poverty</b>				
Under 18 years	23.10%	29.70%	24.70%	16.60%
5-17 years	16.00%	28.50%	17.80%	15.90%
Under 5 years	7.10%	32.30%	6.90%	18.50%
<b>Poverty by Gender</b>				
Females Below Poverty	50.70%	22.30%	50.80%	13.50%
Males Below Poverty	49.30%	20.10%	49.20%	11.60%
<b>Poverty by Race/Ethnicity</b>				
Whites Below Poverty	59.40%	14.40%	74.00%	8.60%
Blacks Below Poverty	19.20%	29.60%	9.70%	26.30%
Hispanics Below Poverty	15.90%	35.60%	10.40%	26.30%

Source: 2018 ACS Five Year Estimates

Figure 11 shows the percentage of households living below the poverty level by census tract. Consistent with census data, the figure shows higher rates of poverty in the city and concentrated within the city primarily in the R/ECAP census tracts and surrounding tracts.



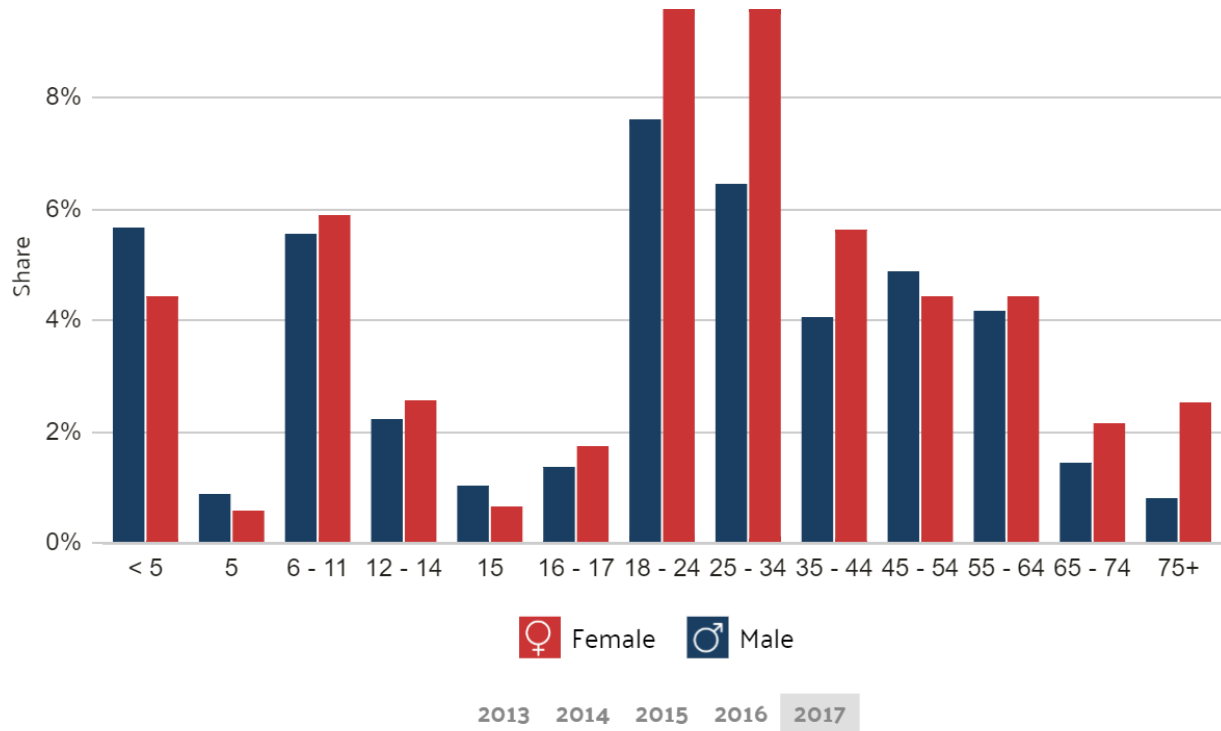
Figure 11: Kent County and Grand Rapids Percent of Households Below Poverty Level



Source: 2013-2017 ACS

Figure 12 is taken from the Data USA Kent County profile. The figure shows the largest demographic living in poverty are females between the ages of 18-24 followed by females 25-34 and males ages 18-24 in Kent County. This is consistent with Grand Rapids' data.

Figure 12: Kent County Poverty by Age and Gender



Source: Data USA Kent County Profile

Grand Rapids has ten census tracts considered areas of racial or ethnic concentrations of poverty (R/ECAPs). The definition, as defined by HUD, involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is a non-white population of 50% or more. The poverty threshold for a neighborhood is one that has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs.

Between 2010 and 2020, the number of R/ECAP census tracts has doubled in Grand Rapids. According to HUD's GIS site, the current R/ECAP census tracts are: 13, 15, 26, 28, 31, 32, 36, 37, 38, 39.<sup>xv</sup> They include the neighborhoods (or parts of neighborhoods) of Baxter, Belknap Lookout, Black Hills, Creston, Garfield Park, Grandville, Oldtown-Heartside, Roosevelt Park, Southeast Community, Southeast End, Southwest, and West Grand. Figure 13 illustrates R/ECAP areas in Grand Rapids, which are also located in the NOFs.



The MIT Living Wage model generates a cost-of-living estimate that exceeds the federal poverty thresholds. As calculated, the living wage estimate accounts for basic family needs. The living wage is the minimum income standard that, if met, draws a very fine line between the financial independence of the working poor and the need to seek public assistance or suffer consistent and severe food insecurity.<sup>xvi</sup> Table 23 provides the living, poverty, and minimum wage amounts for Grand Rapids-Wyoming and Kent County.

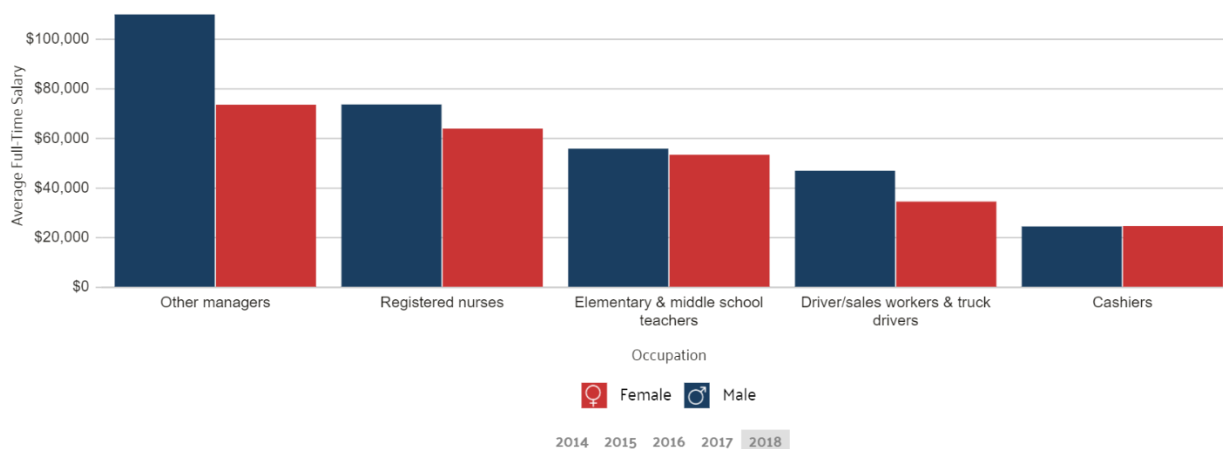
Table 23: Grand Rapids-Wyoming, MI and Kent County Living Wage Calculator

	1 Adult			2 Adults		
	0 Children	1 Child	2 Children	0 Children	1 Child	2 Children
Grand Rapids Living Wage	\$ 11.68	\$ 23.78	\$ 29.31	\$ 18.75	\$ 22.33	\$ 24.84
Kent County Living Wage	\$ 11.46	\$ 23.89	\$ 29.43	\$ 18.70	\$ 22.44	\$ 24.95
Poverty Wage	\$ 6.00	\$ 8.13	\$ 10.25	\$ 8.13	\$ 10.25	\$ 12.38
Minimum Wage	\$ 9.45	\$ 9.45	\$ 9.45	\$ 9.45	\$ 9.45	\$ 9.45

Source: MIT Living Wage Calculator

According to 2019 ACS 1 Year Estimate, females living alone make 1.05 times less than males living alone in Grand Rapids and 1.11 times less in Kent County. Figure 14 shows the gender-based wage disparity in the five most common occupations in Michigan by number of employees. This data was taken from the Data USA Kent County profile.

Figure 14: Wage by Gender in Common Jobs



Source: Data USA Kent County Profile

## Employment

According to The Right Place, since its introduction as the Furniture City in 1876, Grand Rapids and Kent County area businesses have been leaders in quality, technical expertise, and innovation. Grand Rapids and Kent County manufacturing has diversified beyond furniture and now includes advanced manufacturing, communications and information technology, medical devices, food and beverages, and aerospace and defense. Grand Rapids and Kent County are also a leading center for sustainability and renewable energy and excel in commercializing a wealth of new discoveries: anything from pharmaceuticals to iPhone applications. Grand Rapids is the headquarters for Steelcase Inc., the world’s leading designer and manufacturer of office systems, and American Seating Company.

During the last 20 years, the city’s economy has diversified beyond manufacturing into medical services, biomedical research, agribusiness, technology, and higher education sectors which continue to expand. Non-manufacturing employment in the MSA now accounts for 82% of the labor force, leaving 18% of area workers employed in manufacturing.<sup>xvii</sup> Table 24 provides a list of the top ten employers in the Grand Rapids’ MSA.

Table 24: Top Ten Employers in the Grand Rapids MSA

TOP TEN EMPLOYERS IN THE GRAND RAPIDS MSA		
Company	Product or Service	Number of Employees
Spectrum Health	Hospitals, clinics, and medical services	25,000
Meijer, Inc.	Retailer – groceries and general merchandise	10,340
Mercy Health/St. Mary’s	Hospitals, clinics, and medical services	8,500
Gentex Corporation	Class product manufacturing	5,800
Gordon Food Services, Inc.	Wholesale/distribution	5,000
Amway Corporation	Hotels; health, beauty, & home product manufacturing	3,791
Herman Miller, Inc.	Office, commercial, & health industry furniture design manufacturing	3,621
Perrigo Company	Generic & over-the-counter pharmaceuticals	3,500
Steelcase, Inc.	Office, commercial & health industry furniture design and manufacturing	3,500
Farmers Insurance Company	Insurance	3,500

Source: Grand Rapids FY 2021 Final Fiscal Plan

Table 25 and Table 26 show the change in jobs by industry sector between 2007 and 2017 for Grand Rapids and Kent County.

Table 25: 2007 – 2017 Grand Rapids Change in Jobs by Industry

<b>Grand Rapids Jobs by NAICS Industry Sector</b>				
	<b>2007</b>		<b>2017</b>	
	<b>Count</b>	<b>Share</b>	<b>Count</b>	<b>Share</b>
Agriculture, Forestry, Fishing and Hunting	271	0.2%	65	0.1%
Mining, Quarrying, and Oil and Gas Extraction	44	0.0%	21	0.0%
Utilities	21	0.0%	240	0.2%
Construction	3,339	2.8%	2,773	2.4%
Manufacturing	19,707	16.6%	16,556	14.2%
Wholesale Trade	4,465	3.8%	4,478	3.9%
Retail Trade	8,443	7.1%	8,926	7.7%
Transportation and Warehousing	1,611	1.4%	927	0.8%
Information	1,907	1.6%	1,905	1.6%
Finance and Insurance	7,020	5.9%	4,777	4.1%
Real Estate and Rental and Leasing	1,461	1.2%	1,561	1.3%
Professional, Scientific, and Technical Services	6,219	5.2%	7,648	6.6%
Management of Companies and Enterprises	464	0.4%	315	0.3%
Administration & Support, Waste Management and Remediation	6,517	5.5%	9,625	8.3%
Educational Services	10,305	8.7%	9,370	8.1%
Health Care and Social Assistance	31,536	26.6%	28,907	24.9%
Arts, Entertainment, and Recreation	930	0.8%	907	0.8%
Accommodation and Food Services	7,921	6.7%	9,844	8.5%
Other Services (excluding Public Administration)	4,043	3.4%	3,717	3.2%
Public Administration	2,282	1.9%	3,749	3.2%
<b>Total</b>	<b>118,506</b>		<b>116,311</b>	

Source: U.S. Census, OnTheMap Application

Table 26: 2007 – 2017 Kent County Change in Jobs by Industry

<b>Kent County Jobs by NAICS Industry Sector</b>				
	<b>2007</b>		<b>2017</b>	
	<b>Count</b>	<b>Share</b>	<b>Count</b>	<b>Share</b>
Agriculture, Forestry, Fishing and Hunting	1,433	0.4%	1,409	0.4%
Mining, Quarrying, and Oil and Gas Extraction	127	0.0%	78	0.0%
Utilities	668	0.2%	853	0.2%
Construction	14,072	4.4%	15,921	4.2%
Manufacturing	63,235	19.7%	65,511	17.2%
Wholesale Trade	23,580	7.4%	26,687	7.0%
Retail Trade	34,249	10.7%	36,763	9.6%
Transportation and Warehousing	7,842	2.4%	10,659	2.8%
Information	4,162	1.3%	4,317	1.1%
Finance and Insurance	15,808	4.9%	17,117	4.5%
Real Estate and Rental and Leasing	3,814	1.2%	3,663	1.0%
Professional, Scientific, and Technical Services	14,021	4.4%	17,092	4.5%
Management of Companies and Enterprises	4,797	1.5%	6,529	1.7%
Administration & Support, Waste Management and Remediation	26,919	8.4%	47,728	12.5%
Educational Services	23,033	7.2%	23,990	6.3%
Health Care and Social Assistance	43,154	13.5%	55,585	14.6%
Arts, Entertainment, and Recreation	3,019	0.9%	3,579	0.9%
Accommodation and Food Services	22,546	7.0%	26,017	6.8%
Other Services (excluding Public Administration)	9,997	3.1%	12,036	3.2%
Public Administration	4,222	1.3%	5,813	1.5%
<b>Total Jobs</b>	<b>320,698</b>		<b>381,347</b>	

Source: U.S. Census, OnTheMap Application

Table 27 illustrates the number of total primary jobs in Grand Rapids, compared to the total primary jobs held by Grand Rapids’ residents. There is a higher share of residents working in manufacturing jobs, compared to the total share of manufacturing jobs in Grand Rapids. Conversely, the share of residents working in health care and social assistance, is significantly less than the total share of health care and social assistance jobs in Grand Rapids.

Table 27: Grand Rapids Total Jobs Compared to Resident Held Jobs

2017 Jobs by NAICS Industry Sector (Grand Rapids)				
	All Jobs		Resident-held Jobs	
	Count	Share	Count	Share
Agriculture, Forestry, Fishing and Hunting	65	0.1%	640	0.8%
Mining, Quarrying, and Oil and Gas Extraction	21	0.0%	23	0.0%
Utilities	240	0.2%	225	0.3%
Construction	2,773	2.4%	2,682	3.2%
Manufacturing	16,556	14.2%	14,210	16.8%
Wholesale Trade	4,478	3.9%	4,632	5.5%
Retail Trade	8,926	7.7%	7,588	8.9%
Transportation and Warehousing	927	0.8%	2,159	2.5%
Information	1,905	1.6%	1,040	1.2%
Finance and Insurance	4,777	4.1%	3,396	4.0%
Real Estate and Rental and Leasing	1,561	1.3%	933	1.1%
Professional, Scientific, and Technical Services	7,648	6.6%	4,366	5.1%
Management of Companies and Enterprises	315	0.3%	1,243	1.5%
Administration & Support, Waste Management and Remediation	9,625	8.3%	8,258	9.7%
Educational Services	9,370	8.1%	6,544	7.7%
Health Care and Social Assistance	28,907	24.9%	13,566	16.0%
Arts, Entertainment, and Recreation	907	0.8%	807	1.0%
Accommodation and Food Services	9,844	8.5%	7,897	9.3%
Other Services (excluding Public Administration)	3,717	3.2%	3,055	3.6%
Public Administration	3,749	3.2%	1,543	1.8%
<b>Total</b>	<b>116,311</b>		<b>84,807</b>	

Source: U.S. Census, OnTheMap Application

Table 28 illustrates the number of total primary jobs in Kent County, compared to the total primary jobs held by Kent County residents. The data shows that Kent County residents hold most of the jobs located in Kent County.



Table 28: Kent County Total Jobs Compared to Resident Held Jobs

<b>2017 Jobs by NAICS Industry Sector (Kent County)</b>				
	<b>All Jobs</b>		<b>Resident-held Jobs</b>	
	<b>Count</b>	<b>Share</b>	<b>Count</b>	<b>Share</b>
Agriculture, Forestry, Fishing and Hunting	2,431	0.8%	2,431	0.8%
Mining, Quarrying, and Oil and Gas Extraction	120	0.0%	120	0.0%
Utilities	851	0.3%	852	0.3%
Construction	12,244	4.0%	12,244	4.0%
Manufacturing	53,716	17.6%	53,716	17.5%
Wholesale Trade	17,960	5.9%	17,960	5.9%
Retail Trade	30,016	9.8%	30,017	9.8%
Transportation and Warehousing	8,315	2.7%	8,317	2.7%
Information	3,702	1.2%	3,714	1.2%
Finance and Insurance	12,649	4.1%	12,675	4.1%
Real Estate and Rental and Leasing	3,491	1.1%	3,491	1.1%
Professional, Scientific, and Technical Services	14,955	4.9%	14,956	4.9%
Management of Companies and Enterprises	4,336	1.4%	4,336	1.4%
Administration & Support, Waste Management and Remediation	26,544	8.7%	26,544	8.7%
Educational Services	25,189	8.2%	25,190	8.2%
Health Care and Social Assistance	44,390	14.5%	44,566	14.5%
Arts, Entertainment, and Recreation	3,579	1.2%	3,581	1.2%
Accommodation and Food Services	24,858	8.1%	24,859	8.1%
Other Services (excluding Public Administration)	10,660	3.5%	10,660	3.5%
Public Administration	5,907	1.9%	6,267	2.0%
<b>Total</b>	<b>305,913</b>		<b>306,496</b>	

Source: U.S. Census, OnTheMap Application

## Unemployment

According to ESRI 2019 Estimate, the unemployment rate for Grand Rapids was 5.3% compared to 3.58% for Kent County. The metric represents the monthly percentage of the civilian labor force, aged 16 and older, that is unemployed and actively seeking work. Actively seeking work is defined as networking, applying, or interviewing for prospective employment.

Table 29 shows unemployment by gender for Grand Rapids and Kent County. Unemployment is significantly higher for women with children under the age of 18, signaling that there may be a need to provide childcare or other supportive services.

Table 29: Grand Rapids and Kent County Unemployment

Unemployment by Gender	Grand Rapids	Kent County
Male	5.50%	3.10%
Female	4.30%	3.60%
Female w/ Children Under 18	7.60%	3.40%

Source: 2019 ACS 1-Year Estimates

Table 30 shows unemployment by race and ethnicity for Grand Rapids and Kent County. As the table shows, there is a disproportionate rate of unemployment for Blacks and Hispanics. The higher rate of unemployment for Blacks over Hispanics does not correlate with educational attainment given that Blacks are more educated than Hispanics in Grand Rapids and Kent County.

Table 30: Unemployment by Race/Ethnicity

	Grand Rapids	Kent County
White	3.5%	3.1%
Black	10.6%	9.1%
Asian	-	3.5%
Other	-	7%
Hispanic	5.6%	4.2%

Source: 2019 ACS 1-Year Estimates

The labor force includes all people classified in the civilian labor force, plus members of the U.S. Armed Forces (people on active duty with the United States Army, Air Force, Navy, Marine Corps, or Coast Guard). The civilian labor force consists of people classified as employed or unemployed. The labor force participation rate represents the proportion of the population that is in the labor force.<sup>xviii</sup> Table 31 shows the labor force participation rate in Grand Rapids and Kent County by race and ethnicity. Table 32 shows the participation rate by gender. The labor force participation rate is significantly lower in both Grand Rapids and Kent County for Blacks and women.

Table 31: Labor Force Participation by Race/Ethnicity

<b>Race/Ethnicity</b>	<b>Grand Rapids</b>	<b>Kent County</b>
Population 16 and over	68.50%	69.60%
White	70.10%	69.50%
Black	58.10%	63.00%
Hispanic	71.10%	76.20%
Asian	No data	68.30%
Some other race alone	No data	78.90%

Source: 2019 ACS 1-Year Estimates

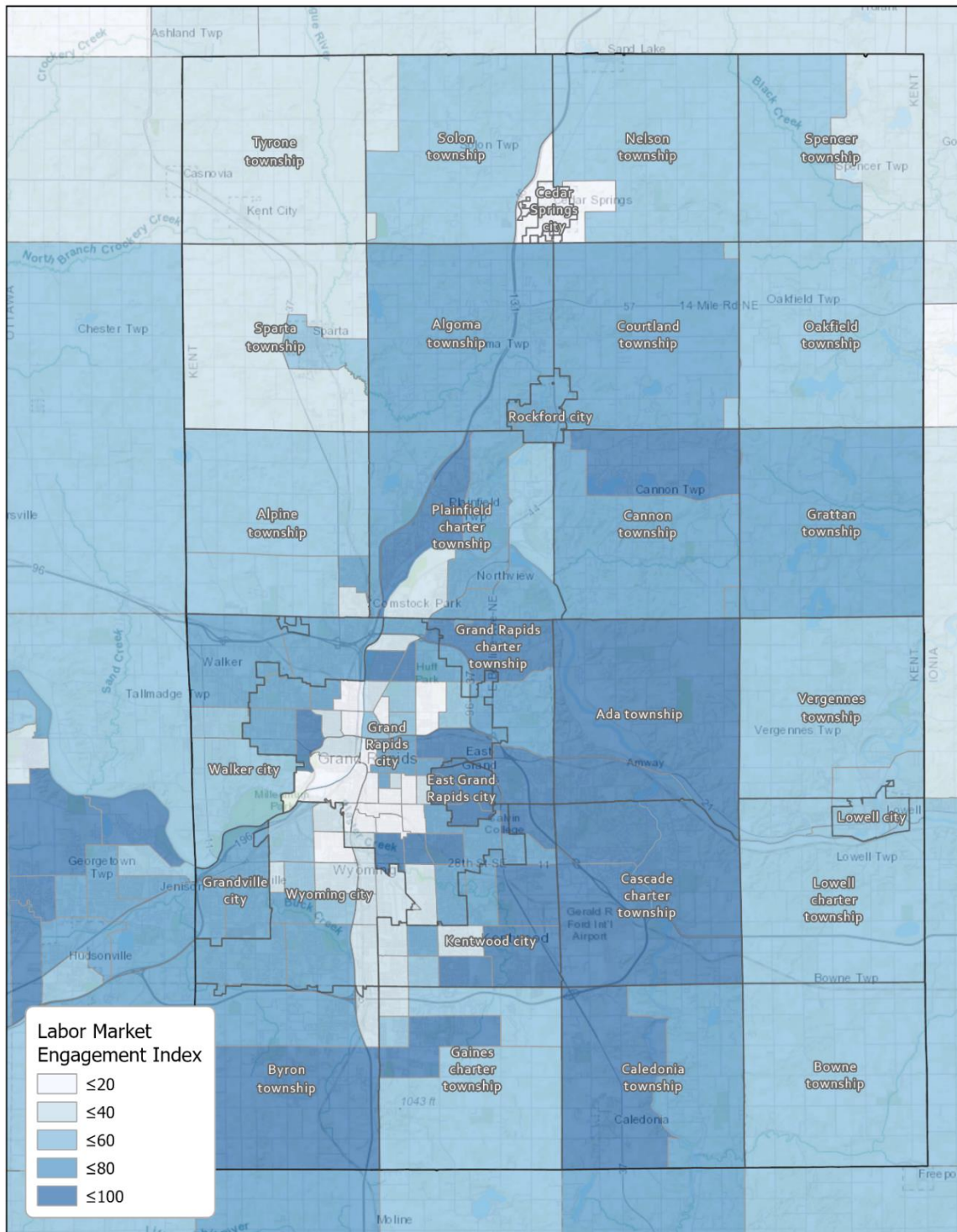
Table 32: Labor Force Participation by Gender

<b>Gender</b>	<b>Grand Rapids</b>	<b>Kent County</b>
Male	83.40%	88.10%
Female	75.60%	78.10%
Female w/ Children Under 18	76.10%	79.10%

Source: 2019 ACS 1-Year Estimates

Figure 15 shows labor market engagement for Grand Rapids and Kent County. The labor market index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in the neighborhood. Both maps show a higher level of participation outside of Grand Rapids, Kentwood, and Wyoming. These three cities have higher percentages of Black and Hispanic residents. This is supported by the data provided in Table 31, which shows that labor market participation is lower for Blacks.

Figure 15: Grand Rapids and Kent County Labor Market Engagement



Source: HUD e-GIS Storefront

**Commute**

Table 33: 2014-2018 Grand Rapids and Kent County Work Commute Times provides commute times for city and county residents. The average commute time to work for Grand Rapids residents is 19.1 minutes compared to 21.3 minutes for Kent County residents.

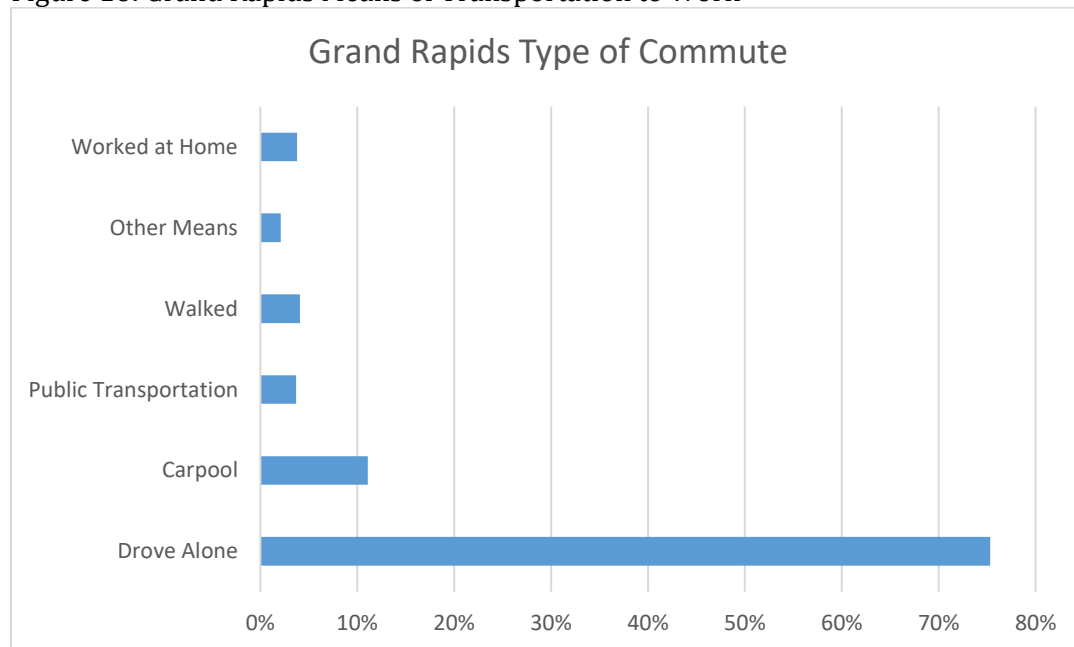
Table 33: 2014-2018 Grand Rapids and Kent County Work Commute Times

Commute Times (Minutes)	Grand Rapids		Kent County	
< 5	2,429	2.58%	8,176	2.64%
5-9	12,352	13.12%	34,116	11.02%
10-14	18,795	19.96%	51,910	16.76%
15-19	21,218	22.53%	62,867	20.30%
20-24	17,200	18.26%	58,640	18.94%
25-29	5,241	5.57%	24,650	7.96%
30-34	7,502	7.97%	32,263	10.42%
35-39	1,662	1.76%	6,790	2.19%
40-44	1,960	2.08%	6,943	2.24%
45-59	2,901	3.08%	12,132	3.92%
60-89	1,972	2.09%	6,846	2.21%
90+	940	1.00%	4,328	1.40%

Source: ESRI Business Analyst

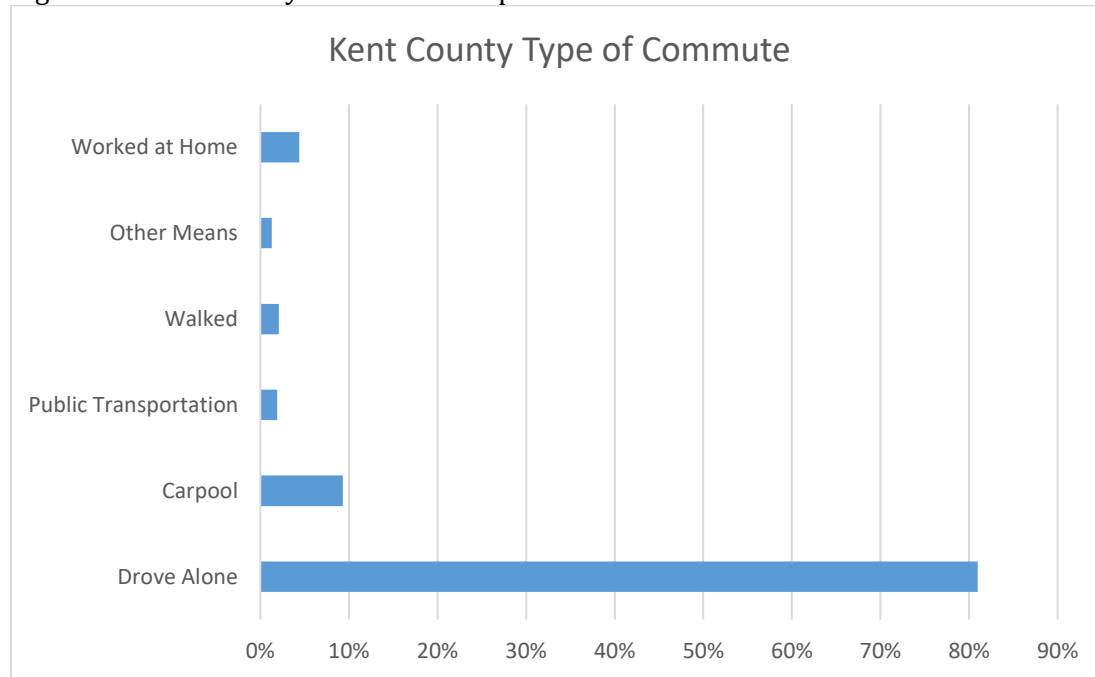
90% of the workforce worked in the state and county of residence while 10% worked outside the county. Figure 16 shows the means of transportation to work for Grand Rapids and Figure 17 for Kent County.

Figure 16: Grand Rapids Means of Transportation to Work



Source: Source: 2019 ACS Survey 5 – Year Estimates

Figure 17: Kent County Means of Transportation to Work



Source: 2019 ACS Survey 5 – Year Estimates

### Public Transit

Diverse transportation options increase housing options by expanding connections between residential and job locations. The Interurban Transit Partnership was formed in 2000 to operate a public transportation system named The Rapid to provide services for the Grand Rapids' metro area and beyond. It is organized and operated under the Michigan Public Act 196 of 1986 with a 15-member board of directors representing the six municipalities in the service area. Beyond its fixed routes, The Rapid also operates demand response services for seniors and people with disabilities, and car and vanpooling programs for those living outside the fixed-route service area.

Transportation access has been an issue in Kent County for some time. In 2009, the Grand Valley Metropolitan Council undertook a Kent County Transit Needs Assessment. The assessment found:

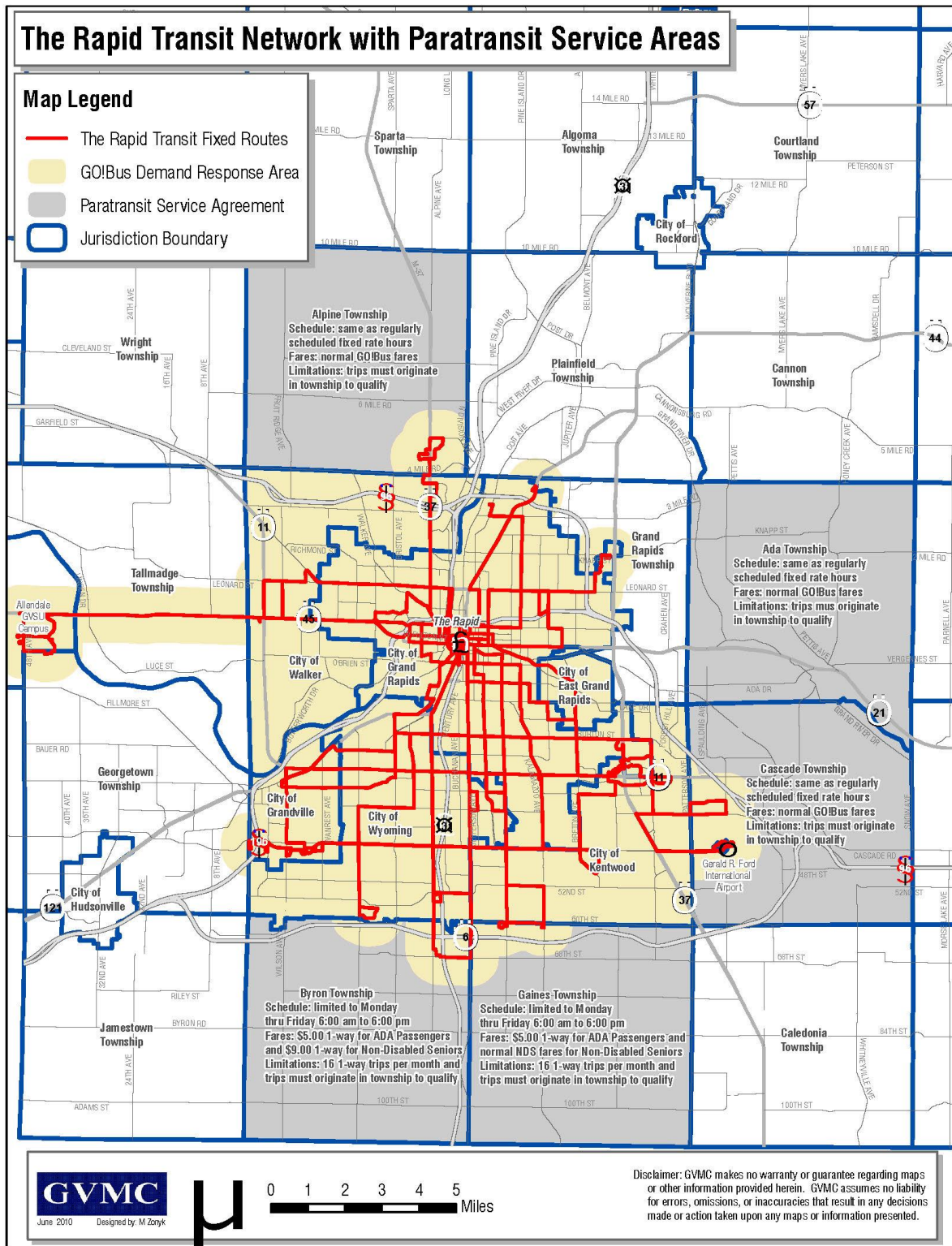
- There was a patchwork of transportation services throughout Kent County, each with its own program eligibility requirements, which were difficult for the public to understand.
- Development continued to grow outside of the ITP / Rapid service areas.
- Kent County was aging with the over 65 age group increasing by 48% over the next 10 years
- There was no long-term, adequate and stable funding source for public transportation outside of the ITP / Rapid service areas.

The assessment's final recommendation was to expand the Go!Bus routes and create a curb-to-curb demand response system for the balance of Kent County with opportunities to expand.<sup>xix</sup>

Since that time, the Center for Transportation Excellence touted Grand Rapids as the "learning laboratory for leaders around the country." Voters also approved a property tax increase in 2011 to

extend the Silver Line more than nine miles south along U.S. Route 131, into the cities of Wyoming and Kentwood. In 2017, voters extended the tax that supports its operations for another 12 years. The 1.47 mill renewal was passed by voters in Grand Rapids, East Grand Rapids, Grandville, Kentwood, Walker and Wyoming raising about \$14.8 million and covers about 34% of The Rapid's total \$43.6 million budget. While routes are well connected through the county, there is concern with how often the service runs. Figure 18 shows the network and service area.<sup>xx</sup>

Figure 18: Public Transportation System

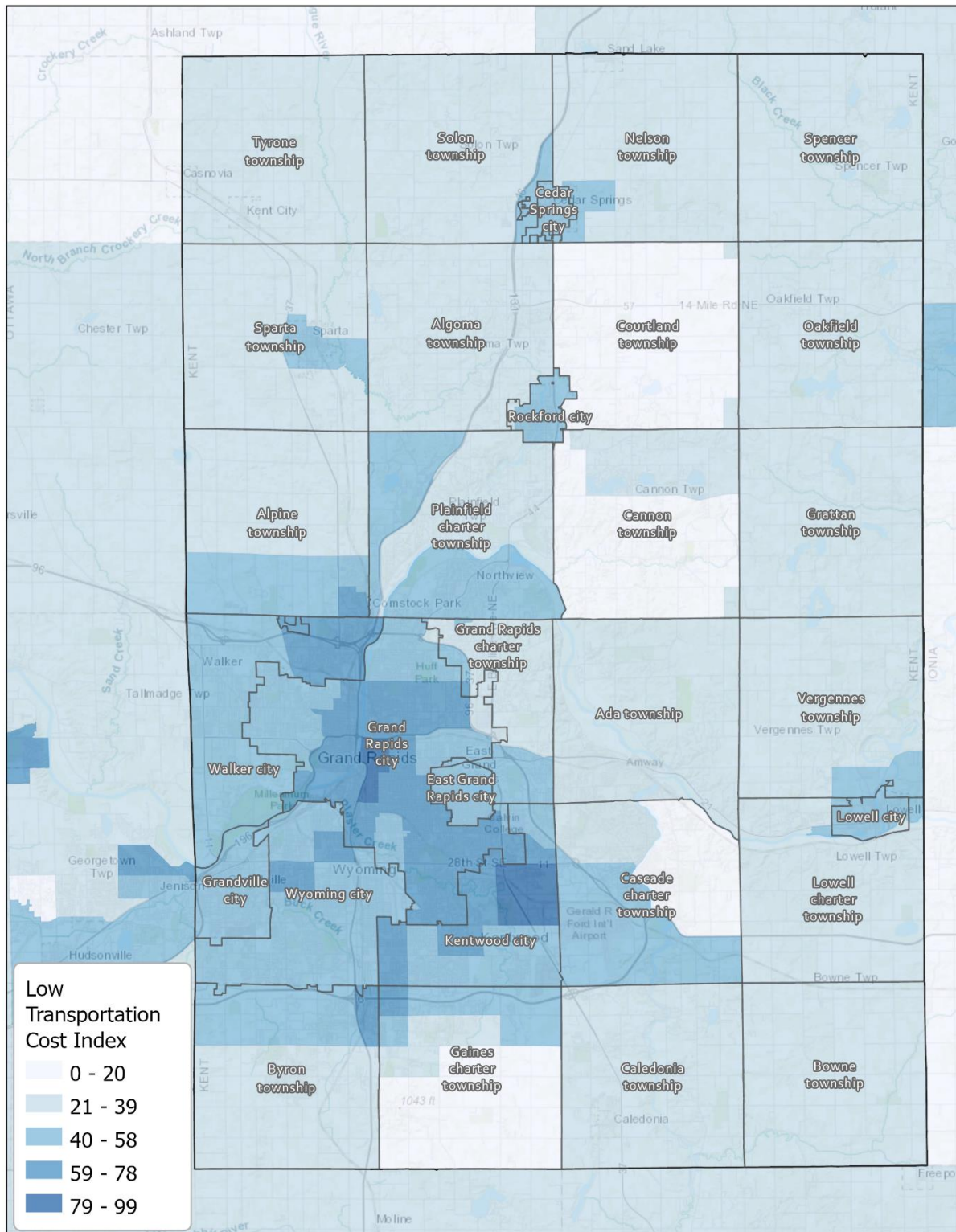


Source: Grand Valley Metro Council



Many focus group members expressed concerns about the transportation systems and their connectivity to places of employment. Transportation challenges were a key concern of northern Kent County residents, where there are very limited public transportation options. Figure 19 illustrates the Low Transportation Cost Index for Grand Rapids and Kent County. As the map illustrates, the index is higher (meaning transportation costs are lower) in the dense urban areas versus the rural parts of Kent County. This is largely the result of higher retail and job clusters in the urban areas, along with a more robust and dense transportation system.

Figure 19: Grand Rapids and Kent County Low Transportation Cost Index



Source: HUD eGIS Storefront

## Housing Profile

Table 34 provides an overview of housing units in Grand Rapids and Kent County. There is a higher level of homeownership in Kent County than in Grand Rapids.

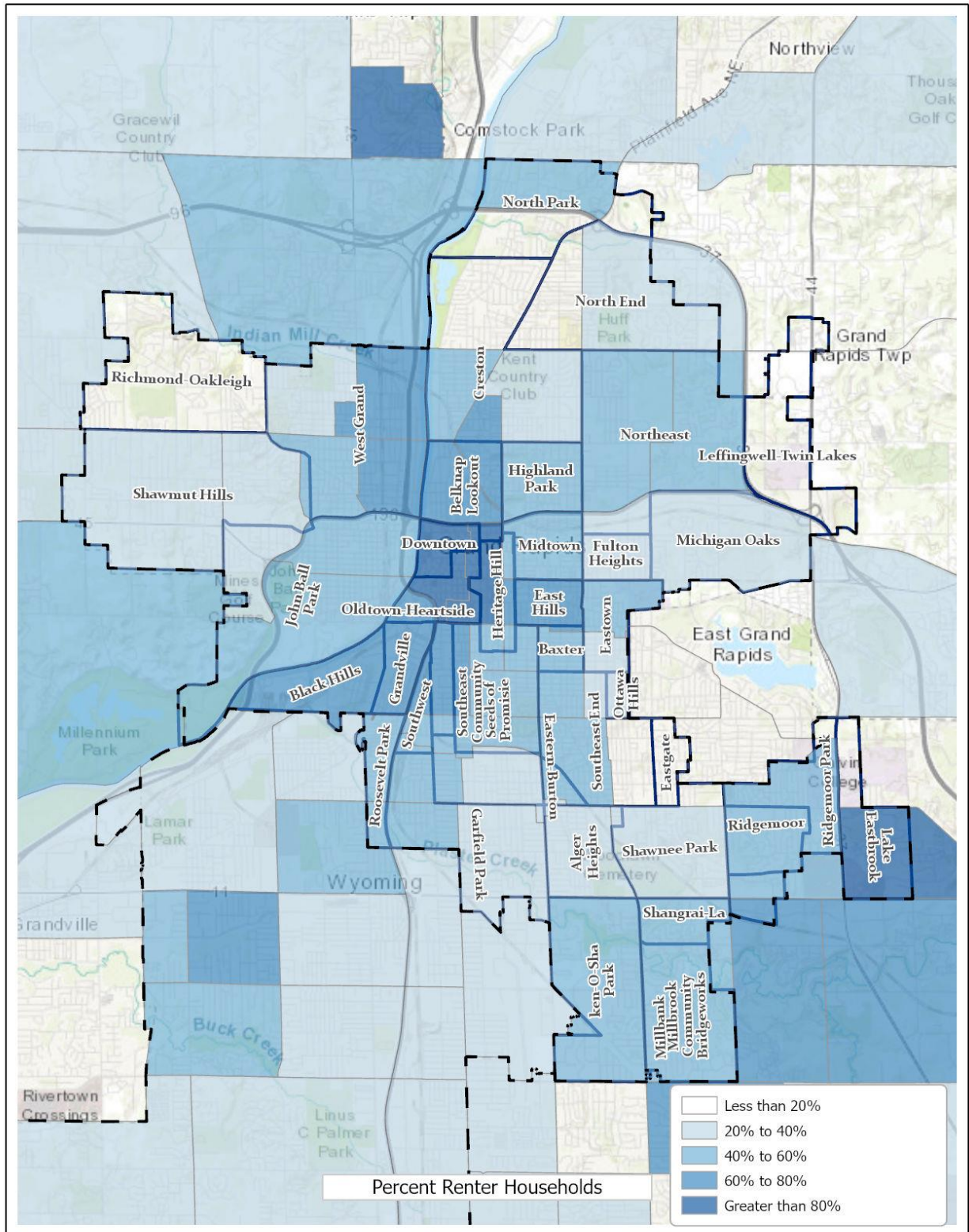
Table 34: Housing Profile

	<b>Grand Rapids</b>	<b>Kent County</b>
Total Housing Units	85,707	263,040
Owner Occupied Units	53.53%	67.96%
Renter Occupied Units	46.47%	32.04%
Vacant	9.30%	6.43%

Source: ESRI 2019 Estimate

Figure 20 shows the percent of renter-occupied housing in Grand Rapids, while Figure 21 shows the percent of owner-occupied housing. Figure 22 shows the percent of renter-occupied housing in Kent County, while Figure 23 shows the percent of owner-occupied housing.

Figure 20: Grand Rapids Renter Households



Source: 2013-2017 CHAS







### Affordable Housing

HUD defines cost-burdened families as those “who pay more than 30% of their income for housing” and “may have difficulty affording necessities such as food, clothing, transportation, and medical care.” Severe rent burden is defined as paying more than 50% of one’s income on rent.<sup>xxi</sup> The Census defines monthly owner costs as the sum of payments for mortgages, deeds of trust, contracts to purchase, or similar debts on the property. It also includes, where appropriate, the monthly condominium fee for condominiums and mobile home costs.<sup>xxii</sup>

Gross rent is the amount of the contracted rent plus the estimated average monthly cost of utilities (electricity, gas, water, and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid for by the renter (or paid for the renter by someone else).<sup>xxiii</sup> Table 35 shows gross rent for Grand Rapids and Kent County. The average gross rent in Grand Rapids is \$947, and the median gross rent is \$895. Approximately 42.5% of renters pay between \$800 - \$1,250 for rent with the largest group (17.75%) paying \$1,000 - \$1,249 in both Grand Rapids and Kent County.

Table 35: Grand Rapids and Kent County Gross Rent

	Grand Rapids		Kent County	
No Gross Rent	1,079	3.17%	2,889	3.90%
<\$100	174	0.51%	188	0.25%
\$100-\$149	64	0.19%	155	0.21%
\$150-\$199	143	0.42%	258	0.35%
\$200-\$249	973	2.85%	1,287	1.74%
\$250-\$299	416	1.22%	773	1.04%
\$300-\$349	543	1.59%	842	1.14%
\$350-\$399	230	0.67%	516	0.70%
\$400-\$449	298	0.87%	755	1.02%
\$450-\$499	593	1.74%	1,044	1.41%
\$500-\$549	652	1.91%	1,407	1.90%
\$550-\$599	973	2.85%	2,137	2.89%
\$600-\$649	1,555	4.56%	3,534	4.77%
\$650-\$699	1,977	5.80%	5,127	6.93%
\$700-\$749	1,730	5.08%	4,979	6.73%
\$750-\$799	2,227	6.53%	5,668	7.66%
\$800-\$899	4,145	12.16%	9,767	13.19%
\$900-\$999	4,312	12.65%	9,573	12.93%
\$1,000-\$1,249	6,048	17.75%	12,420	16.78%
\$1,250-\$1,499	2,791	8.19%	5,224	7.06%
\$1,500-\$1,999	2,274	6.67%	4,113	5.56%
\$2,000-\$2,499	772	2.27%	979	1.32%
\$2,500-\$2,999	84	0.25%	179	0.24%
\$3,000-\$3,499	28	0.08%	90	0.12%
\$3,500+	0	0.00%	131	0.18%

Source: ESRI 2019 Estimate



The tables below show cost burden data for renters and owners in Grand Rapids and Kent County. Table 36 and Table 40 indicate that renters have greater affordability challenges than homeowners. Lower income residents are more likely to have a high housing cost burden, which can lead to eviction or foreclosure, deferred maintenance, or reduced spending on other necessary items such as food, childcare, medical expenses, and transportation. Households with high-cost burden are at risk for a housing crisis which can lead to episodes of homelessness.

Table 36: Housing Cost Burden – Grand Rapids

Housing Cost Burden	Owner		Renter		Total	
Less than 30%	32,265	80.80%	16,040	47.87%	48,305	65.78%
30% to 50%	4,730	11.85%	6,965	20.79%	11,695	15.93%
Greater than 50%	2,710	6.79%	9,765	29.14%	12,475	16.99%
Cost Burden not available	220	0.55%	725	2.16%	945	1.29%
Total	39,930	100.00%	33,505	100.00%	73,435	100.00%

Source: 2013 - 2017 CHAS

Table 36 illustrates that over 32% of all Grand Rapids households are cost burdened, and nearly 17% are severely cost burdened. Not surprisingly, renters are more likely to be cost burdened. Over 50% of renter households are cost burdened, compared with 18% of owner households. The number of severely cost burdened renter households is nearly four times higher than homeowners.

The prevalence of cost burdened households is most evident when also evaluating income. Table 37 illustrates the number of cost burdened and severely cost burdened owner and renter households by income categories. Of the cost burdened households, nearly 42% are households earning less than 30% AMI. Households earning less than 50% AMI represent 74% of all cost burdened households in Grand Rapids.

Table 37: Income by Cost Burden (Owners and Renters) – Grand Rapids

	Cost Burden > 30%		Severe Cost Burden > 50%		Total Households	
0 - 30% AMI	1,629	6.74%	8,565	35.42%	10,194	42.16%
30% - 50% AMI	4,550	18.82%	3,225	13.34%	7,775	32.16%
50% - 80% AMI	4,200	17.37%	585	2.42%	4,785	19.79%
80% to - 100% AMI	675	2.79%	90	0.37%	7,65	3.16%
Greater than 100% AMI	640	2.65%	20	0.08%	6,60	2.73%
Total	11,694	48.36%	12,485	51.64%	24,179	100.00%

Source: 2013 – 2017 CHAS

Table 38 and Table 39 illustrate cost burden households by tenure and income. Renter households are far more likely to be cost burdened in Grand Rapids. There are 16,740 cost burdened renter households, compared to 7,439 owner households. Very low income renters make up almost half of all cost burdened renter households.

Table 38: Housing Cost Burden by Income (Renters) – Grand Rapids

	Cost Burden > 30%		Severe Cost Burden > 50%		Total Households	
0 - 30% AMI	940	5.62%	6,975	41.67%	7,915	47.28%
30% - 50% AMI	3,260	19.47%	2,490	14.87%	5,750	34.35%
50% - 80% AMI	2,250	13.44%	240	1.43%	2,490	14.87%
80% to - 100% AMI	265	1.58%	50	0.30%	315	1.88%
Greater than 100% AMI	250	1.49%	20	0.12%	270	1.61%
Total	6,965	41.61%	9,775	58.39%	16,740	100.00%

Source: 2013 – 2017 CHAS

Table 39: Housing Cost Burden by Income (Owners) – Grand Rapids

	Cost Burden > 30%		Severe Cost Burden > 50%		Total Households	
0 - 30% AMI	689	9.26%	1,590	21.37%	2,279	30.64%
30% - 50% AMI	1,290	17.34%	735	9.88%	2,025	27.22%
50% - 80% AMI	1,950	26.21%	345	4.64%	2,295	30.85%
80% to - 100% AMI	410	5.51%	40	0.54%	450	6.05%
Greater than 100% AMI	390	5.24%	0	0.00%	390	5.24%
Total	4,729	63.57%	2,710	36.43%	7,439	100.00%

Source: 2013 – 2017 CHAS

Kent County renters have a higher proportion of households experiencing housing cost burden than owners as illustrated in Table 40. Over 44% of renter households have a cost burden over 30%, compared to approximately 16% of homeowners.

Table 40: Housing Cost Burden – Kent County

Housing Cost Burden	Owner		Renter		Total	
Less than 30%	134,805	82.56%	40,260	54.67%	175,065	73.89%
30% to 50%	17,865	10.94%	15,560	21.13%	33,425	14.11%
Greater than 50%	9,805	6.00%	16,720	22.71%	26,525	11.20%
Cost Burden not available	815	0.50%	1,105	1.50%	1,920	0.81%
Total	163,290	100.00%	73,640	100.00%	236,930	100.00%

Source: 2013 - 2017 CHAS

Table 41 - Table 43 illustrate cost burdened county households by income and tenure. There are 59,995 cost burdened households in the county. Nearly 32,275 are renters and 27,680 are owners. Over 78% of the cost burdened renters earn less than 50% AMI, compared to approximately 50% of cost burdened homeowners. Nearly 11% of Kent County cost burdened homeowners earn more than 100% AMI, which speaks to the high cost of rental housing in the region.

Table 41: Housing Cost Burden by Income (Renters and Owners) – Kent County

	Cost Burden > 30%		Severe Cost Burden > 50%		Total Households	
0 - 30% AMI	3,690	6.15%	17,510	29.21%	21,200	35.36%
30% - 50% AMI	12,120	20.22%	6,215	10.37%	18,335	30.58%
50% - 80% AMI	11,525	19.22%	2,165	3.61%	13,690	22.83%
80% to - 100% AMI	3,040	5.07%	275	0.46%	3,315	5.53%
Greater than 100% AMI	3,050	5.09%	365	0.61%	3,415	5.70%
Total	33,425	55.75%	26,530	44.25%	59,955	100.00%

Source: 2013 – 2017 CHAS

Table 42: Housing Cost Burden by Income (Renters) – Kent County

	Cost Burden > 30%		Severe Cost Burden > 50%		Total Households	
0 - 30% AMI	1,765	5.47%	12,275	38.03%	14,040	43.50%
30% - 50% AMI	7,640	23.67%	3,765	11.67%	11,405	35.34%
50% - 80% AMI	5,140	15.93%	510	1.58%	5,650	17.51%
80% to - 100% AMI	640	1.98%	75	0.23%	715	2.22%
Greater than 100% AMI	370	1.15%	95	0.29%	465	1.44%
Total	15,555	48.20%	16,720	51.80%	32,275	100.00%

Source: 2013 – 2017 CHAS

Table 43: Housing Cost Burden by Income (Owners) – Kent County

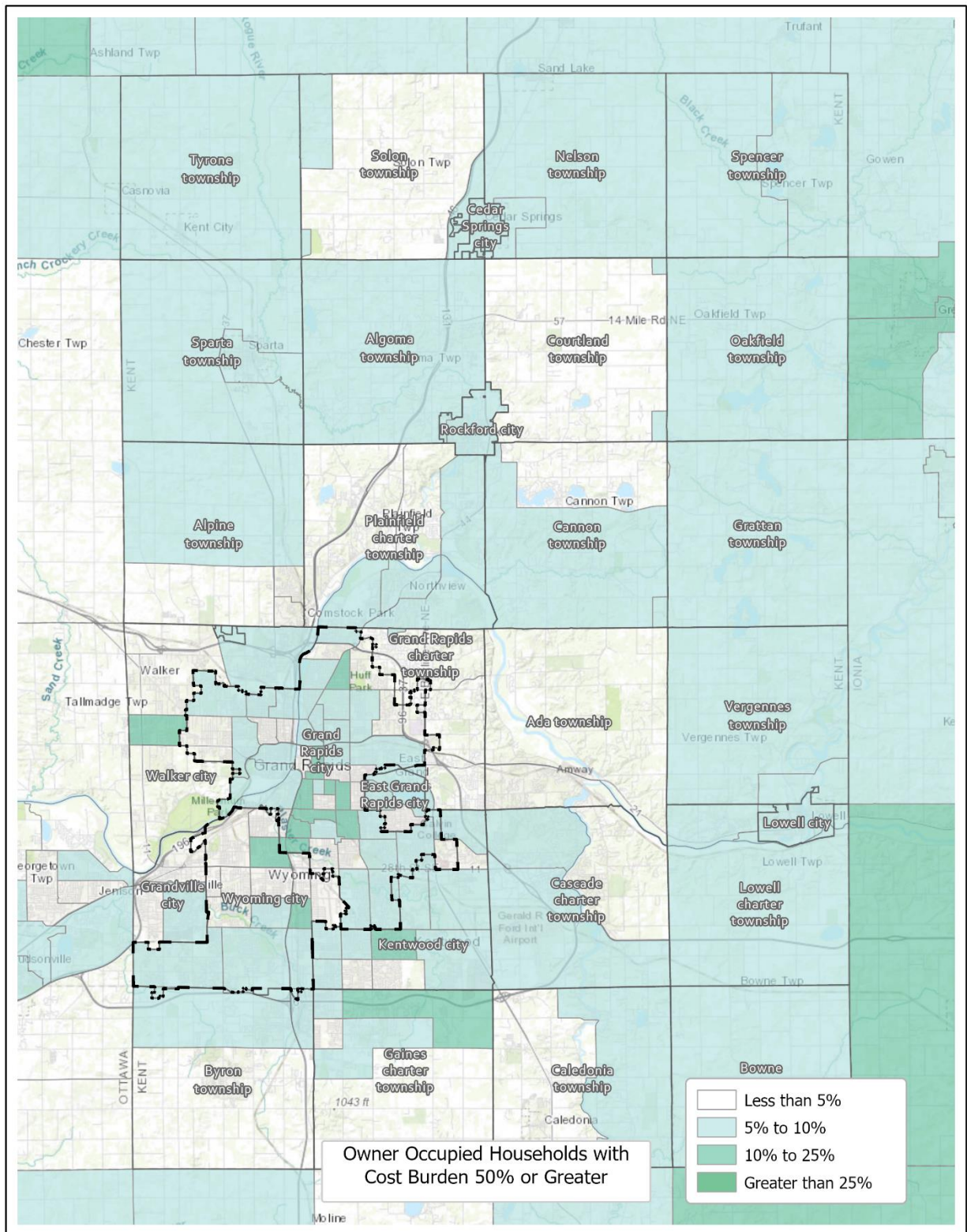
	Cost Burden > 30%		Severe Cost Burden > 50%		Total Households	
0 - 30% AMI	1,925	6.95%	5,235	18.91%	7,160	25.87%
30% - 50% AMI	4,480	16.18%	2,450	8.85%	6,930	25.04%
50% - 80% AMI	6,385	23.07%	1,655	5.98%	8,040	29.05%
80% to - 100% AMI	2,400	8.67%	200	0.72%	2,600	9.39%
Greater than 100% AMI	2,680	9.68%	270	0.98%	2,950	10.66%
Total	17,870	64.56%	9,810	35.44%	27,680	100.00%

Source: 2013 – 2017 CHAS

Programs to reduce cost burden among homeowners should target housing operating costs, such as reducing utility costs by improving the efficiency of doors, windows, HVAC systems and appliances. Additionally, first-time homebuyer programs should provide enough assistance to reduce the mortgage amounts so monthly housing costs are less than 30% of their household income.



Figure 25: Kent County Owner Occupied Households with 50% or Greater Cost Burden



Source: 2013 - 2017 CHAS

HUD sets income limits that determine eligibility for assisted housing programs including Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county. Table 44 shows the income limits for FY 2020 for the Grand Rapids-Wyoming, MI HUD Metro FMR Area.

Table 44: FY 2020 Income Limits

	Persons in Family							
	1	2	3	4	5	6	7	8
Extremely Low Income* (30% AMI)	\$16,850	\$19,250	\$21,720	\$26,200	\$30,680	\$35,160	\$39,640	\$44,120
Very Low Income (50% AMI)	\$28,100	\$32,100	\$36,100	\$40,100	\$43,350	\$46,550	\$49,750	\$52,950
Low Income (80% AMI)	\$44,950	\$51,350	\$57,750	\$64,150	\$69,300	\$74,450	\$79,550	\$84,700

Source: HUDUSER FY 2020 Income Limits Documentation System

Fair Market Rents (FMRs) are used to determine payment standard amounts for the Housing Choice Voucher program, to determine initial renewal rents for some expiring project-based Section 8 contracts, to determine initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solution Grants program, calculation of maximum award amounts for Continuum of Care recipients and the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds, and calculation of flat rents in Public Housing units.<sup>xxiv</sup>

Table 45: Fair Market Rent by Number of Units

FY 2020 & FY 2019 FMRs by Unit Bedroom					
Year	Efficiency	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms
FY 2020	\$686	\$789	\$962	\$1,296	\$1,481
FY 2019	\$620	\$736	\$903	\$1,241	\$1,418

Source: FY 2020 Fair Market Rent Documentation System

Based on the average family size of 3.23 for Grand Rapids and 3.18 for Kent County, the income limits used to determine housing assistance would be based on a family size of three or four. Table 46 provides an overview of housing cost at 30% and 50% of median income for a family of three and four. It is assumed that a family would need two bedrooms at \$962 or three bedrooms at \$1,296.

Table 46: Rental Cost for a Family of Three or Four Based on Income Level

	Family of 3			Family of 4		
	Median Income	30% AMI	50% AMI	Median Income	30% AMI	50% AMI
Extremely Low Income (30%)	\$21,720.00	\$543.00	\$905.00	\$26,200.00	\$655.00	\$1,091.67
Very Low Income (50%)	\$36,100.00	\$902.50	\$1,504.17	\$40,100.00	\$1,002.50	\$1,670.83
Low Income (80%)	\$57,750.00	\$1,443.75	\$2,406.25	\$64,150.00	\$1,603.75	\$2,672.92

Source: Recreated from HUD Income Limits and Fair Market Rent Data

### Homeownership

Property ownership has historically been one means of creating generational wealth and ending generational poverty, and homeownership has been the initial property investment.

Homeownership can also have a positive impact on neighborhood stability and health. According to the ESRI 2019 Estimate, the homeownership rate in Grand Rapids is 56.5% compared to Kent County at 69.1%.

For many families, housing is the biggest component of wealth. The relationship between housing and family wealth is complex. On the one hand, the ability to purchase a home reflects wealth a family already has, as significant funds are generally required for a down payment and closing costs. On the other hand, homeownership has also been found to yield strong financial returns on average and to be a key channel through which families build.<sup>xxv</sup> The history of redlining has left cities with a pattern of segregated lending that disproportionately holds Black and Hispanic communities back from building wealth.

Homeownership plays a bigger role in creating wealth for Black families than it does for White families. Housing equity makes up nearly 60% of total net worth for Black homeowners, compared with 43% of total net worth for White homeowners. Although homeownership should not be the only focus of public policy and wealth building for Black households, it is a solid foundation for building wealth, even with total wealth accumulation being less when compared with accumulation for White homeowners.<sup>xxvi</sup>

Table 47 illustrates homeownership rates by race and ethnicity in Grand Rapids and Kent County. Based on the data, there is a significant disparity between White homeownership and Black and Hispanic homeownership based on their total population representation.

Table 47: Homeownership Rate by Race/Ethnicity

Race/Ethnicity	Grand Rapids		Kent County	
	Count	Rate	Count	Rate
White	31,450	42.81%	144,075	60.81%
Black	4,390	5.98%	6,705	2.83%
American Indian or Alaska Native	135	0.18%	340	0.14%
Asian	474	0.65%	3,265	1.38%
Pacific Islander	-	0.00%	10	0.00%
Other (including multiple races)	480	0.65%	1,625	0.69%
Hispanic	3,015	4.10%	7,280	3.07%

Source: ESRI 2019 Estimate

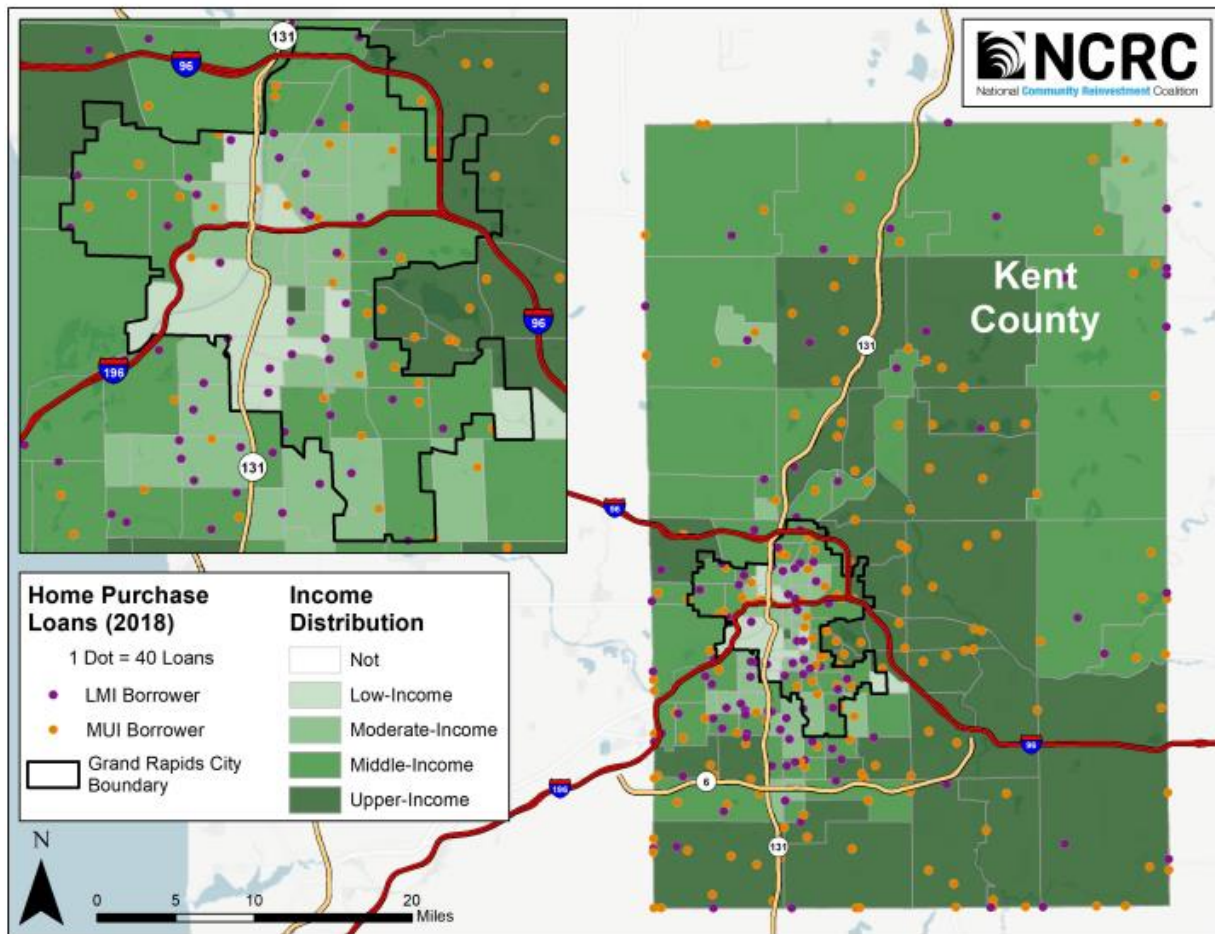
Majority Minority and low- to moderate-income (LMI) neighborhoods across the nation frequently receive less mortgage and business lending than other areas. High levels of racial and economic segregation often mean that residents of those neighborhoods have fewer bank branches and get fewer loans to service their credit needs. Figure 26 shows most low-to-moderate income loans are within Grand Rapids and in the southwest portion of the County with most of those loans were in moderate to middle income areas. The lack of mortgage lending in specific communities often signals a lack of wealth in those communities and in the families who live there.

The National Community Reinvestment Coalition (NCRC) provided a Fair Lending Report for Kent County. The data provided in the report is based on the following data:

- 2018 Home Mortgage Disclosure Act Data
- 2018 Consumer Finance Protection Bureau Data
- 2011 - 2015 American Community Survey (time-period used for HMDA reports)



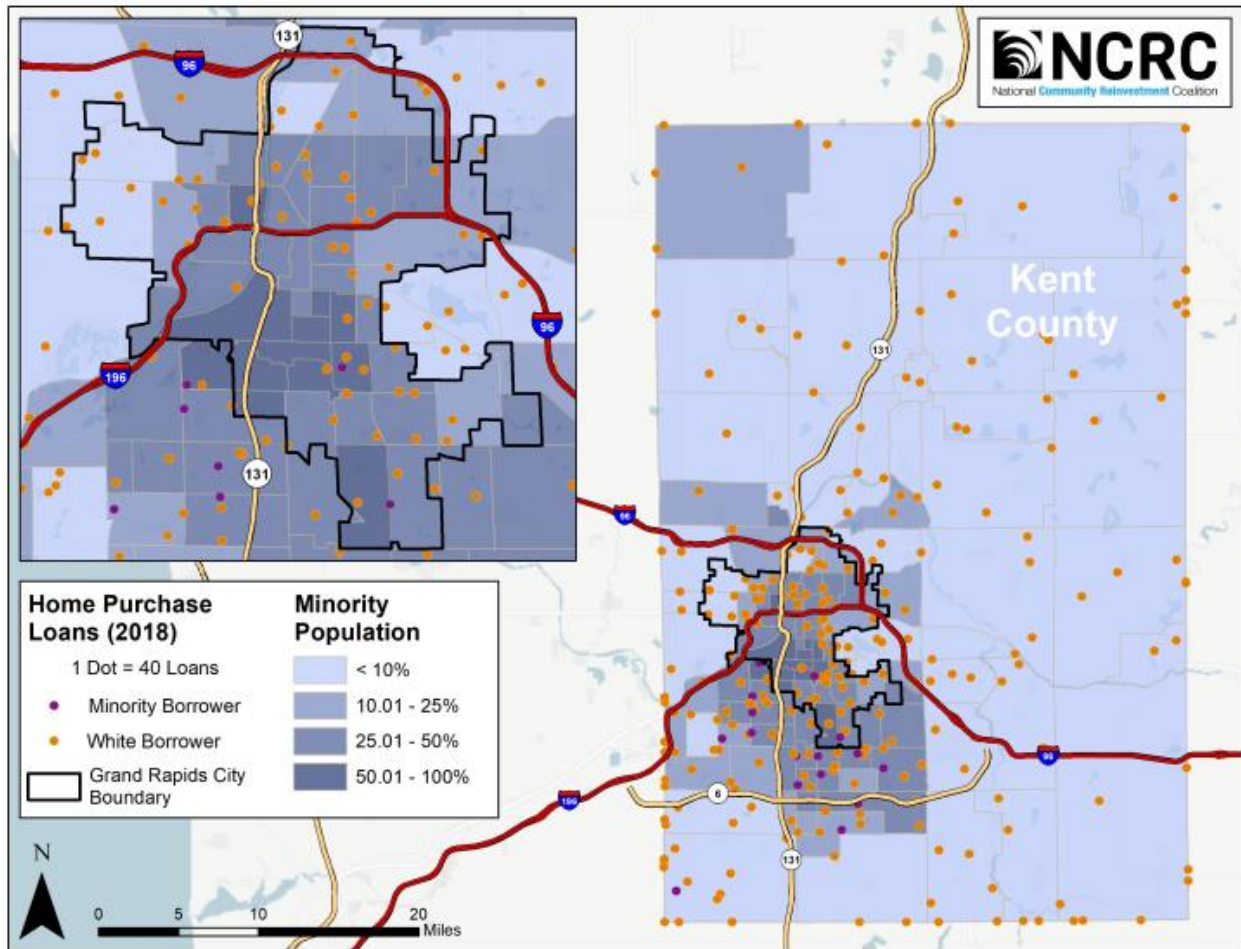
Figure 26: Home Purchase Lending by Neighborhood Income



Source: NCRC Kent County Fair Lending Report

Figure 27 shows when race is factored, there is a lending disparity between White and Minority borrowers.

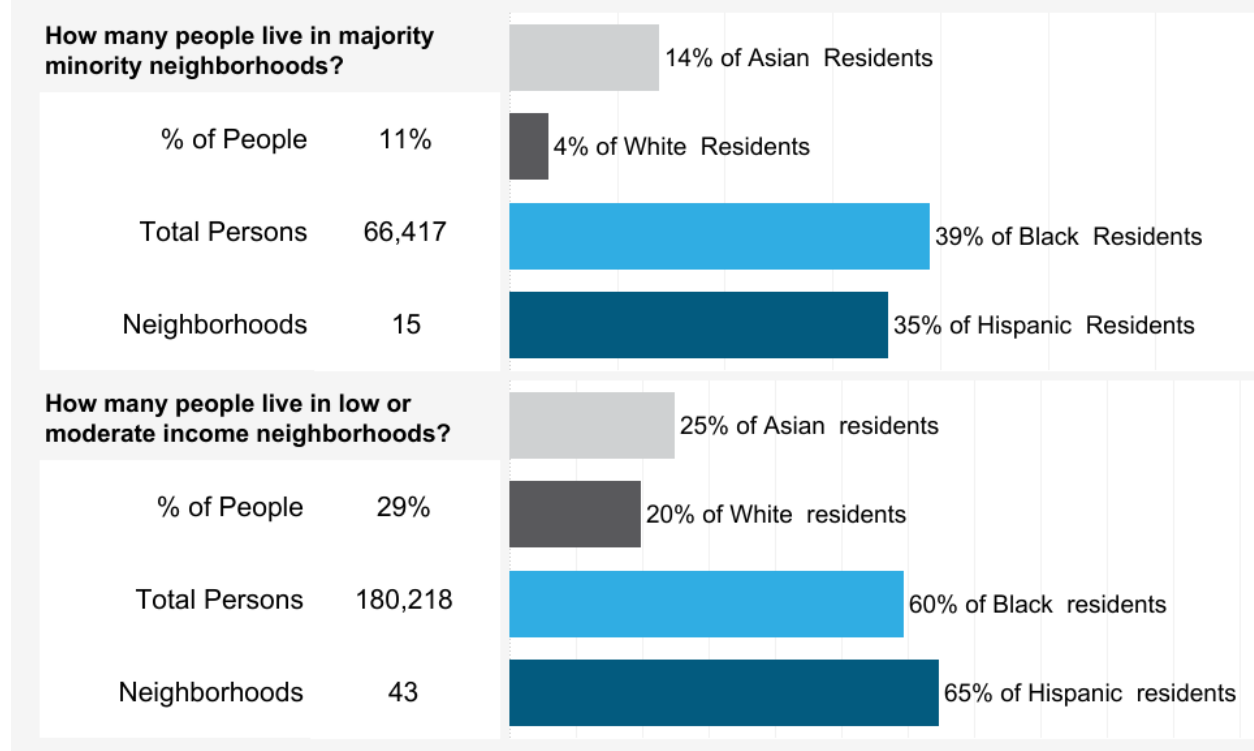
Figure 27: Home Purchase Lending by Borrower Race



Source: NCRC Kent County Fair Lending Report

Figure 28 provides a breakdown of Majority Minority and Low-to-Moderate Income (LMI) neighborhoods for Kent County.

Figure 28: Kent County Majority Minority and LMI Neighborhood Demographics



Source: 2020 NCRC Kent County Fair Lending Report

Figure 29 shows the percentage of loans to borrowers by race and income. If the share of loans going to LMI neighborhoods is significantly lower than the percentage of the population that lives in the area, it is an indicator of disinvestment. As shown in Figure 28, 11% of Kent County residents live in minority majority neighborhoods and only 6.1% of loans have been made in those neighborhoods. Approximately 29% of residents live in LMI neighborhoods with only 19.2% of loans being made in those neighborhoods.

Figure 29: Lending by Race and Income of the Borrower

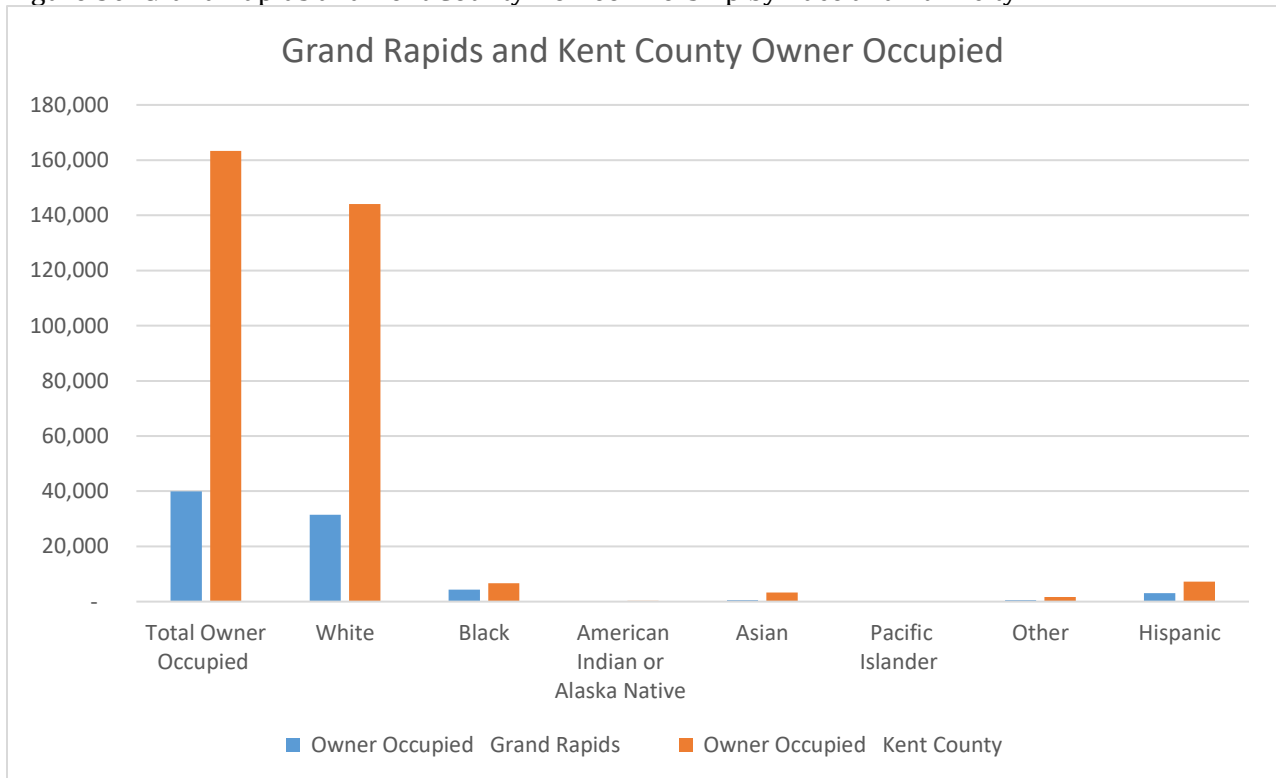
		Percent of Loans
Middle or Upper Income Neighborhood	Middle or Upper Income Borrower	57.1%
	Low or Moderate Income Borrower	23.7%
	<b>Total</b>	<b>80.8%</b>
Low or Moderate Income Neighborhood	Middle or Upper Income Borrower	7.5%
	Low or Moderate Income Borrower	11.7%
	<b>Total</b>	<b>19.2%</b>
White Majority Neighborhood	White	86.8%
	Hispanic	3.6%
	Black	2.4%
	Asian	1.1%
	<b>Total</b>	<b>93.9%</b>
Minority Majority Neighborhood	White	4.0%
	Black	1.0%
	Hispanic	0.9%
	Asian	0.2%
	<b>Total</b>	<b>6.1%</b>

Source:

2020 NCRC Kent County Fair Lending Report

**Error! Not a valid bookmark self-reference.** shows homeownership by race and ethnicity for Grand Rapids and Kent County. Disparities in homeownership are impacted by the person’s ability to access a loan. Figure 31 lists denial rates by bank, while Figure 32 breaks down the reasons for denials.

Figure 30: Grand Rapids and Kent County Homeownership by Race and Ethnicity



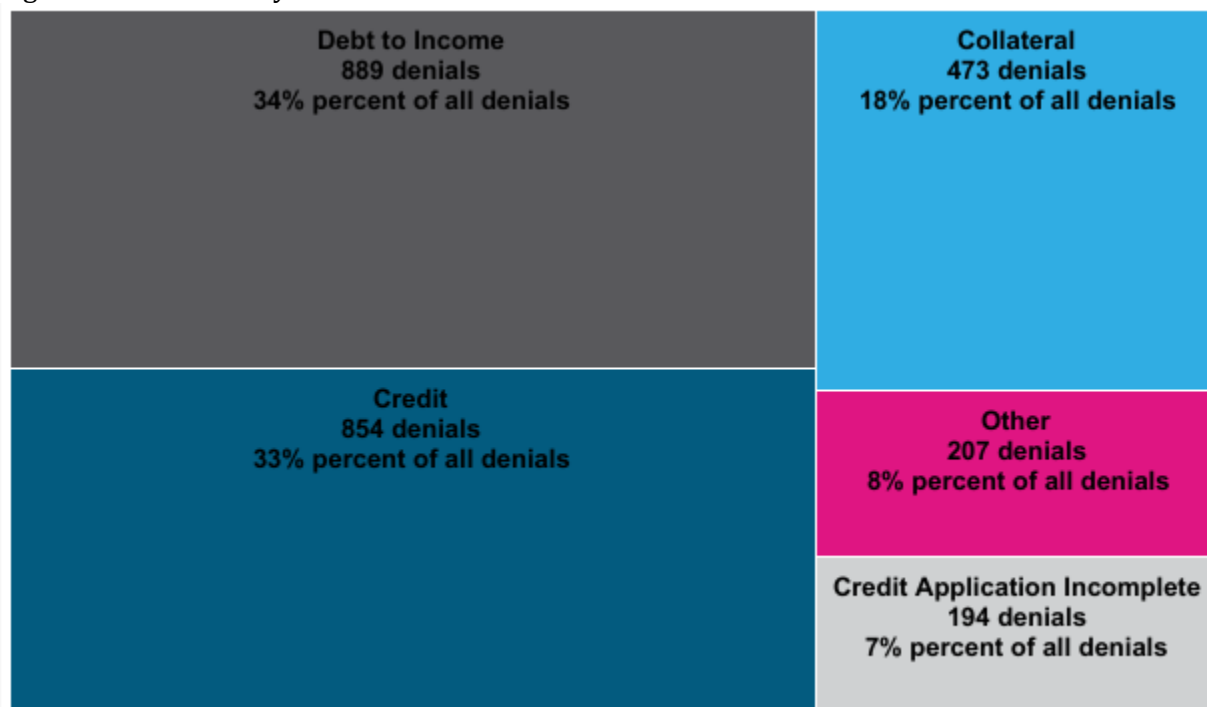
Source: ESRI 2019 Estimate

Figure 31: Kent County Loan Denial Rates

		White/Asian Applicant	Black/Hispanic Applicant	Difference
<b>Grand Total</b>		12.7%	24.7%	12.0%
<b>Bank or Affiliate</b>	<b>Total</b>	17.5%	33.6%	16.1%
	Fifth Third Bank	15.4%	33.0%	17.6%
	The Huntington National Bank	17.3%	26.1%	8.8%
	JPMorgan Chase	27.3%	56.5%	29.2%
	Chemical Bank	12.4%	20.0%	7.6%
	Independent Bank	8.2%	12.0%	3.8%
	Flagstar Bank	22.5%	36.4%	13.9%
	PNC Bank	19.2%	40.7%	21.5%
	Old National Bank	8.3%	12.5%	4.2%
	Bank Of America	33.1%	68.3%	35.2%
	The Dart Bank	2.2%	0.0%	-2.2%
	Wells Fargo Bank	38.9%	55.6%	16.6%
	Mercantile Bank Of Michigan	11.4%	21.1%	9.7%
<b>Credit Union</b>	<b>Total</b>	8.8%	17.6%	8.9%
	Lake Michigan CU	8.9%	18.8%	9.9%
	Consumers	8.5%	5.4%	-3.1%
	Adventure CU	6.3%	19.0%	12.7%
<b>Mortgage Company</b>	<b>Total</b>	7.6%	10.0%	2.4%
	Amerifirst Financial Corporation	1.9%	2.8%	0.9%
	Quicken Loans	17.2%	23.8%	6.5%
	Mortgage 1orporated	1.6%	1.9%	0.3%
	Finance Of America Mortgage	2.8%	4.5%	1.8%
	Ark-La-Tex Financial Services	11.9%	17.4%	5.5%

Source: 2020 NCRC Kent County Fair Lending Report

Figure 32: Kent County Loan Denial Reasons



Source: 2020 NCRC Kent County Fair Lending Report

In addition to gaps in homeownership, there are also significant gaps in home values among homeowners by race and ethnicity. For homeowners, the typical White families' home value is \$230,000 and families other than Blacks, Hispanics, and Whites' home value is \$310,000. The typical Black and Hispanic families' home values are lower, at \$150,000 and \$200,000, respectively. Gaps in home values are caused both by gaps in purchase prices and housing appreciation, which are a reflection of a combination of factors including resource gaps (e.g., income and down payments), residential segregation, and age of entry into homeownership.<sup>xxvii</sup>

The median home value in Grand Rapids was \$143,904, and the average was \$171,569. The median home value in Kent County was \$185,410, and the average was \$228,296. A race breakdown of home values was not available.

### Lending

The Community Reinvestment Act (CRA) of 1977 was enacted to end redlining and requires financial institutions to meet the credit needs of communities in which they do business, including LMI neighborhoods. The term refers to the presumed practice of mortgage lenders drawing red lines around portions of a map to indicate areas of neighborhoods in which they do not want to make loans. The prohibition against redlining does not mean that a lending institution is expected to approve all housing loan applications or to make all loans on identical terms. Denying loans or granting loans on more stringent terms and conditions, however, must be justified based on economic factors.<sup>xxviii</sup>

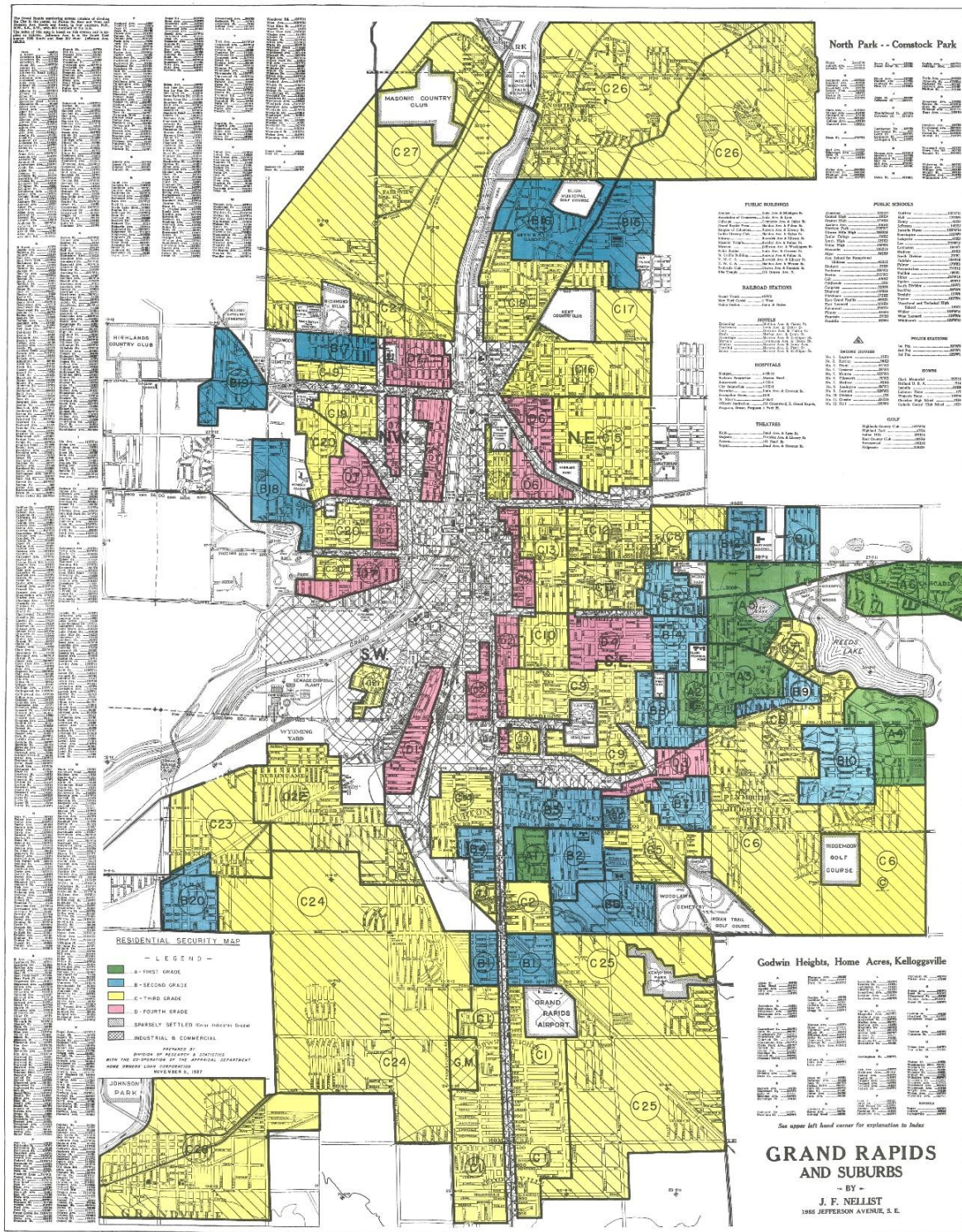
A federal agency, the Homeowners' Loan Corporation (HOLC) created "Residential Security" maps of major American cities. These maps document how loan officers, appraisers, and real estate professionals evaluated mortgage lending risk during the era immediately before the surge of suburbanization in the 1950s. HOLC examiners consulted with local bank loan officers, city

officials, appraisers, and realtors to create these maps. Examiners systemically graded neighborhoods based on criteria related to the age and condition of housing, transportation access, closeness to amenities such as parks or dis-amenities like polluting industries, the economic class and employment status of residents, and their ethnic and racial composition. Neighborhoods were color coded on maps: green for the “Best”, blue for the “Still Desirable”, yellow for “Definitely Declining, and red for “Hazardous.” Neighborhoods considered high risk, or “Hazardous” were often “redlined” by lending institutions, denying them access to capital investment, which could improve the housing and economic opportunity of residents. Comparing maps with current economic and demographics of neighborhoods reveal a persistent pattern of both economic and racial residential exclusion. As stated in an NCRC report, redlining buttressed the segregated structure of American cities. Most of the neighborhoods (74%) that the HOLC graded as high risk or “Hazardous” eight decades ago are low-to-moderate income today and mostly minority neighborhoods. <sup>xxix</sup>

Figure 33 is the HOLC map for Grand Rapids. When comparing the map below to current day maps, we see the Hazardous areas in the HOLC maps are now considered racial and ethnically concentrated areas of poverty. City and community leaders can access a comparison of the HOLC map to the economic conditions of the redlined communities today on the website of the [National Community Reinvestment Coalition](#).



Figure 33: Grand Rapids Homeowners Loan Corporation (HOLC) Redlining Map



Source: Mapping Inequality

Samira Salem, Credit Union National Association (CUNA) senior policy analyst, completed a study in the summer of 2019 that found community-chartered credit unions located a higher percentage of their branches in low-income areas and middle- and moderate-income areas compared to a higher percentage of bank branches in higher income communities. The access to a branch network created greater opportunities for minority and LMI borrowers to access lending products. Table 48 provides an overview of the top mortgage lenders in Kent County, and Table 49 provides a list of the top home purchase lenders. Lake Michigan Credit Union (LMCU) leads in mortgage lending with 4,634 loans followed by Fifth Third with 1,787 loans and Huntington with 1,475.

Table 48: Kent County Top Mortgage Lenders (all loans)

		<b>Loans Originated by Lender</b>	<b>Loans Purchased by Lender</b>	<b>Total Loans</b>
Lake Michigan Credit Union	Credit Union	4,633	1	4,634
Fifth Third Bank	Bank or Affiliate	1,392	395	1,787
The Huntington National Bank	Bank or Affiliate	1,443	32	1,475
Amerifirst Financial Corporation	Mortgage Company	1,093		1,093
JPMorgan Chase Bank	Bank or Affiliate	606	225	831
Quicken Loans	Mortgage Company	786		786
Wells Fargo Bank	Bank or Affiliate	112	538	650
Independent Bank	Bank or Affiliate	611	1	612
Chemical Bank	Bank or Affiliate	542		542
Flagstar Bank	Bank or Affiliate	367	74	441
Mortgage 1 Inc	Mortgage Company	339		339
Old National Bank	Bank or Affiliate	308	23	331
Amerihome Mortgage	Mortgage Company	8	316	324
Finance of America Mortgage	Mortgage Company	304		304
PNC Bank	Bank or Affiliate	287		287
The Dart Bank	Bank or Affiliate	236		236
Ark-La-Tex Financial Services	Mortgage Company	222		222
Consumers	Credit Union	215		215

Source: 2020 NCRC Kent County Fair Lending Report

Table 49: Kent County Top Home Purchase Lenders

		Loans Originated by Lender	Loans Purchased by Lender	Total Loans
Lake Michigan Credit Union	Credit Union	2,174		2,174
Amerifirst Financial Corporation	Mortgage Company	1,008		1,008
Fifth Third Bank	Bank or Affiliate	471	245	716
Wells Fargo Bank	Bank or Affiliate	44	372	416
Independent Bank	Bank or Affiliate	378	1	379
JPMorgan Chase Bank	Bank or Affiliate	188	154	342
The Huntington National Bank	Bank or Affiliate	307	28	335
Mortgage 1 Inc	Mortgage Company	302		302
Finance of America Mortgage	Mortgage Company	267		267
Amerihome Mortgage	Mortgage Company		260	260
Flagstar Bank	Bank or Affiliate	185	56	241
Chemical Bank	Bank or Affiliate	239		239
Quicken Loans	Mortgage Company	212		212
The Dart Bank	Bank or Affiliate	190		190
Old National Bank	Bank or Affiliate	184	3	187
Ark-La-Tex Financial Services	Mortgage Company	182		182
Consumers	Credit Union	88		88
PNC Bank	Bank or Affiliate	49		49

Source: 2020 NCRC Kent County Fair Lending Report

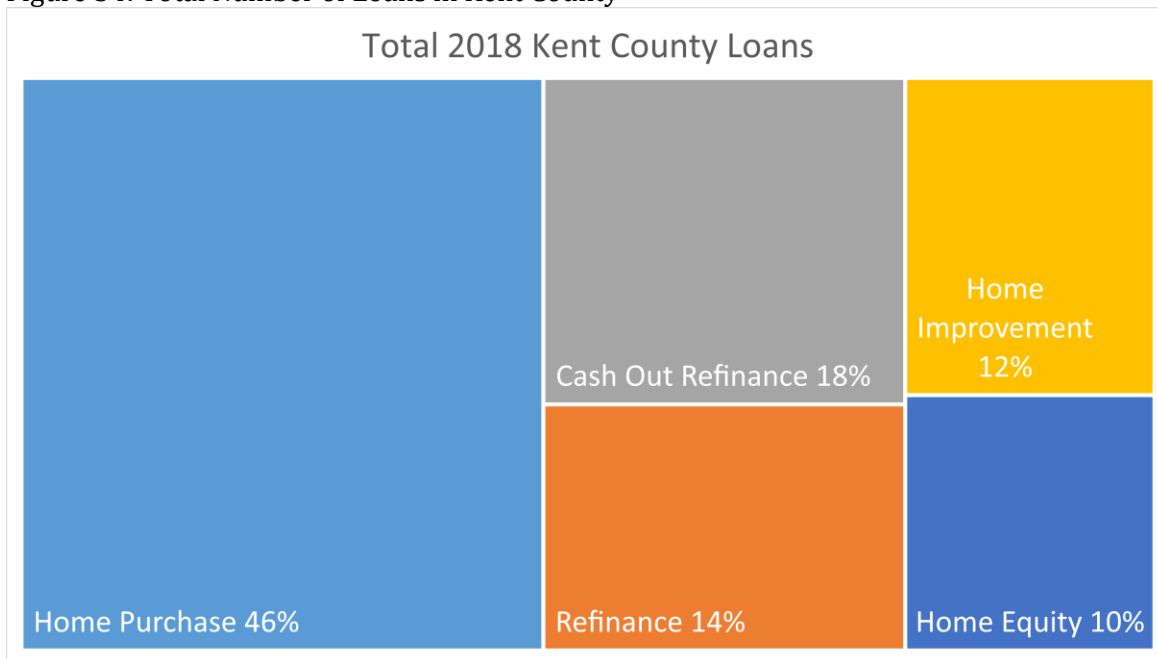
Table 50: Kent County Loan Types by Lender

		Bank or Affiliate	Mortgage Company	Credit Union
Loans Originated by Lender	Home Purchase	3,173	3,767	2,612
	Refinance	963	529	812
	Cash Out Refinance	1,464	1,171	583
	Home Improvement	918	36	1,351
	Home Equity	1,093	16	590
Loans Purchased by Lender	Home Purchase	1,046	801	5
	Refinance	141	55	5
	Cash Out Refinance	232	136	6
	Home Improvement	4	15	
	Home Equity	16	2	1

Source: NCRC Kent County Fair Lending Report

Table 50 illustrates the type of loans originated and purchased in Kent County by type of loan. Examining the types of loans can shed insight into homeowner’s behavior in particular housing markets. For example, a high number of home improvement loans is an indication of reinvestment into neighborhoods. However, high numbers of “cash out refinancing” loans are typically indicators of an escalating housing market where existing homeowners are tapping into the new found equity to do other things besides reinvesting into their homes. Cash out refinancing loans comprised nearly 18% of all lending, indicating property owners were taking advantage of rising home values and equity.

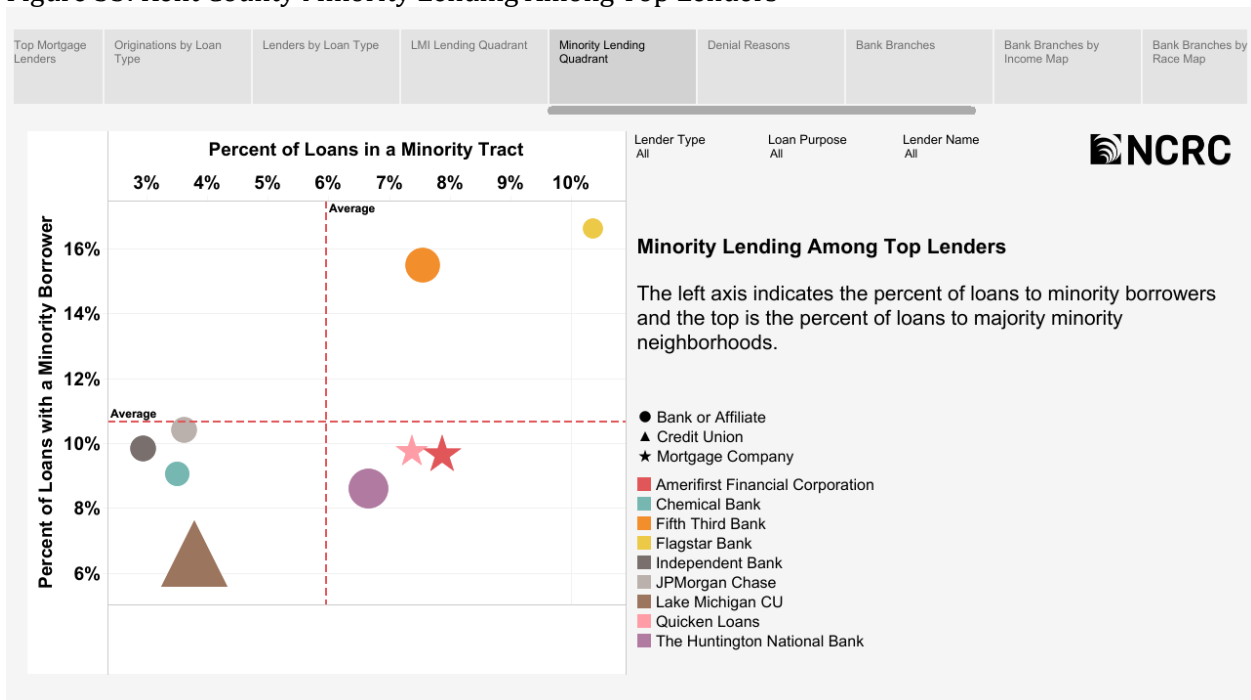
Figure 34: Total Number of Loans in Kent County



Source: NCRC Kent County Fair Lending Report

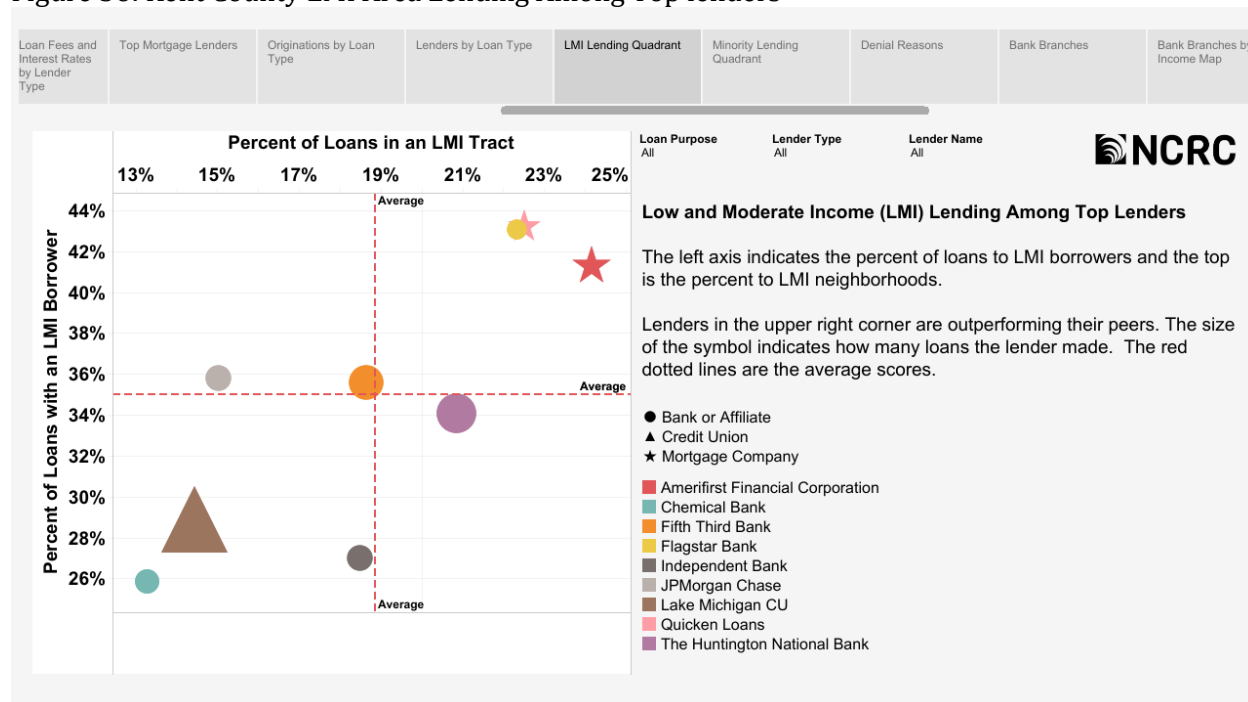
Figure 35 shows Fifth Third and Flagstar leading in the percentage of loans to minorities and in minority tracts and Figure 36 shows Flagstar, Quicken, and Amerifirst Financial Corporation leading in loans to LMI borrowers and tracts. However, LMCU higher loan volume translates to more loans for minority and LMI borrowers and in tracts with a percentage of minority and LMI borrowers.

Figure 35: Kent County Minority Lending Among Top Lenders



Source: NCRC Kent County Fair Lending Report

Figure 36: Kent County LMI Area Lending Among Top Lenders



Source: NCRC Kent County Fair Lending Report

Government insured lending reduces the risk of default on loans and makes products more accessible to minority and low-to-moderate income individuals. These types of loans are particularly important for those with higher debt-to-income ratios. Approximately one-third of loan denials are due to debt-to-income ratio and another third due to credit.

A **conventional loan** is not part of a specific government program. Conventional loans typically cost less than FHA loans but can be more difficult to get. There are two main categories of conventional loans:

*Conforming* loans have maximum loan amounts that are set by the government. Other rules for conforming loans are set by Fannie Mae or Freddie Mac, companies that provide backing for conforming loans.

*Non-conforming* loans are less standardized. Eligibility, pricing, and features can vary widely by lender, so it is important to shop around and compare several offers.

**FHA** loans are loans from private lenders that are regulated and insured by the Federal Housing Administration (FHA), a government agency. Private lenders lend on behalf of the FHA.

FHA loans allow for down payments as low as 3.5% and lower credit scores, which helps borrowers who may not qualify for conventional financing. However, FHA loans have higher fees than conventional loans.

For borrowers with good credit and a medium (10-15%) down payment, FHA loans tend to be more expensive than conventional loans. For borrowers with lower credit scores or a smaller down payment, FHA loans can often be the cheapest option.

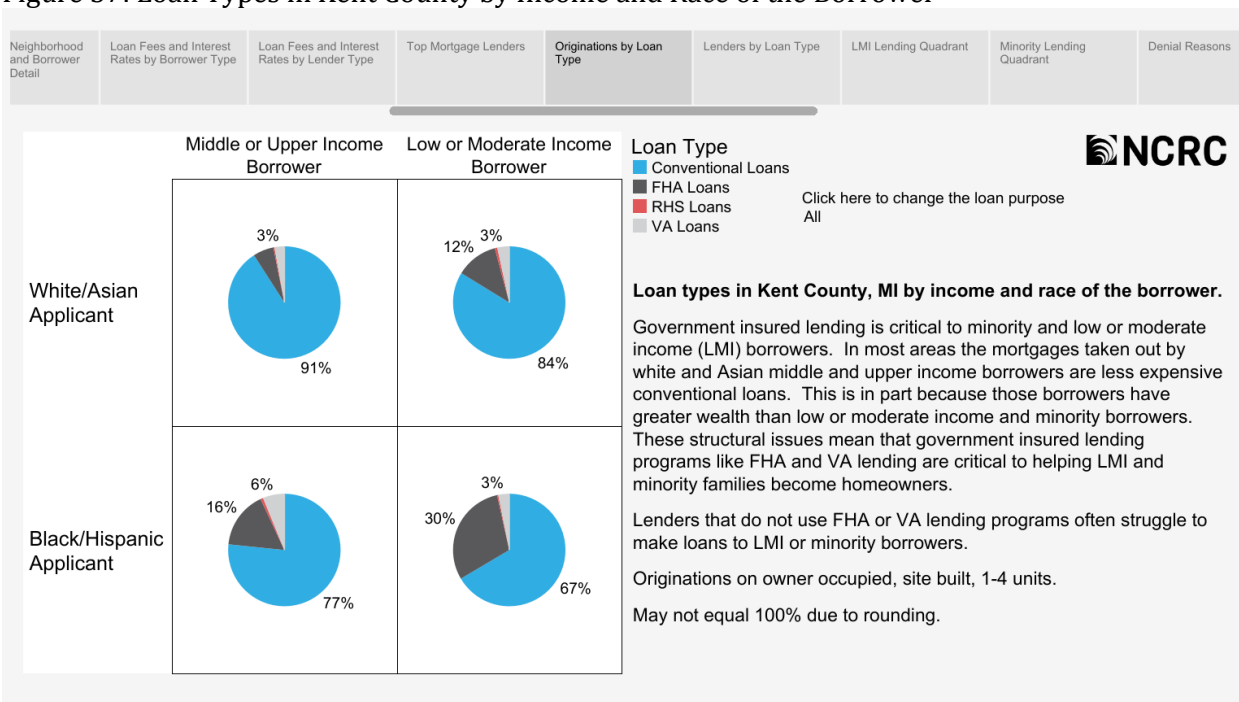
The **Rural Housing Service (RHS)** offers mortgage programs that can help low- to moderate-income rural residents’ purchase, construct, and repair homes. The RHS both lends directly to qualified borrowers and guarantees loans that meet RHS program requirements made by approved lenders. The RHS is part of the U.S. Department of Agriculture (USDA).

The Department of **Veterans Affairs (VA)** offers loan programs to help servicemembers, veterans, and their families buy homes. The VA does not make loans, but sets the rules for who may qualify, arranges the terms under which mortgages may be offered, and guarantees any loan made under the program. Some VA loans are available with no down payment.<sup>xxx</sup>

Conventional loans are less expensive and less accessible to LMI and minority borrowers. FHA and VA lending are critical to homeownership in minority and LMI neighborhoods.

Figure 37 shows loan types by income and race of borrower.

Figure 37: Loan Types in Kent County by Income and Race of the Borrower



Source: NCRC Kent County Fair Lending Report

### Housing Conditions

In 1978, the federal government banned consumer use of lead paint. Elevated lead levels are associated with impaired brain and nerve functioning, slowed development in children, behavior problems, and academic underachievement. Residents in low-income areas may also struggle more with the cost of upkeep of older housing stock, leaving them especially vulnerable to the health impacts of poor housing quality.<sup>xxxii</sup>

A significant number of properties in Grand Rapids are potentially impacted by lead. According to the 2014-2018 5-Year Census data, 80.72% of all housing units were built before 1979, of which

37.3% were built in 1939 or earlier in Grand Rapids. This is according to the national City Health Dashboard.<sup>xxxii</sup>

The City operates a Lead Hazard Control program. The purpose of the program is to make rental- and owner-occupied homes safe from lead and paint hazards. Since September 2003, the City received eight competitive grants from HUD's Office of Healthy Homes and Lead Hazard Control totaling approximately \$23,000,000. During this time, the program made more than 1,700 homes lead safe. The most recent grant commits to an additional 140 homes to be made lead safe and an additional 1,200 individuals to be trained in lead-safe cleaning and work practices. As a recipient of these grants, the City is required to maintain a plan to eliminate childhood lead poisoning. The City continues to be an active member of the Get the Lead Out (GTLO) Collaborative, a multi-agency collaborative that seeks to end childhood lead poisoning in Kent County.

In Kent County, according to 2014-2018 ACS Five-Year Census data, 58.67% of all units were built before 1979 of which 16.83% were built in 1939 or earlier. Equivalent lead risk data was not available through the national County Health Rankings. In 2016, the Kent County Board of Commissioners formed a lead taskforce with the responsibility to:

- Identify the contributing environmental factors of lead-based exposure and illness in Kent County.
- Investigate possible interventions (actions, policies, and programs designed to reduce lead-based exposure and illness).
- Make a formal report and recommendations to the community.

The task force came up with the following three recommendations:

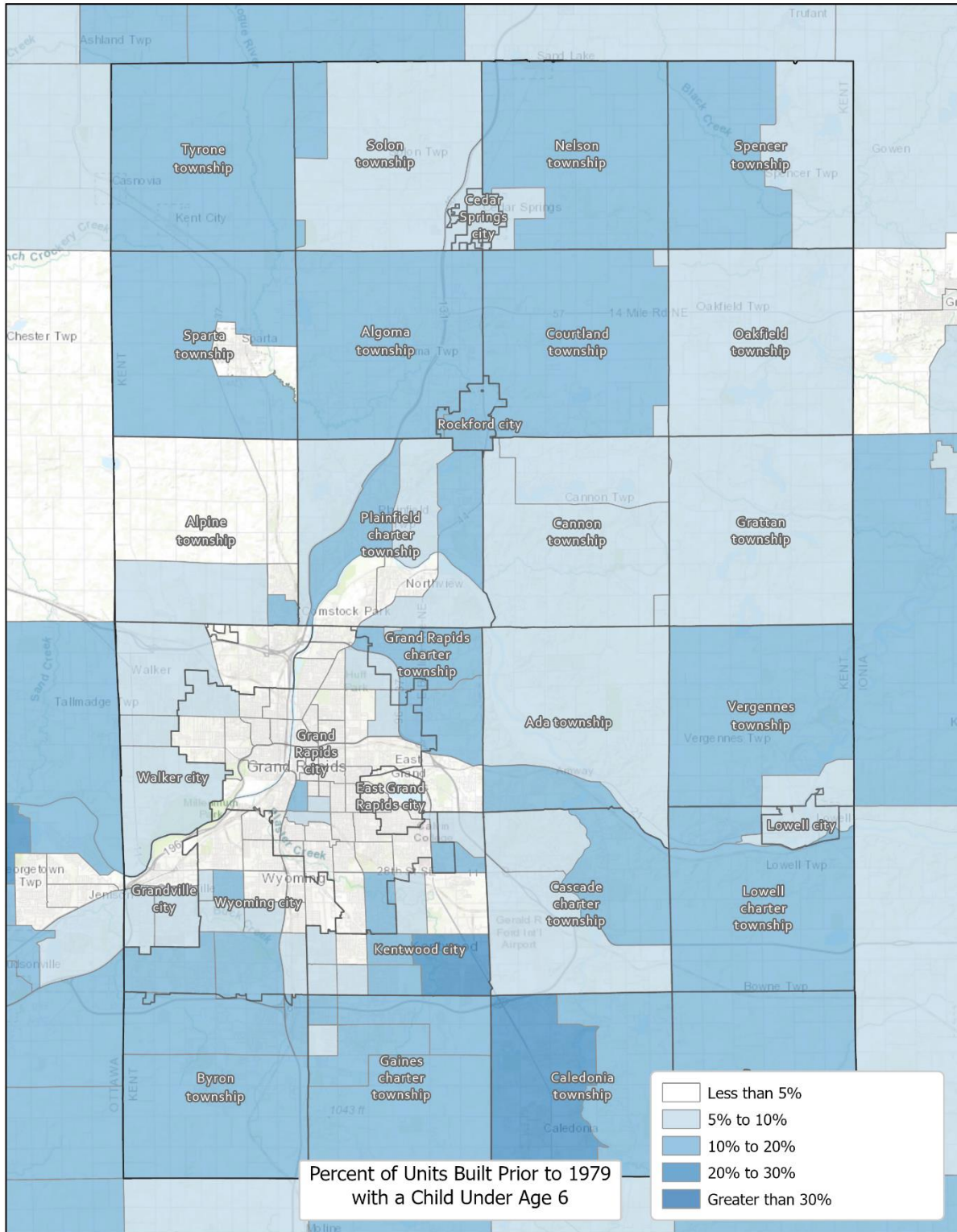
- Charge the Kent County Community Health Advisory Committee (CHAC) to work with stakeholders to develop plans by September 30, 2018, for how the community can work toward fulfilling this report's recommendations.
- Charge CHAC to review elevated blood lead levels (EBL), monitor progress on this report's recommendations, and update the community at least once a year.
- Encourage State of Michigan officials to implement the recommendations of the Governor's Child Lead Poisoning Elimination Board in its November 2016 report, A Roadmap to Eliminating Child Lead Exposure.

In addition to these recommendations, the task force developed an action plan for public education, policy, risk identification and elimination, and health care.<sup>xxxiii</sup> The recommendations are being implemented by the Lead Action Team created in February 2020.

Figure 38 provides a map of households with children under the age of six living in properties built prior to 1979.



Figure 38: Kent County Percent of Units Built Prior to 1979 with Child Under 6



Source: 2013-2017 CHAS

### Other Severe Housing Problems

The primary purpose of the Comprehensive Housing Affordability Strategy (CHAS) data is to demonstrate the number of households in need of housing assistance. This is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30, 50, and 80% of median income). It is also important to consider the prevalence of housing problems among different types of households, such as the elderly, disabled, minorities, and different household types. The CHAS data provides counts of the numbers of households that fit these HUD-specified characteristics in HUD-specified geographic areas.

In addition to estimating low-income housing needs, the CHAS data contributes to a more comprehensive market analysis by documenting issues like lead paint risks, "affordability mismatch," and the interaction of affordability with variables like age of homes, number of bedrooms, and type of building.

There are four housing problems in the CHAS data:

- Housing unit lacks complete kitchen facilities
- Housing unit lacks complete plumbing facilities
- Household is overcrowded, and
- Household is cost burdened.

A household is said to have a housing problem if they have any one or more of these four problems. Figure 39 and Figure 40 show where severe housing problems are in Grand Rapids and Kent County. Problems are primarily located in Grand Rapids and/or around R/ECAP and surrounding areas.<sup>xxxiv</sup>





### Publicly Supported Housing

There are two broad categories of publicly supported housing: HUD assisted or supported housing; and non-HUD assisted affordable housing. Non-assisted affordable housing is comprised of units that are income restricted or publicly subsidized but do not receive assistance through a HUD-sponsored program. Based on data from the HUD Office of Policy Development and Research, there are approximately 10,481 HUD subsidized units in Kent County. The breakdown of units, roughly by public housing authority jurisdiction, is found in Table 51.

Table 51: HUD Subsidized Units in Kent County

	202 (Seniors)	811 (Disabled)	Housing Choice Vouchers	Mod Rehab	Project Based Section 8	Public Housing	Grand Total
Grand Rapids	37	21	4,619	127	1,622	230	6,656
Rockford			22		192	52	266
Wyoming		1	858		190	195	1,244
Balance of County			1,333	0	982	0	2,315
Grand Total	37	22	6,832	127	2,986	477	10,481

Source: HUD Office of Policy Development and Research

In addition to the HUD subsidized developments, a significant number of affordable housing are created through state and local funding initiatives such as tax-exempt bonds, Low Income Housing Tax Credits (LIHTC), and other HUD sources including Home Investment Partnerships (HOME) Program funds. There are approximately 4,434 non-HUD subsidized affordable units throughout Grand Rapids and 5,140 in Kent County.

Table 52 summarizes a few characteristics of tenants currently residing in subsidized housing in the region. In all developments, at least 95% of the tenants are very low-income, most earning less than 25% of the Area Median Income. In Grand Rapids, 50% of Housing Choice Voucher residents are female head of household, 77% are minority and 8% are Hispanic.

Table 52: Selected Tenant Characteristics of HUD Subsidized Units

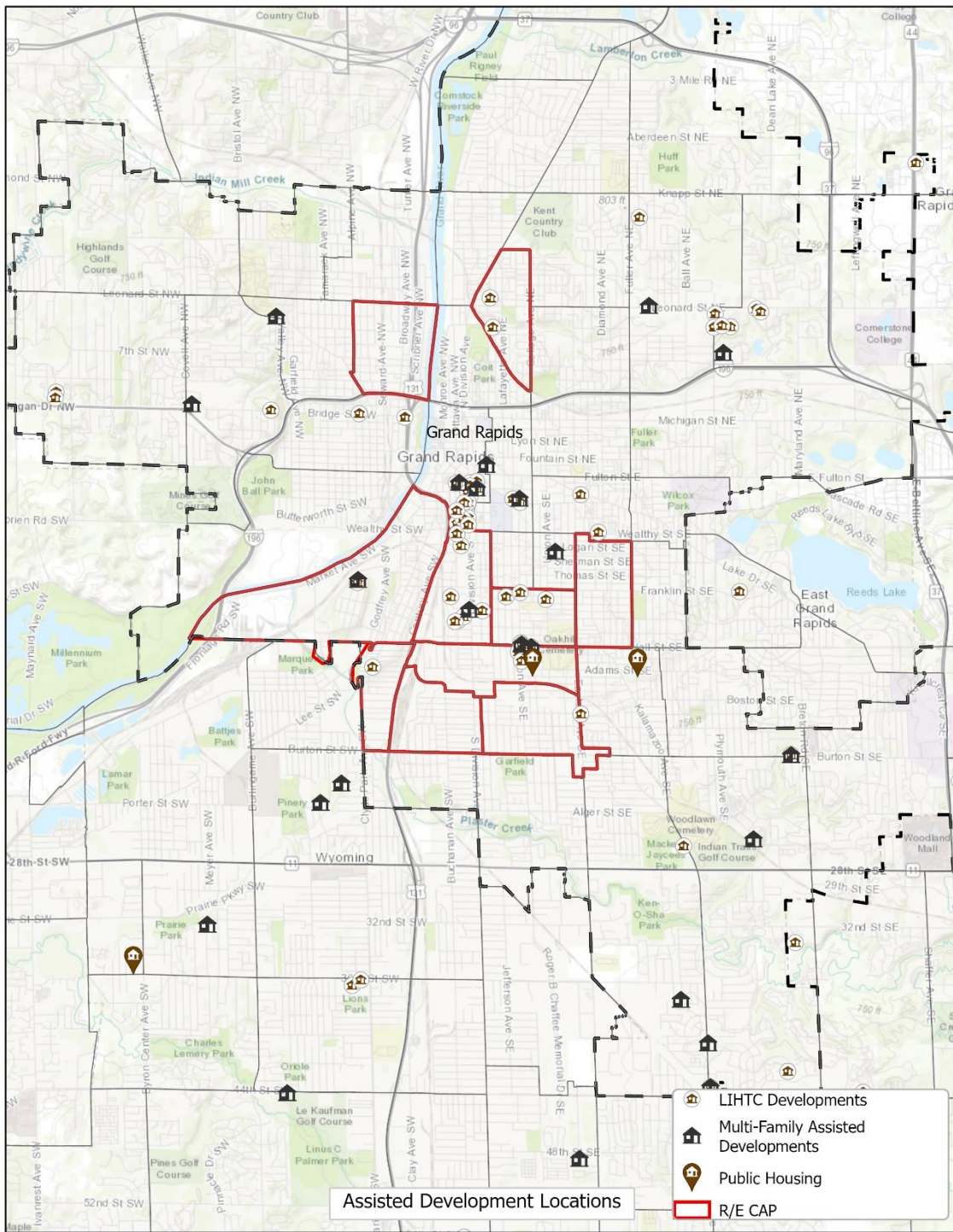
	202 (Senior)	811 (Disabled)	Housing Choice Vouchers	Mod Rehab	Project Based Section 8	Public Housing
<b>Grand Rapids</b>						
% Area Median Income	21%	23%	22%	15%	23%	19%
% very low income	100%	95%	96%	99%	97%	98%
% female head with children			50%	8%	19%	5%
% with disability	3%	91%	24%	71%	19%	75%
% Age 62 or more	100%	14%	18%	23%	52%	22%
% Minority	77%	33%	77%	37%	54%	63%
% Hispanic	34%		8%	8%	10%	7%
<b>Rockford</b>						
% Area Median Income			22%		26%	29%
% very low income			100%		95%	98%
% female head with children			44%		35%	
% with disability			36%		12%	51%
% Age 62 or more			6%		40%	69%
% Minority			25%		6%	2%
% Hispanic					2%	
<b>Wyoming</b>						
% Area Median Income			23%		23%	25%
% very low income			96%		98%	90%
% female head with children			43%		10%	47%
% with disability			31%		35%	30%
% Age 62 or more			21%		55%	20%
% Minority			74%		40%	71%
% Hispanic			15%		27%	19%

Source: HUD Office of Policy Development and Research

A future challenge for affordable housing options is the risk of subsidized units being taken out of inventory. By 2025, there will be 955 subsidized units at risk of being lost from the affordable housing inventory due to expiring Section 8 contracts. This includes 245 units dedicated to seniors and those residents with disabilities. The remaining units are targeted to families.

Figure 41 shows the distribution of LIHTC developments, multi-family assisted developments, and public housing in Grand Rapids and Figure 42 for Kent County. While there are developments located throughout the county, there is a higher concentration in Grand Rapids.

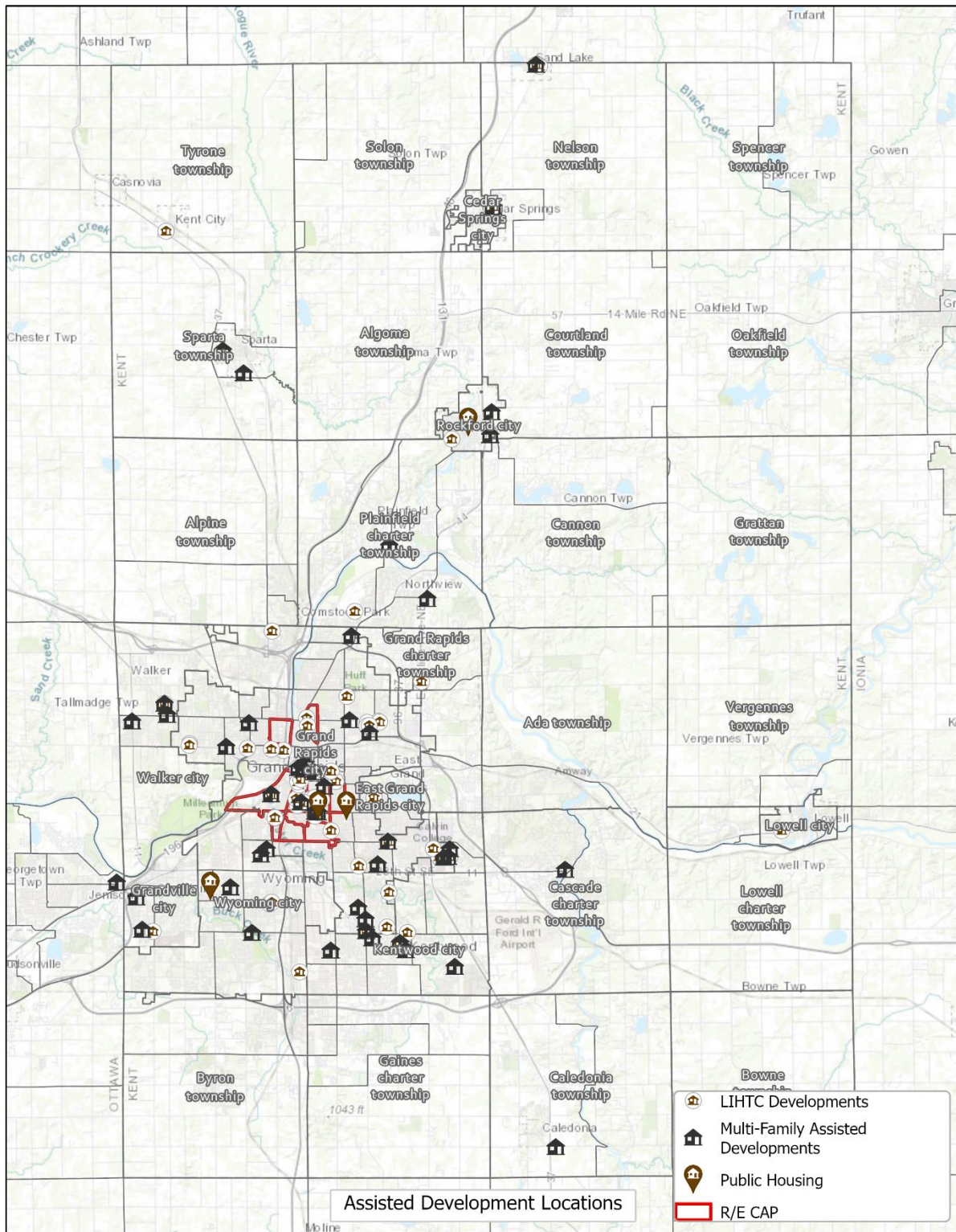
Figure 41: Grand Rapids Publicly Assisted Housing Developments



Source: HUD e-GIS Storefront



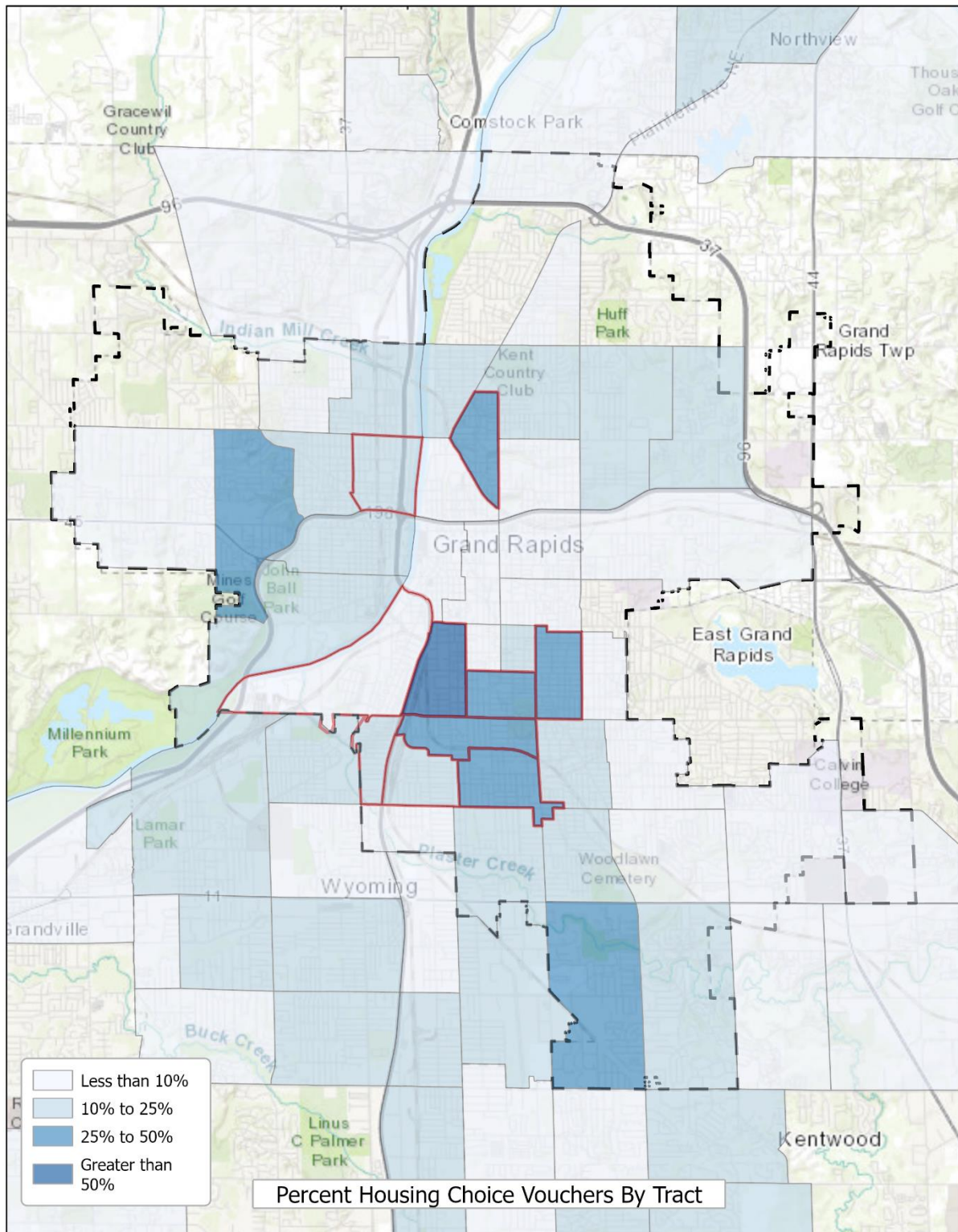
Figure 42: Kent County Publicly Assisted Housing Developments



Source: HUD e-GIS Storefront

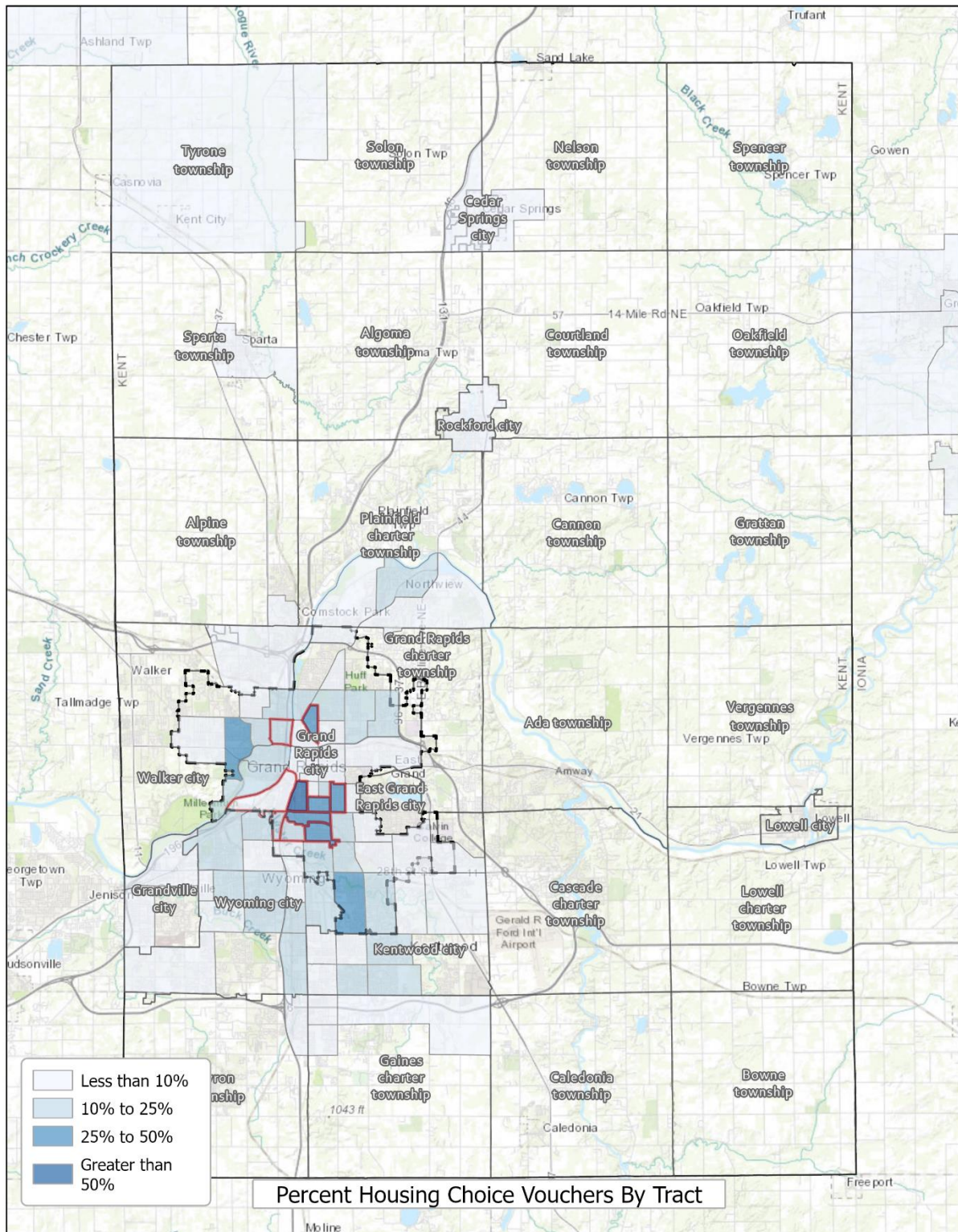
Figure 43 and Figure 44 show the concentration of Housing Choice Vouchers in Grand Rapids and Kent County. Most vouchers are located in R/ECAP areas with the exception of Census Tracts 17 and 46. HCVs allow families to move to high opportunity areas to improve living and economic conditions. In Patrick Sharkey's book *Stuck in Place*, he explores the impact of place on social and economic mobility. He examines ethnographic research, reinforced by numerous studies, which indicate even if Blacks, or any disadvantaged group, are able to improve their social and economic status in one generation, if the group remains in a social environment that is disadvantaged across multiple dimensions, it makes it difficult to pass on progress to the next generation.

Figure 43: Grand Rapids Percent of Households with Housing Choice Vouchers by Tract



Source: HUD e-GIS Storefront

Figure 44: Kent County Percent of Households with Housing Choice Vouchers by Tract



Source: HUD e-GIS Storefront

## Other Relevant Data

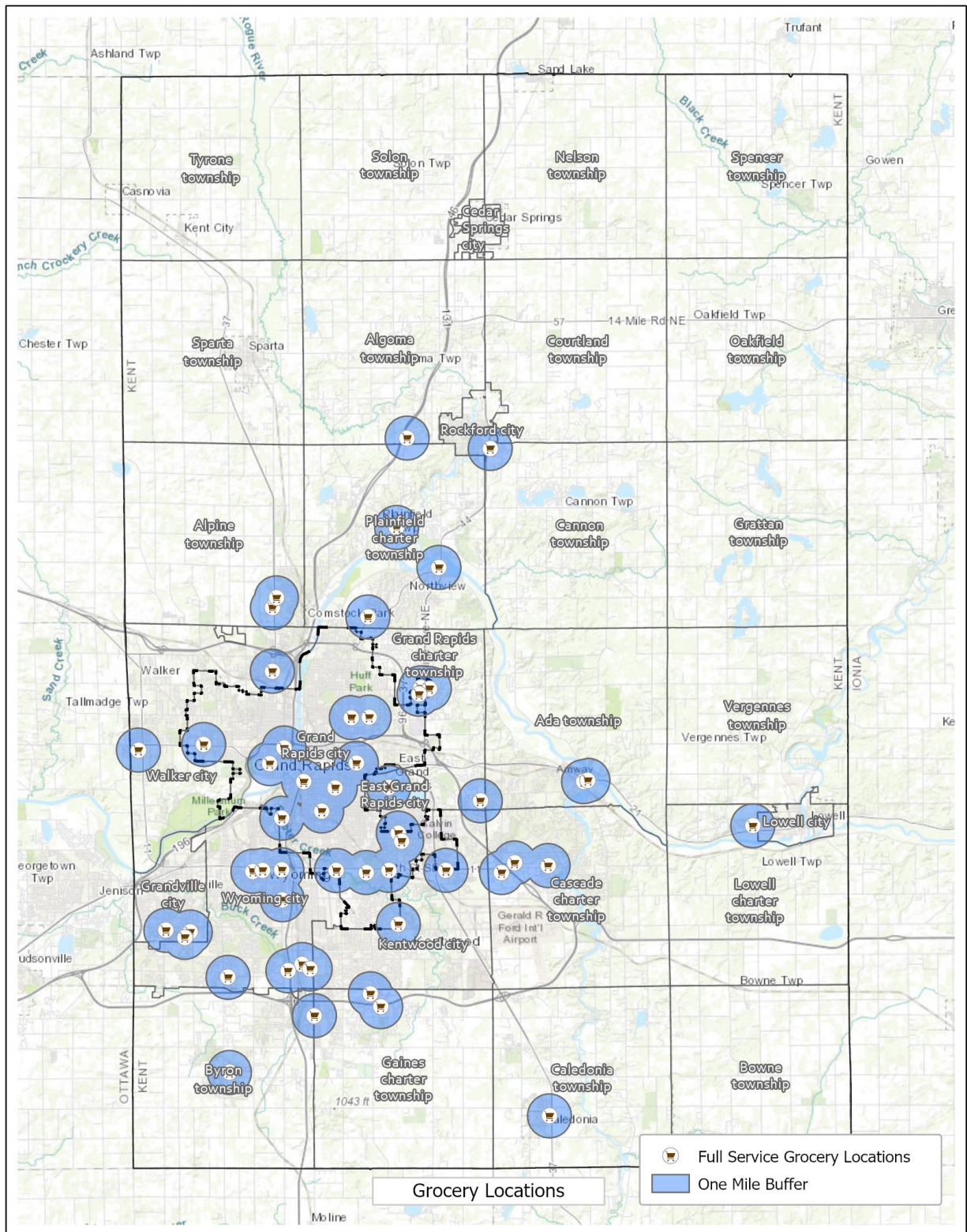
In addition to a lack of quality housing and access to jobs, communities with high levels of poverty often lack amenities such as quality schools, day care centers, and recreational centers. Instead, these areas are often identified by violence, stress, and environmental hazards. There is also often a lack of positive peer influence for children in these areas. Data shows that children in areas of concentrated poverty do not perform as well as their peers in high opportunity neighborhoods, experience higher dropout rates, and are less likely to attend college increasing the likelihood for generational poverty.<sup>xxxv</sup>

## Grocery/Fresh Food

Those who live in environments with limited access to healthy foods, generally from supermarkets, and a high number of fast-food restaurants have a higher risk of developing diabetes and obesity. The national City Health Dashboard indicates that 60% of Grand Rapids' residents had limited access to healthy food. The metric considers the population living more than ½ mile from the nearest supermarket, supercenter, or large grocery store. Supermarket, supercenters, or large grocery stores are defined as establishments that report at least \$2 million in annual sales and contain the same major food departments found in a traditional supermarket, including fresh produce, fresh meat and poultry, dairy, dry and packaged foods, and frozen foods. <sup>xxxvi</sup>

The national County Health Rankings measure of food insecurity accounts for both proximity to healthy foods and income. The measure includes access to healthy foods by considering the distance an individual lives from a grocery store or supermarket, locations for healthy food purchases in most communities, and the inability to access healthy food because of cost barriers. Kent County's food index is an 8.1 on a scale of 0 to 10 with 0 being the worst. <sup>xxxvii</sup> Figure 45 shows access to healthy foods throughout the county.

Figure 45: Grocery and Supermarket Locations



Source: ESRI Business Analyst

Schools

Figure 46 compares graduation rates between 2008 and 2019 for the state by race and ethnicity.<sup>xxxviii</sup>

Figure 46: Michigan On-Time Graduation Rate by Race/Ethnicity

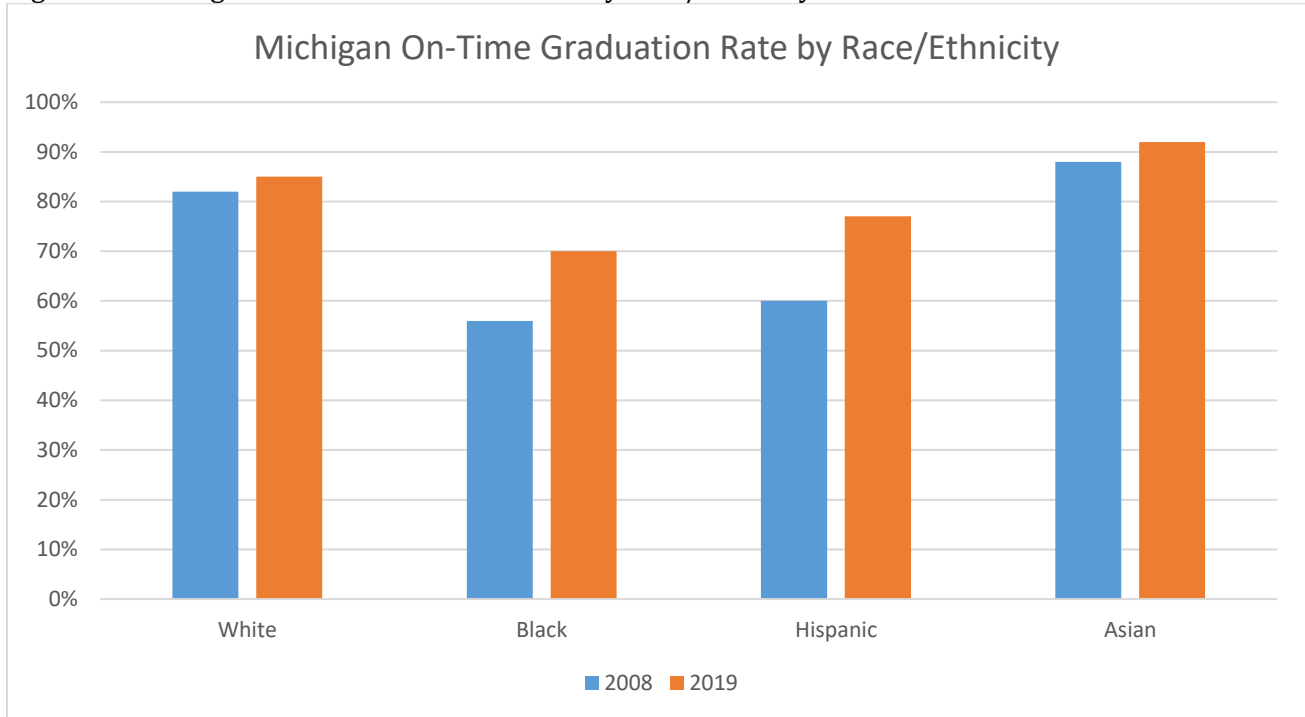


Table 53 provides an average of the graduation rates for 2019 compared to 2018.

Table 53: 2019 Grand Rapids and Kent County School Graduation Rates

	2019 Number of Students	2019 Graduation Rate	2019 Drop Out Rate	2019 Didn't Graduate Other	2018 Graduation Rate	2018 Drop Out Rate
Grand Rapids High Schools	915	68.38%	7.08%	9.77%	67.75%	6.78%
Kent County High Schools	1,612	77.62%	8.85%	7.15%	76.96%	8.34%

### Computer/Internet

Access to a computer and internet access does not only impact a child’s ability to participate in virtual learning, but also impacts a person’s ability to work from home. In 2019, 8.6% of households in Grand Rapids had no computer and 15.5% were without an internet subscription. In Kent County, 6.1% of households had no computer and 11.4% were without an internet subscription. Table 54 shows families with no internet access based on income.

Table 54: No Internet Access Based on Income

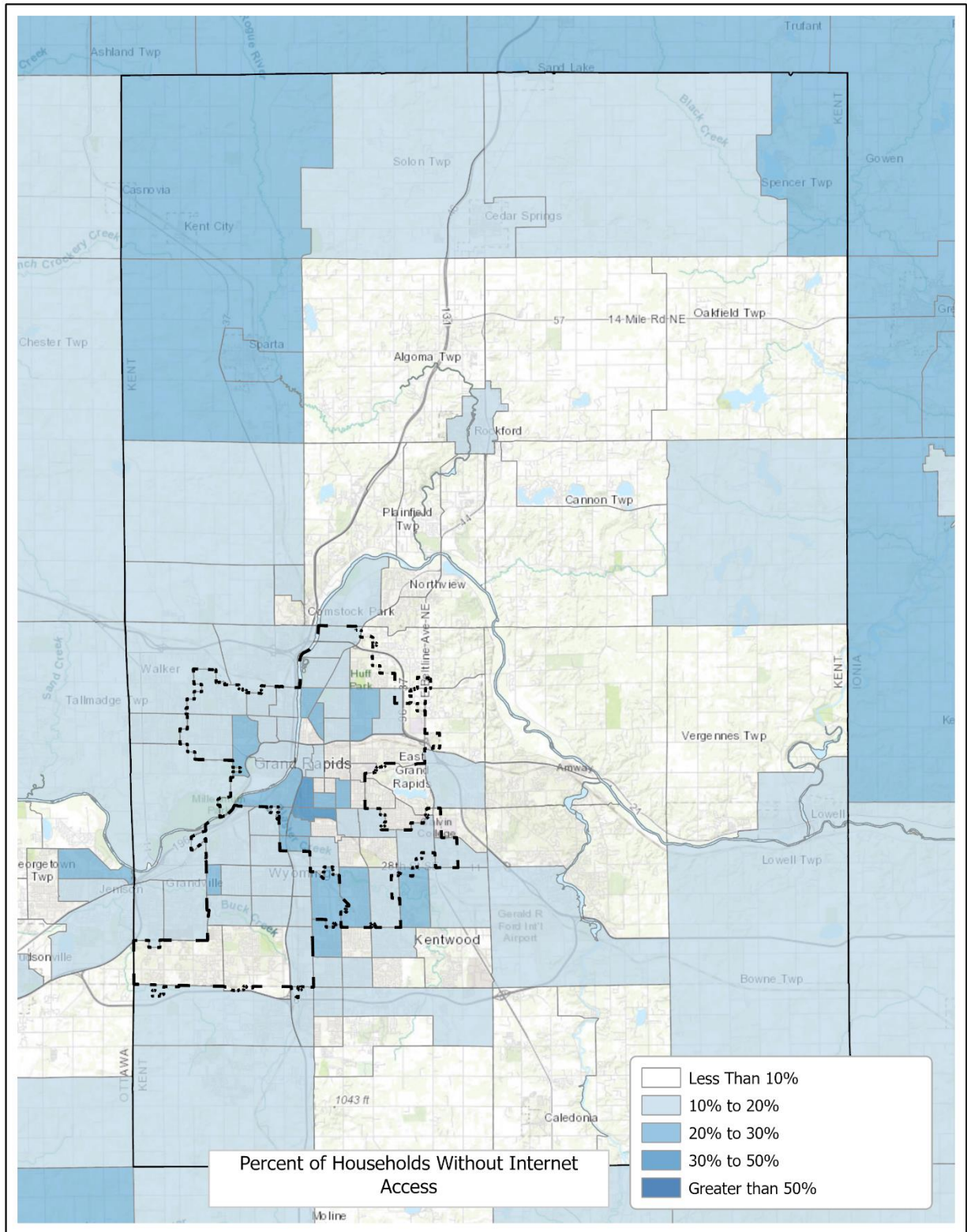
Income	Grand Rapids	Kent County
Less than \$20,000	42%	35.7%
\$20,000 - \$75,000	12.3%	13.2%
\$75,000 and up	4.2%	3.3%

Source: 2019 ACS 1-Year Estimates

The COVID-19 pandemic has clearly shown that high-speed internet is necessary as many children were forced into distance learning situations due to closed schools. Classes were held virtually, with many using streaming video technology. Platforms like Zoom and WebEx need high-speed internet to function well. Figure 47 illustrates the percentage of households without internet connections. Lack of internet access will continue to exacerbate the wealth gap between neighborhoods, especially as remote learning and work from home become more the norm, and not the exception. Recent data also reveals that students are struggling in a virtual learning environment which will have long-term economic implications.



Figure 47: Percent of Households without Internet Connection



Source: 2013-2017 ACS

### Public Safety

Violent crime is a public health and criminal justice issue. Among young adult Black and Hispanic males, violence is the leading cause of death. Victims of violence are at an increased risk of mental health issues, sexual health conditions, injury, and death. High crime rates also deter businesses from locating in neighborhoods, are a source of community stress, and can lead community members to spend more time in the house due to safety concerns. Part I violent “person” offenses include murder, aggravated assault, robbery, and forcible rape. Part II offenses include less violent but still serious crimes, such a non-aggravated assault, weapons, narcotics, driving while intoxicated, prostitution, sex crimes, stolen property, fraud, embezzlement, and other crimes.

Grand Rapids had a total of 45 homicides between 2015 – 2019 of which 84% were firearm related. 78% of the victims were male and 62% were Black. Kent County had a total of 13 homicides of which 37% were related to firearms. 58% of the victims were female and 89% were White.

Table 55: 2015 – 2019 Homicides

2015 - 2019 Homicides	Grand Rapids	Kent County
Handguns	38	1
Other Weapons	7	12
Total Homicides	45	13

Source: FBI Crime Data Explorer

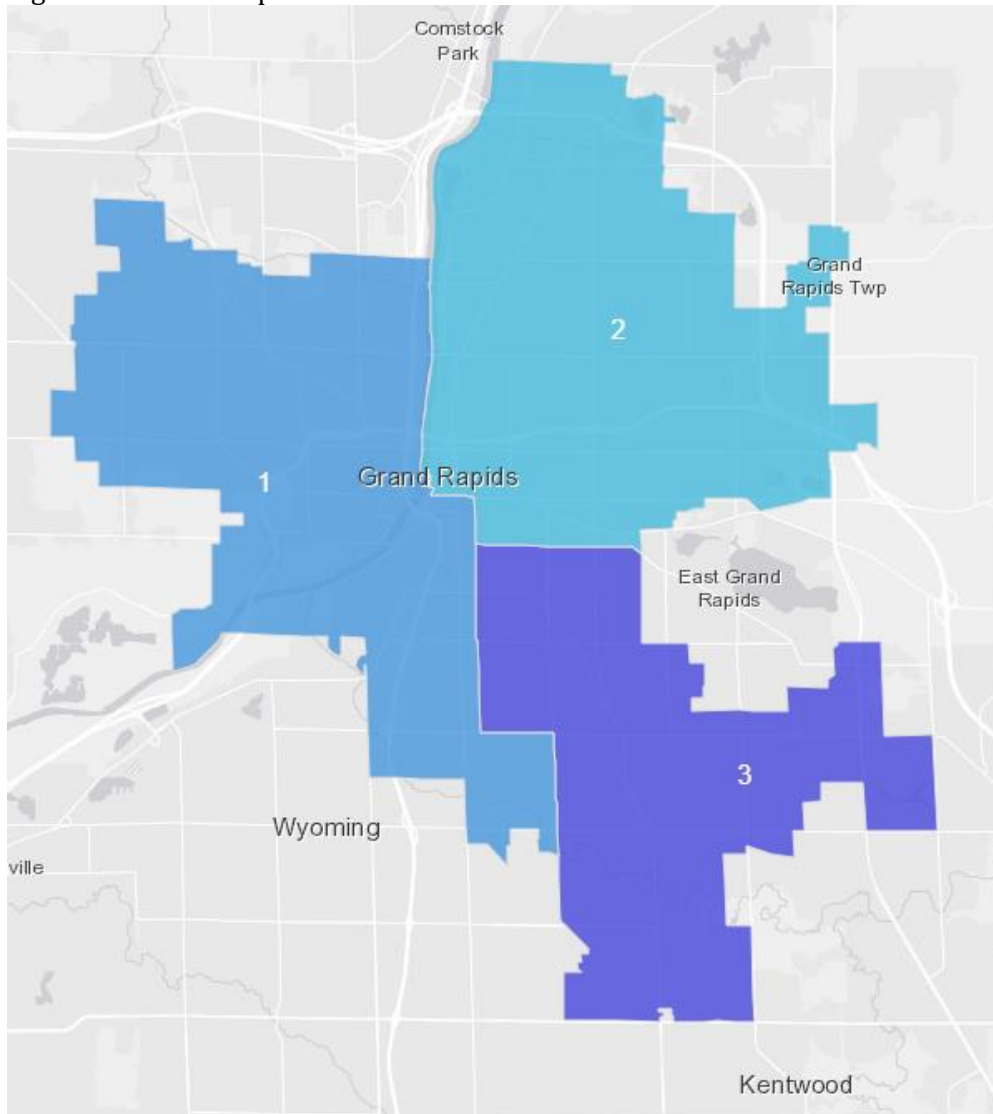
Table 56 shows 2015-2019 Part 1 Violent Crime in Grand Rapids. Except for 2017, there was a steady decline overall. However, beginning in 2019 homicide began to increase. Table 55 shows that firearm related homicides were the leading cause of homicides from 2015-2019. In 2020, Grand Rapids had 35 firearm related homicides representing a 337% increase in homicides from 2019 to 2020. The increase in gun violence is not unique to Grand Rapids as many urban areas experienced an increase related to the pandemic.

Table 56: Grand Rapids – Part 1 Violent Crime

Grand Rapids - Part 1 Violent Crimes					
Violent Crime Incidents	2019	2018	2017	2016	2015
Homicide	8	5	12	10	10
Rape	137	149	150	144	130
Robbery	274	319	351	321	423
Aggravated Assault	754	848	904	854	859
Total Part 1	1,173	1,321	1,417	1,329	1,422
% Decline	-11%	-7%	7%	-7%	

Source: FBI Crime Data Explorer

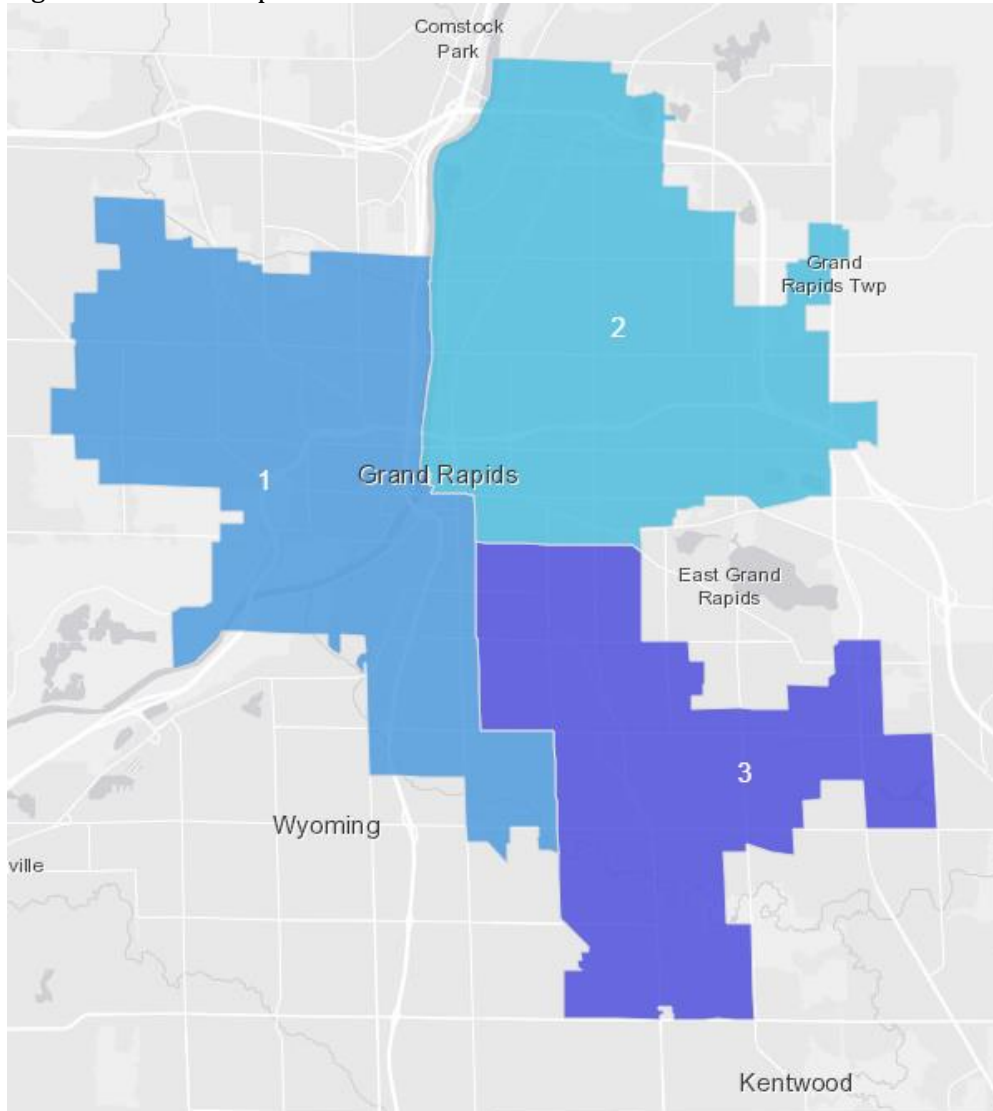
The Grand Rapids' data dashboard indicates that Ward 1 is experiencing the highest number of Part 1 (634) and Part II (1,205) crime followed by Ward 2 (418 and 695), and Ward 3 (357 and 654).  
Figure 48: Grand Rapids Wards



Source: City of Grand Rapids website February 2018

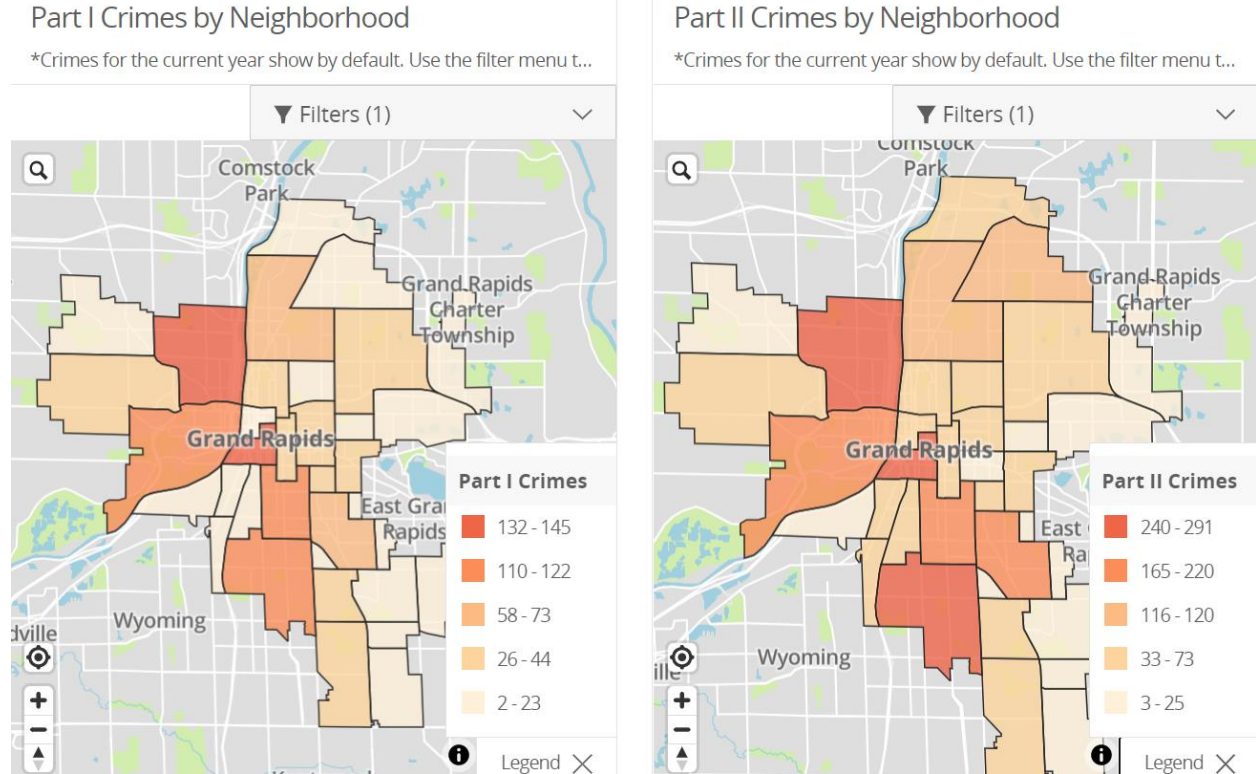
Figure 49 shows the neighborhoods that are experiencing the highest number of Part 1 and Part 2 crimes.

Figure 48: Grand Rapids Wards



Source: City of Grand Rapids website February 2018

Figure 49: 2020 Grand Rapids Crimes by Neighborhood



Source: Grand Rapids Police Department Data Dashboard through July 2020

Table 57 shows 2015-2019 Part 1 Violent Crime in Kent County. Except for 2018, there was a steady decline. In 2018, there was a significant increase in Rape crimes. Table 55 shows that other weapons were used in most of these crimes.

Table 57: Kent County – Part 1 Violent Crime

Kent County - Part 1 Violent Crimes					
Incident Type	2019	2018	2017	2016	2015
Homicide	2	7	4	2	0
Rape	123	153	110	103	122
Robbery	30	43	38	37	41
Aggravated Assault	184	177	170	191	156
Total Part 1	339	380	322	333	319
% Decline	-11%	18%	-3%	4%	

Source: FBI Crime Data Explorer

### Recreation

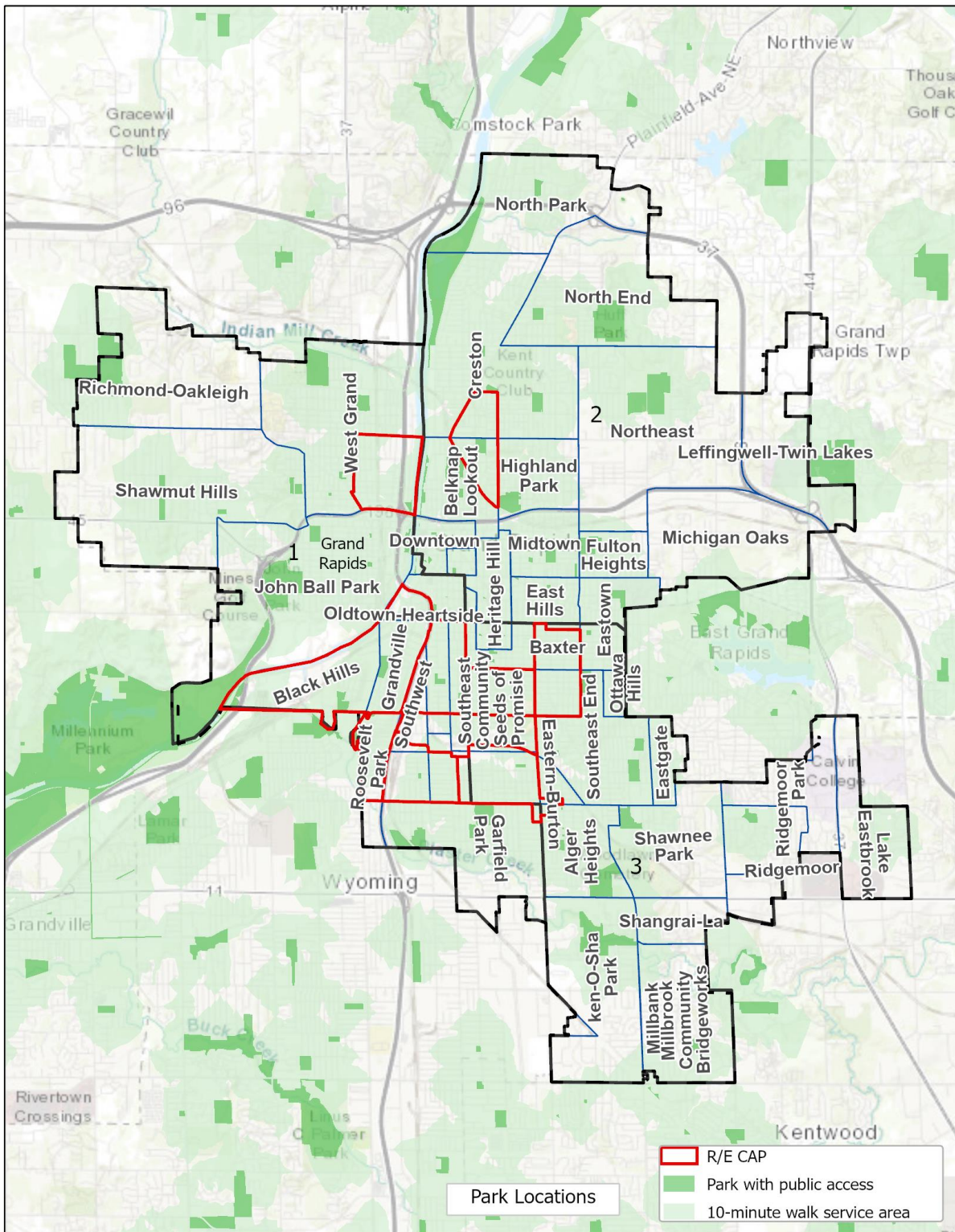
Access to parks has been associated with better mental and physical health, lower death rates, and improved social connection. Research has shown that green space may increase physical activity, reduce stress, improve quality of life, and better mental health across different groups of people.<sup>xxxix</sup>

Grand Rapids has more than 1,600 acres of parkland at 74 locations throughout the city of which 1,643 acres are accessible. Altogether, the city manages over 2,000 acres of parks, undeveloped land, natural areas, cemeteries, and a golf course. An additional 244 acres are joint park-school sites. Approximately, 77% of residents live within a 10-minute walk of a park.<sup>xi</sup> The national City Health Dashboard indicates that 80.7% of Blacks, 87.4% of Hispanics, and 71.7% of Whites had park access.<sup>xii</sup> Figure shows park access for Grand Rapids' residents.

In Grand Rapids, bicycling facilities are typically installed or upgraded during street reconstruction and resurfacing projects following the guidelines and recommendations of the City's Vital Streets Plan, Vital Streets Design Guidelines, and the Bicycle Action Plan. As of December 2019, there were almost 103 miles of bicycle facilities within the city including several types of bicycle lanes (standard, advisory and buffered), signed bike routes, separated bikeways, and off-street multi-use trails. The Grand Valley Metro Council tracks the region's transportation networks and currently shows there are approximately 370 miles of bicycling facilities within the city and surrounding communities.<sup>xlii</sup>

The Kent County Parks system includes 42 parks, greenspaces, and regional trails totaling 7,354 acres. The system has four regional connector trails and additional trails that span over 100 miles. A 2018 public survey completed for the 2019-2023 master plan found nine out of ten randomly selected households had visited a Kent County park or trail within the past year. Among this, a majority of residents are constituents who only interact with the County through its provision of recreational services and opportunities.<sup>xliii</sup> Figure shows park access for Kent County residents.

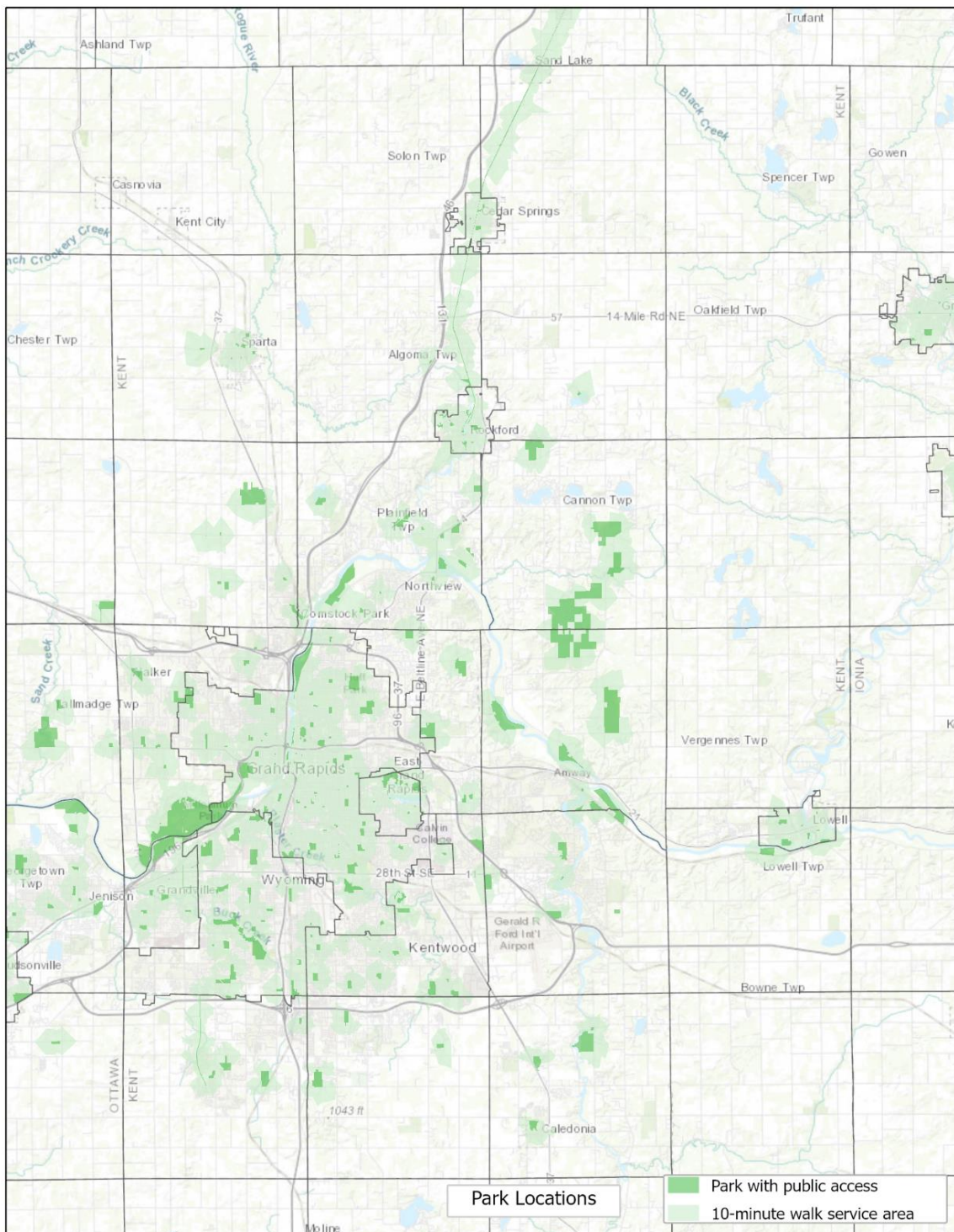
Figure 50: Grand Rapids Access to Parks or Green Space – 10- Minute Walk



Source: Trust for Public Land's Park Service



Figure 51: Kent County Access to Parks or Green Space – 10 - Minute Walk



Source: Trust for Public Land's Park Service

### Infrastructure

The City of Grand Rapids committed to evaluating all capital projects based on strategic priorities, balance and distribution across the Wards, and investment in NOFs. Due to systemic and historic inequities, residents in these geographic areas experience the most disparate outcomes in income, educational attainment and opportunity, homeownership and wealth accumulation compared to other Grand Rapids' census tracts and the city. The City of Grand Rapids strives to eliminate inequities, therefore is intentional to invest in these areas and in systems, practices, and policies that advance justice and equitable outcomes throughout the city.

A large percentage of the City's capital investments fall within Health and Environment, Mobility and Governmental Excellence strategic priorities because all water, wastewater, storm water, parks, LED street lighting, Vital Streets and facilities improvement projects fall within these priorities. Analyzing the City's capital investment by Ward identifies whether investments are being made across the three Wards relatively equally (balance and distribution). When evaluating the Capital Improvement Fund (CIF), a heavier emphasis has been placed on Third Ward investments to address disinvestment in recent history.<sup>xliv</sup>

### Small/Micro-Business Development

According to the 2012 Survey of Business Owners, there are 16,153 firms in Grand Rapids. Table 58 shows the types of firms. Minority firms make up 25.11% of the total, while 2019 ESRI Business Estimates indicate minorities are 44.58% of the total population. Women-owned firms make up 37.73% of total firms, while females are 51% of the population.

Table 58: Grand Rapids Firms

Type	Number
Men-owned	8,224
Women-owned	6,095
Minority-owned	4,056
Nonminority-owned	11,291
Veteran-owned	961
Nonveteran-owned	14,238
<b>Total</b>	<b>16,153</b>

Source: 2012 Survey of Business Owners

There are 52,666 firms in Kent County. Table 59 shows the types of firms. Minority firms make up 14.8% of total firms, while minorities are 26.95% of the total population. Women-owned firms make up 33.58% of total firms, while females are 50.91% of the population.

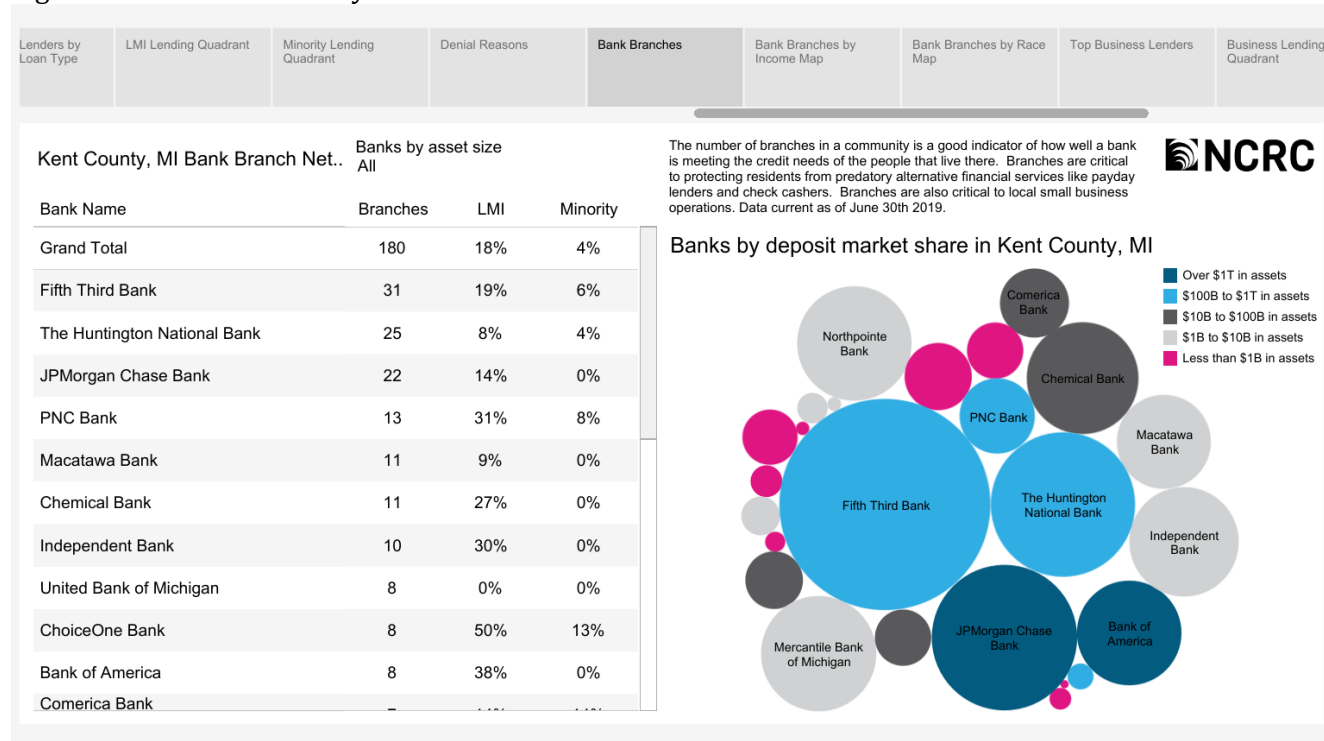
Table 59: Kent County Firms

Type	Number
Men-owned	29,724
Women-owned	17,687
Minority-owned	7,795
Nonminority-owned	43,060
Veteran-owned	4,329
Nonveteran-owned	45,951
Total	52,666

Source: 2012 Survey of Business Owners

The pandemic showed how important banking relationships are to meeting the credit needs of a community. To some extent, a bank’s branch network can be an indicator of how well an institution is meeting those needs. Fifth Third Bank, Huntington Bank, and JP Morgan Chase have the greatest presence in the community both in assets and branch networks.

Figure 52: Bank Presence by Asset Size and Branch Network



Source: 2020 NCRC Kent County Fair Lending Report

Evidence suggests that access to bank credit, particularly for small businesses, declines as the distance between the bank and borrower grows. A 2005 Journal of Finance study found that small business loan rates increased with the distance between firm and bank.<sup>xlv</sup> A 2014 MIT study found that branch closures in low-income and minority neighborhoods made it more difficult for local businesses to secure small business funding. The study revealed that the number of new small business loans is 13% lower for several years after a closing and that even in crowded markets, closings can have large effects on local credit supply with loan originations being depressed for up

to six years. The study further shows that the impact is hyper-local, within a six-mile radius of the branch closure. <sup>xlvi</sup>

Table 60 provides a list of the total branches the identified bank has in Kent County. As shown in the figure below, branch presence for all banks in LMI communities is 18% and 4% in minority communities. This is an indication of the limited access to credit and other financial services in these neighborhoods.

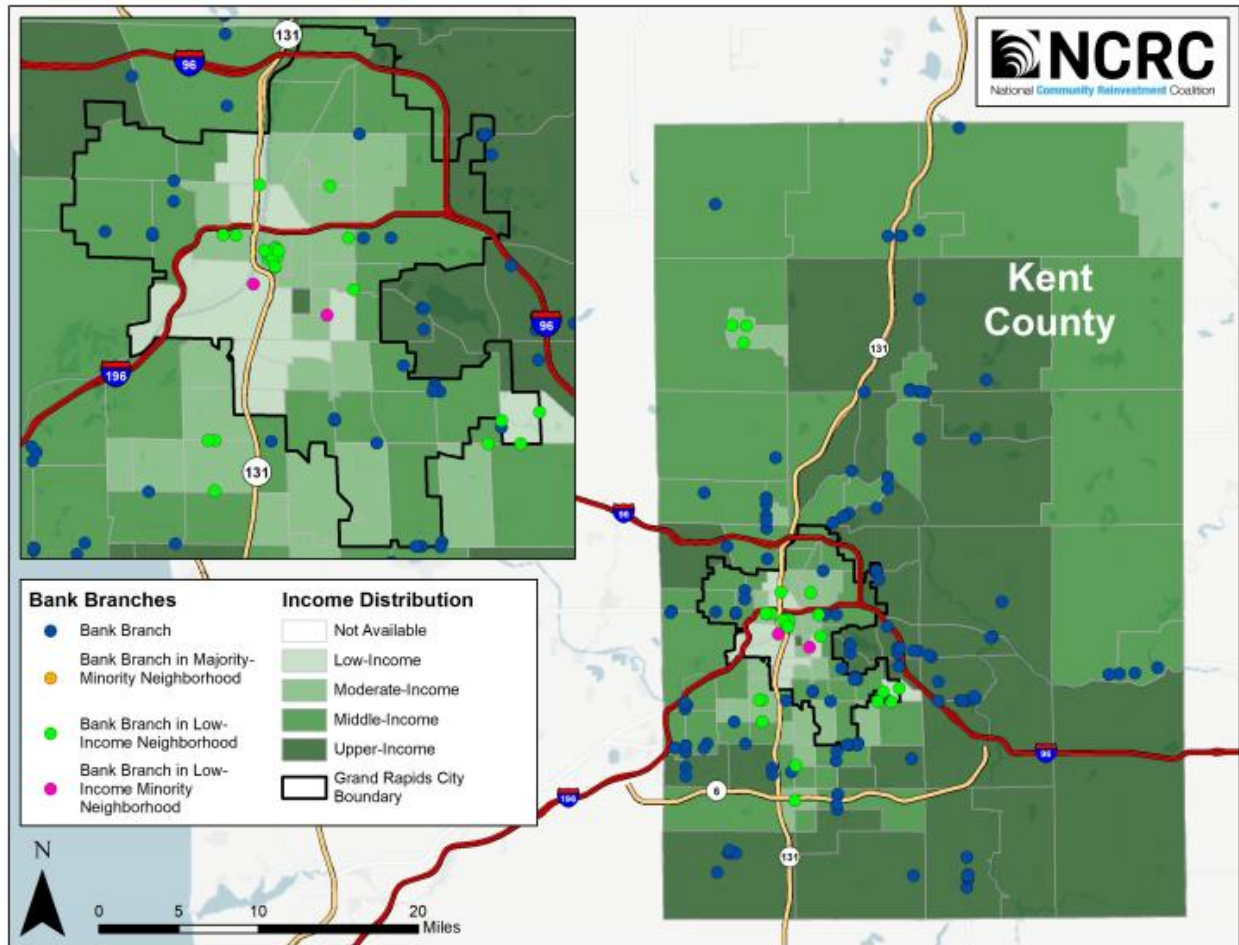
Table 60: Kent County LMI and Minority Bank Branches

Bank Name	Branches	LMI	Minority
Grand Total	180	18%	4%
Fifth Third Bank	31	19%	6%
Huntington National Bank	25	8%	4%
JPMorgan Chase Bank	22	14%	0%
PNC Bank	13	31%	8%
Macatawa Bank	11	9%	0%
Chemical Bank	11	27%	0%
Independent Bank	10	30%	0%
United Bank of Michigan	8	0%	0%
ChoiceOne Bank	8	50%	13%
Bank of America	8	38%	0%
Comerica Bank	7	14%	14%
Flagstar Bank	6	0%	0%
Mercantile Bank of Michigan	5	20%	0%
Old National Bank	4	25%	0%
West Michigan Community Bank	1	0%	0%
Union Bank	1	0%	0%
The Northern Trust Company	1	0%	0%
Northpointe Bank	1	0%	0%
Level One Bank	1	0%	0%
Horizon Bank	1	0%	0%
Highpoint Community Bank	1	0%	0%
Grand River Bank	1	0%	0%
First National Bank of Michigan	1	0%	0%
First National Bank of America	1	100%	100%
First Community Bank	1	0%	0%

Source: 2020 NCRC Kent County Fair Lending Report

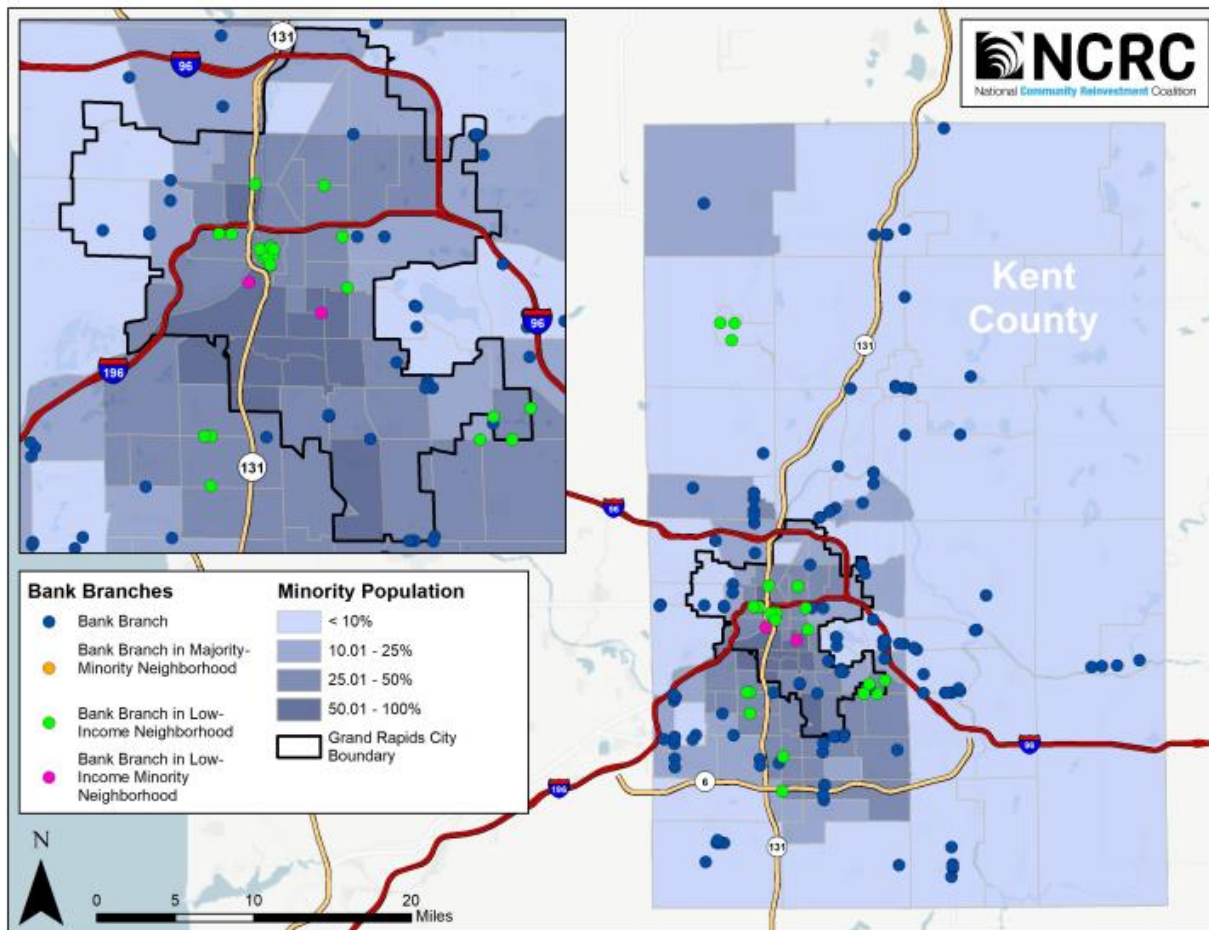
Figure shows the bank branch network by income, while Figure shows the bank branch network based on majority minority neighborhoods. The figures indicate that bank branches are heavily located outside of the city. Branches located inside of the city are primarily in middle to upper income communities. There is some representation in low-income communities. However, when race is factored in access significantly declines.

Figure 53: Bank Branch Locations by Neighborhood Income



Source: NCRC Kent County Fair Lending Report

Figure 54: Bank Branches by Race



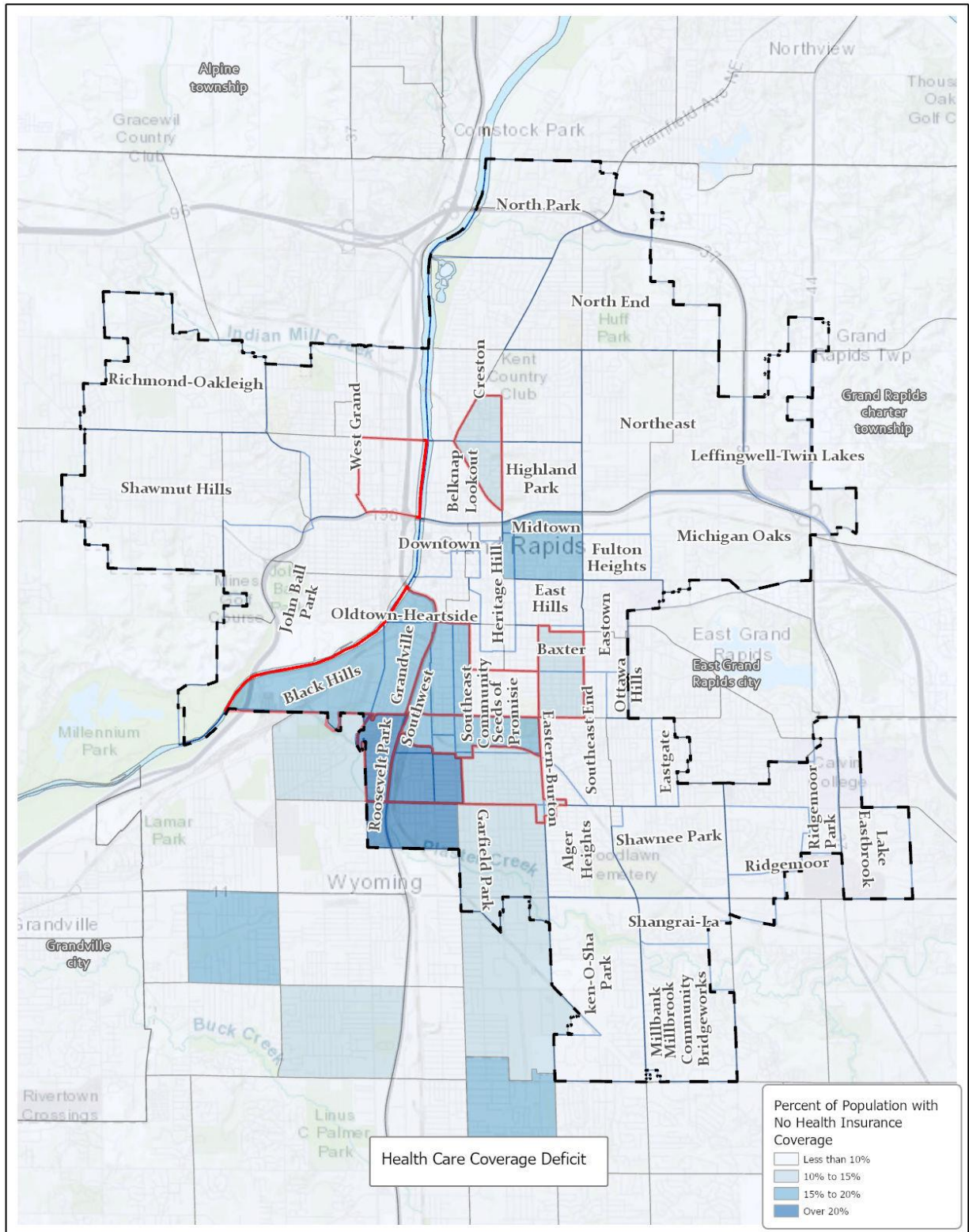
Source: NCRC Kent County Fair Lending Report

### Access to Healthcare

Growing evidence shows that housing stability and location can significantly affect health care costs, access, and outcomes. Research has shown that interventions to help families improve the condition of their housing or move to healthier neighborhoods improve people's health status. Poor-quality housing or housing located in under-invested neighborhoods can worsen health outcomes. Contaminants such as lead paint and mold, unkept or unsanitary living conditions, and deteriorating buildings can lead to childhood or adult asthma, brain injuries or development disabilities, preventable infections, or trips and falls that can result in injury and premature death.<sup>xlvii</sup>

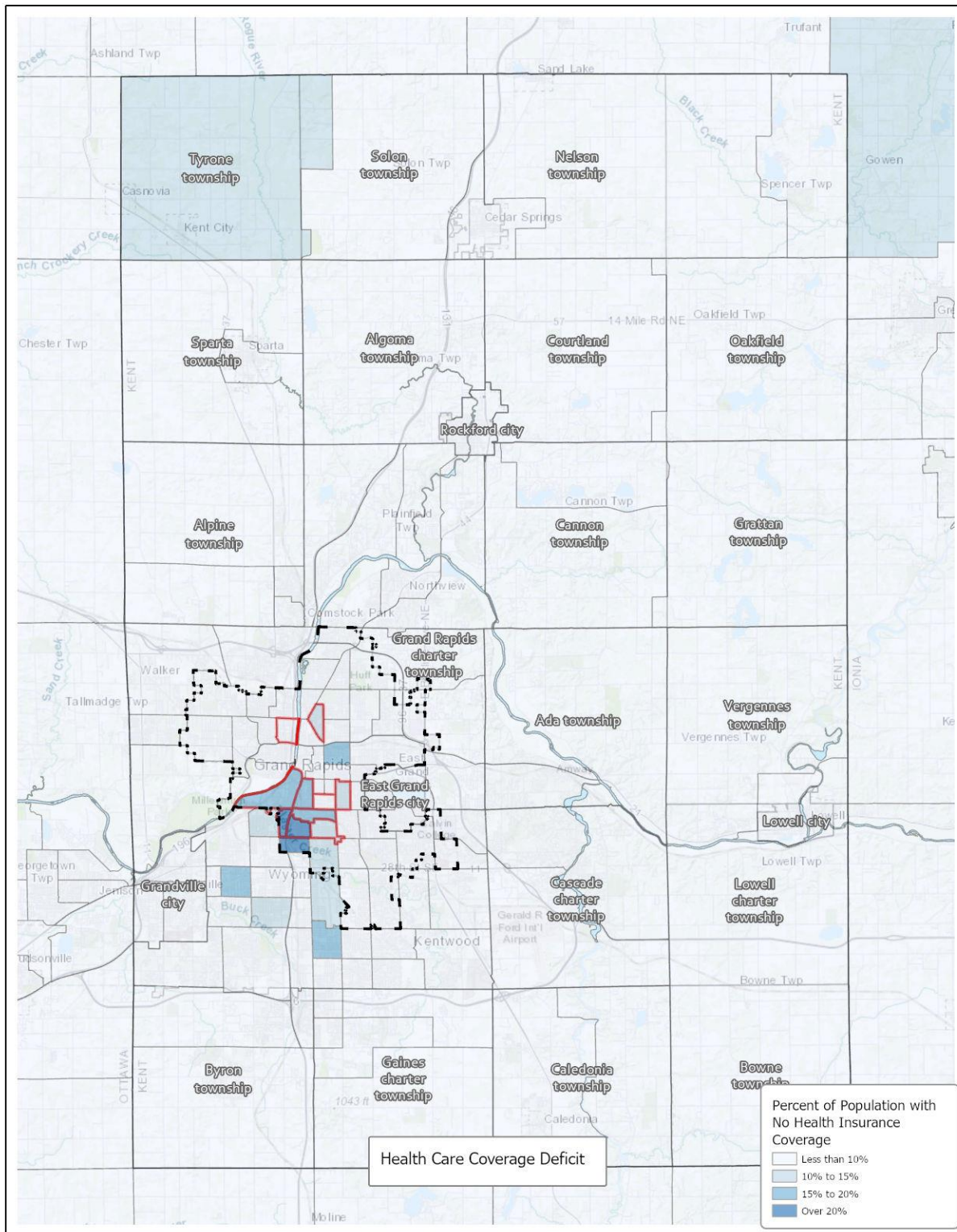
Health insurance coverage is associated with increased labor force participation and higher incomes. Disparities persist in insurance coverage: racial/ethnic minorities and people in lower income brackets are less likely than the general population to be insured. The national City Health Dashboard indicates that 10.2% of Grand Rapids' population under age 65 was uninsured compared to 6% indicated by the national County Health Rankings. The census tracts with the greatest income inequality have the highest percentages of uninsured. Figure indicates that there is a high concentration of uninsured in the R/ECAP areas with neighborhoods of concentrated non-English speaking and immigrant communities.<sup>xlviii</sup>

Figure 55: Grand Rapids Percent Uninsured



Source: 2013-2017 ACS

Figure 56: Percent Uninsured in Kent County



Source: 2013-2017 ACS



### Spectrum Community Health Needs Assessment

Hospitals are required to conduct a community health needs assessment every three years and adopt an implementation strategy to meet the community health needs to maintain their tax-exempt status. To assess the health needs of its community, a hospital facility must identify the significant health needs of the community. It must also prioritize those health needs and identify resources potentially available to address them. Resources can include organizations, facilities, and programs in the community, including those of the hospital facility, potentially available to address those health needs.

The health needs of a community include requisites for the improvement or maintenance of health status, both in the community at large and parts of the community, such as particular neighborhoods or populations experiencing health disparities. Health needs may include, but are not limited to:

- Address financial and other barriers to accessing care,
- Prevent illness,
- Ensure adequate nutrition, or
- Address social, behavioral, and environmental factors that influence health in the community.

Spectrum Health is a not-for-profit health system, based in West Michigan, offering a full continuum of care through the Spectrum Health Hospital Group, which is comprised of 12 hospitals. The 2017 Community Health Needs Assessments (CHNA) provides information for problem and asset identification, as well as for policy and program development, implementation, and evaluation. The following priorities were identified during the most recent assessment:

1. Mental Health
2. Substance Abuse
3. Obesity/Poor Nutrition
4. Social Determinants (access to care, housing, economic security, violence, child trauma)<sup>xlix</sup>

The current hospital implementation plan ends in 2021.<sup>l</sup>

### Impact of COVID-19

Community resilience is the capacity of individuals and households to absorb, endure, and recover from the health, social, and economic impacts of a disaster such as a hurricane or pandemic. To facilitate disaster preparedness, the Census Bureau has developed new small area estimates to identify communities where resources and information may effectively mitigate the impact of disaster. The information is presented at the county level. Variation in individual and household characteristics are determining factors in the differential impact of a disaster. Some groups are less likely to have the capacity and resources to overcome the obstacles presented during a hazardous event.

The COVID-19 pandemic exposed many community leaders to the severity of their limited capacity to mitigate the health and economic impact of a disaster. In Kent County, 23% of residents have three or more risk factors and 54% have one to two risk factors.<sup>li</sup> Data on the impact of COVID-19 has revealed a disproportionate health and economic impact on Blacks and Hispanics. Many of the

risk factors identified are a result of historical discriminatory practices that have persisted for decades.

To assist local governments with addressing the economic impact of the pandemic, additional Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) funds, also known as entitlement funds, were provided through the Coronavirus Aid, Relief, and Economic Security (CARES) Act. Grand Rapids received \$3.3 million, which was used to mitigate the impact of COVID-19 on neighborhoods, and to help sustain through the shutdown and prepare for reopening. In addition to the entitlement funds, the city also allocated an additional \$2.1 million for economic relief efforts. The breakdown of the total \$5.4 million in economic relief includes:

1. \$3.3 million in federal funding
2. \$1 million in housing resiliency
3. \$584,000 from the city's Mobile GR – Parking Services Department
4. \$170,000 in Neighborhood Match Fund Support
5. \$125,000 from the General Fund<sup>iii</sup>

The County also received \$1,556,095 million in federal entitlement funding. The funds will be used to prevent utility shut-off, rent and mortgage payments to prevent homelessness, services to address health needs of residents, legal services for low-income residents, and small business grants. The County also allocated \$114.6 million in CARES Act funding in the following categories:

1. \$35 million County Expenses
2. \$28 million Business Assistance
3. \$3 million Mitigation of Homelessness
4. \$12.2 million Care for Vulnerable Populations
5. \$1 million Compliance with COVID-19-related Public Health Measures
6. \$15 million Assistance to Local Units of Government
7. \$20.334 million Unallocated (Reserve for Possible Second Wave)<sup>iii</sup>

## Section 3: Identification of Impediments to Fair Housing Choice

### Public Sector

Public sector policies and practices have the potential to negatively impact housing choice of individuals and should be reviewed to examine if implementation has created barriers to housing choice.

### Zoning and Site Selection

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

During the community engagement process of this plan development, many stakeholders discussed the needs of affordable housing throughout the city and the county. Most respondents felt the rural villages and townships also felt pressure to increase the availability of affordable housing supplies.

The previous Kent County AI study did not identify any zoning and site selection impediments but outlined a number of strategies to promote fair housing choice throughout the county. Similarly, the previous Grand Rapids AI did not identify any zoning or site selection impediments.

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

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

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

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

### Neighborhood Revitalization, Municipal and Other Services, Employment, Housing, Transportation Linkage

As discussed previously, many focus group members expressed concerns about the transportation systems and their connectivity to places of employment. Transportation challenges were a key concern of northern Kent County residents, where there are very limited public transportation options.

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

The average time on the waiting list for a Housing Choice Voucher (HCV) was 30 months in Grand Rapids and Kent County. Discussions and interviews with fair housing advocates, affordable housing developers, and landlords, pointed to two contributing factors. The first and most important is the lack of HCV availability in the region to meet the demands of low- and moderate-income residents. The availability of HCV is contingent on the number of vouchers authorized and funded by Congress and HUD.

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

### Sale of Subsidized Housing and Possible Displacement

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

Many community advocates expressed concerns about displacement and rising property costs because of neighborhood redevelopment activities. These concerns were largely related to redevelopment efforts occurring within the City of Grand Rapids, particularly among the neighborhoods near downtown, which have seen a significant amount of new market-rate housing over the past decade. Most advocates wanted to be sure that publicly supported developments are planned with the existing residents in mind, including consultations with affected residents before development plans are solidified, and ensuring these developments help existing residents, rather than focusing on "importing" new residents and inadvertently displacing long-term neighborhood residents.

### Property Tax Policies

Several property tax policies exist to encourage the development of affordable housing and to limit the negative effects of rising home values on low-income residents. In the City of Grand Rapids, federal or state assisted low-income housing developments may qualify for tax exemption and payment in lieu of taxes (PILOT). Grand Rapids allows affordable housing owners the option of applying to pay a 4% service fee or paying a lower 3% fee, in which 2% of that charge would fund the City's Affordable Housing Fund. PILOT assists in lowering the operating costs of eligible properties while adding additional affordable housing resources.

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

- Real Property Poverty Exemption Program. This allows very low-income residents to be exempt from property tax obligations if they meet certain poverty income guidelines and demonstrate they cannot afford the tax liability.
- Property Tax Deferments. This is a temporary deferment of payments while a household is experiencing a financial hardship.

- **Nonprofit Housing Tax Exemption.** This is a temporary exemption designed to lower the costs of developing affordable housing by non-profit agencies. This exemption is up to three years, or when the property transfers to a new low-income tenant or owner.

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

### Planning and Zoning Boards

Planning and Zoning Boards have significant influence, directly and indirectly, on the ability to expand fair housing choice. They can expand or contract housing diversity options throughout a community through recommendations on zoning regulations, zoning map changes, and in some cases the approval of specific projects. For example, limiting residential zoning districts to predominately single-family structures will limit the supply and potentially increase the cost of housing. Additionally, it limits the housing choices of those households who do not want or need a single-family structure. Both the City and County have prioritized equitable and diverse boards to ensure the board is representative of the community served.

### Building Codes (Accessibility)

All communities have made great strides in promoting accessibility through new developments and incremental rehabilitations. Kent County and Grand Rapids both support accessibility modification programs and require accessibility features in new construction.

### Fair Housing Ordinance

Grand Rapids' fair housing ordinance was listed as an impediment to fair housing choice in the last AI and the study recommended the City Law Department work to improve the enforceability and effectiveness of the ordinance. The ordinance was amended in 2019 to improve enforceability but is still a source of frustration for many fair housing advocates, particularly the source of income protections.

During the last study, it was recommended that Kent County examine the feasibility of a county-wide fair housing ordinance. A review of their Annual Action Plan and an ordinance search indicates that there has been no progress made to pass an ordinance.

## Public and Private Sector

### Fair Housing Enforcement

The Fair Housing Assistance Program (FHAP) is an intergovernmental enforcement partnership between HUD and the state or local agencies. As in any partnership, both parties must contribute to the success of the program. The Fair Housing Act contemplates that, across the country, state and local governments will enact and enforce their own statutes and ordinances that are substantially equivalent to the Fair Housing Act. HUD provides FHAP funding annually on a noncompetitive basis to state and local agencies that administer fair housing laws that provide rights and remedies that are substantially equivalent to those provided by the Fair Housing Act. A state or local agency may be certified as substantially equivalent after it applies for certification and HUD determines that the agency administers a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. A substantially equivalent agency's law may include additional protected classes. Typically, once certified, HUD will refer complaints of housing discrimination that it receives to the state or local agency for investigation.<sup>lv</sup> The Michigan Department of Civil Rights serves as the FHAP agency for Kent County and Grand Rapids. FHAP data specific to Kent County and Grand Rapids was not available for analysis.

Fair housing organizations and other non-profits that receive funding through the Fair Housing Initiatives Program (FHIP) assist people who believe they have been victims of housing discrimination. FHIP organizations partner with HUD to help people identify government agencies (FHAPs) that handle complaints of housing discrimination. They also conduct preliminary investigation of claims, including sending "testers" to properties suspected of practicing housing discrimination. In addition to funding organizations that provide direct assistance to individuals who feel they have been discriminated against while attempting to purchase or rent housing, FHIPs also have initiatives that promote fair housing laws and equal housing opportunity awareness.<sup>lv</sup>

The Fair Housing Center of West Michigan (FHCWM) is a private, non-profit fair housing organization committed to providing comprehensive fair housing services, including education, outreach, research, advocacy, and enforcement. The Fair Housing Center is the front door to housing choice, ensuring that everyone in the community has equal opportunity to choose housing that is right for them. Through education, research, and advocacy, FHCWM prevents housing discrimination, removes barriers that allow it to persist, and restores housing choice when discrimination happens. FHCWM currently serves 12 counties in western Michigan: Allegan, Grand Traverse, Ionia, Isabella, Kent, Mecosta, Montcalm, Muskegon, Newaygo, Oceana, Osceola, and Ottawa as the FHIP agency.<sup>lvi</sup>

### Informational Programs

FHCWM offers education programs and resources to the community, professionals in the housing industry, advertisers, sales staff, and government officials and lawmakers to build awareness of fair housing laws. The City and County provide education on fair housing rights and contact information for organizations that can provide assistance related to fair housing issues on their website at [www.grcd.info](http://www.grcd.info) and <https://www.accesskent.com/Departments/CommunityAction/documents.htm>.

### Visitability in Housing

According to Visitability.org, visitability refers to a single-family or owner-occupied housing designed in such a way that it can be lived in or visited by people who have trouble with steps or who use wheelchairs or walkers. A house is visitable when it meets three basic requirements:

- One zero-step entrance
- Doors with 32 inches of clear passage space
- One bathroom on the main floor you can get into in a wheelchair

The leading disabilities for Grand Rapids and Kent County were ambulatory and independent living difficulty. Visitability policies in the city and county will not only benefit residents, but also their friends and families. Incorporating visitability standards increases the ability of residents throughout the city and county to visit friends and family.

Visitability focuses on laws and policies. Since there is no additional cost to visitability design standards, no financial benefit should need to be offered to meet the standards. However, Michigan does not allow local governments to make changes to their Residential or Building Codes.<sup>lvii</sup>

### Noncompliance by HUD

No areas of noncompliance were identified.

## Section 4: Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

The previous fair housing study provided an overview of activities that support fair housing choice. The information is still relevant to this study.

**“Fair Housing” Ordinance Change.** The City implemented its 1999 Fair Housing Task Force recommendations to strengthen the language of the local “Fair Housing” Ordinance. Section 9.363’s definition of *Source of Lawful Income* now includes Section 8 assistance and Sections 9.857 (1) and 9.588 were amended, shifting the City’s ordinance from criminal to civil, and establishing civil fines for first, second and subsequent offenses. These changes were intended to eliminate discrimination against people using housing vouchers for rental housing and to make enforcement of discrimination more efficient and effective.

During the current plan period, the City considered strategies for enforcement. However, fair housing advocates indicated that there are still challenges to enforcing the City’s fair housing ordinance. During the current plan period, the City updated protected classes in discrimination ordinances for consistency.

**The Fair Housing Center of West Michigan.** The City of Grand Rapids and Kent County support fair housing education and enforcement activities through contracts with the FHCWM. Such contracts have been in force, at various levels, since the early 1980s. Both the City and the County continue to provide funding for fair housing activities to include testing, investigation of complaints, and complaint processing, as well as educational and outreach activities to the housing industry, community organizations, and the public at large. These activities are intended to reduce steering, segregation, and mortgage lending discrimination, among others. These activities should be continued. The City provided \$75,000 per year each year of the current plan period to support education, outreach, and enforcement activities. Review of County Consolidated Annual Performance and Evaluation Reports (CAPER) indicates that the County provided \$40,000 per year. More information on specific activities can be found later in the report.

**Master Plan.** The City’s 2002 Master Plan emphasizes the importance of housing choice, noting that “Housing choice should be made available to people of different ages, ethnicity and income levels” and “Homeownership for all income, racial, ethnic and disability groups will increase in many neighborhoods.” The Plan recommends making Grand Rapids a competitive housing location, providing a choice of neighborhood types, each with expanded ranges of housing opportunities, encouraging continuous neighborhood reinvestment, and improving walkability. The Plan also emphasizes mixed-use neighborhoods and coordinating density with transportation. The City’s annual budget, capital spending, and racial equity plan show a continued commitment to equitable investment in underserved communities. The County also shows a commitment to an equitable investment of resources in its strategic plan.

**Zoning Ordinance.** The Zoning Ordinance is the regulatory device that implements the Master Plan. A total re-write of the outdated Grand Rapids’ 1969 ordinance was completed in 2007. Fair housing and affordable housing are supported in a number of ways; specifically, the Ordinance has made it easier for more dense rental development to be built outside the GTA and provides a density bonus for mixed-income housing projects. Within Kent County, each jurisdiction has their own zoning laws. There were no concerns with zoning ordinances. Both the City and County should maintain their commitment to diversity by being intentional in recruitment efforts to



identify a diverse pool of potential board members that are representative of the community served.

**Code Enforcement.** The City of Grand Rapids funds code enforcement programs that ensure a suitable living environment for Grand Rapids' citizens regardless of income, neighborhood, race, ethnicity, or housing type (rental vs. ownership). Code enforcement activities are specifically funded in the GTA, where many of the city's low- and moderate-income residents live, and where there are racial/ethnic concentrations.

**Affordable Housing Projects.** An increase in quality affordable housing choices for low- and moderate-income groups decreases their vulnerability to discriminatory practices. The City and County consistently fund affordable housing projects that produce affordable rental and homeownership opportunities for many residents in these income categories. However, focus group participants expressed concern about the availability and equitable distribution throughout the city and county.

**Economic Development.** Increasing residents' economic opportunities can lead to greater housing options. The City and County Economic Development Departments work closely with businesses and nonprofit agencies to promote the attraction, retention, and growth of businesses within the city and county limits. The City and County Community Development Departments fund nonprofit agencies that provide economic development programs. The City has special emphasis on low- and moderate-income areas. Activities provide access to tax credits, networking, business skills development, and promote employment opportunities. Data show a disparity with women and minority business representation. Both the City and County should continue to support procurement diversity within their own organizations, as well as support small and microbusiness enterprise technical assistance programs to build capacity.

Recently, the City of Grand Rapids developed the Equitable Economic Development & Mobility Strategic Plan, which serves as a guide for the departments of Economic Development and Mobile GR. It provides recommendations on policies, programs and investments. The purpose of the plan is to:

- Identify and rank public investment related to economic development and mobility
- Increase access to opportunity with an emphasis on the Neighborhoods of Focus
- Guide greater efforts in transparency, communications and investments

**Rental Property Owners Association (RPOA).** The RPOA is a nonprofit business association that addresses the needs of rental property owners in West Michigan through various programs, services, and benefits. Fair housing training is available to over 1,400 members made available by the City and County's continued funding of FHCWM during the plan period.

Focus group participants indicate steering may be an issue. Education and outreach should also include realtors to ensure they are not steering individuals into certain neighborhoods and away from others.

**Lender Certification of Compliance.** The City of Grand Rapids has a Memorandum of Understanding (MOU) with all lenders who participate in its Homebuyer Assistance Fund Program. These agreements are made at the corporate level, signed by an officer of the corporation and notarized. Through these MOU, 15 area lenders have certified they comply with the Fair Housing

Act, Executive Order 11063, Equal Credit Opportunity Act, Real Estate Settlement Procedures Act, and Home Mortgage Disclosure Act.

Access to lending continues to be a barrier in low income and minority communities. A banker's council would strengthen the relationship between City and County administrators and financial institutions in order to develop products specific to the needs of the community and to continue leveraging entitlement and CRA dollars for equitable reinvestment. The Council should include regional lenders and local CRA officers. However, the City and County should leverage their influence to engage corporate leadership who have the authority to adequately allocate private resources to compliment public investments. A membership and partnership with the National Community Reinvestment Coalition (NCRC) would assist with achieving this goal.

### Evaluation of Jurisdiction’s Current Fair Housing Legal Status

During the 2016-2020 plan period, the City Attorney’s Office also worked to develop strategies for enforcement of the City’s Civil Rights Ordinances related to all sources of lawful income. During interviews with fair housing advocates, it was communicated that barriers to enforcement still exist. The City should recommit to enforcement. If that is not possible, the city should consider other options to incentivize landlords to accept various sources of income. The City should also ensure that adequate resources and political will are available for enforcement. Table 61 provides an overview of the City’s anti-discrimination ordinances and City Commission policies related to housing.

The City also provided funding to interpretation and translation services on housing transactions for non-English-speaking residents and should continue to provide resources.

Table 61: Protected Classes

	Protected Classes	Race	Color	National Origin	Religion	Sex/Gender	Sexual Orientation	Gender Identity	Gender Expression	Familial Status	Disability	Family Size	Age	Marital Status	Income/Public	Ancestry	Creed	Genotype	Height	Weight	Medical Condition
<b>Jurisdiction</b>	<b>Policy</b>																				
United States	Fair Housing Act	x	x	x	x	x				x	x										
Michigan	Fair Housing Act	x	x	x	x	x				x	x										
Grand Rapids	City Commission Policy Comprehensive Housing Policy	x			x	x					x	X	x	x	x						
	Ord. Sec. 9.362 Discrimination in Real Property Transactions	x	x	x	x	x	x	x	x	x	x		x	x	x	x	x	x	x	x	x
	Ord. Sec. 9.995 Human Rights	x	X	x	x	x	x	x	x	x	x	x	x	x	x		x	x	x	x	x
	Ord. Sec. 1.341	x	x	x	x	x	x	x				x	x	x		x	x		x	x	
	Ord. Sec. 1.347	x	x	x	x	x	x	x				x	X	x		x	x		x	x	

Source: 2020 Grand Rapids’ Code of Ordinances and City Commission Policy Analysis Conducted by HSG

Regarding disability, Michigan's law sets an equivalent standard of accommodation to that of the federal Fair Housing Act. State and federal laws support the obligations of a housing provider to reasonably accommodate a person with a disability and to allow people with disabilities to make reasonable modifications to a dwelling. Fair housing law also makes it unlawful to discriminate when providing financial assistance or financing, or to use a discriminatory application form in connection with a housing transaction (including construction, rehabilitation, repair, maintenance, or improvement of housing).

The City of Grand Rapids has codified its commitment to fair housing. During the last study period, the City updated their discrimination policies so that protected classes are consistent. Excerpted from the City Code, Chapter 160 Discrimination in Real Property Transactions:

Sec. 9.362. Policy.

It is hereby declared to be contrary to the public policy of the City of Grand Rapids (City) for any person to deny any individual the enjoyment of civil rights, or for any person to discriminate against any individual in the exercise of civil rights because of actual or perceived color, race, religion or creed, sex, gender identity or expression, sexual orientation, national origin, genotype, age, marital status, familial status, medical condition, disability, height, weight, or source of lawful income (cumulatively known as protected classes).

Excerpted from the City Code, Article 3. Community Relations Commission:

Sec. 9.955 Human Rights – Statement of Policy

It is hereby declared to be contrary to the public policy of the City of Grand Rapids (City) for any person to deny any individual the enjoyment of civil rights, or for any person to discriminate against any individual in the exercise of civil rights because of actual or perceived color, race, religion or creed, sex, gender identity or expression, sexual orientation, national origin, genotype, age, marital status, familial status, medical condition, disability, height, weight, or source of lawful income (cumulatively known as protected classes).

Sec. 1.341. Community Relations Commission - Statement of Public Policy and Finding of Necessity.

It is hereby declared to be contrary to the public policy of the City of Grand Rapids for any person to deny any other person the enjoyment of his or her civil rights or for any persons to discriminate against any other person in the exercise of his or her civil rights because of race, color, creed, religion, national origin, ancestry, age, gender, marital status, disability, height, weight, sexual orientation, or gender identity.

Sec. 1.347. Community Relations Commission - Civil Rights Defined.

HOUSING - The opportunity to obtain employment without discrimination because of race, color, creed, religion, national origin, ancestry, age, gender, marital status, disability, height, weight, sexual orientation, or gender identity is hereby recognized and declared to be a civil right.

As stated previously, it appears there has been no progress to pass a countywide fair housing ordinance. However, there has been efforts at the State level.

## Fair Housing Complaints and Compliance Reviews

Between 2016 and 2020, FHCWM investigated 343 cases in Grand Rapids of which 65% were No Probable Cause and 30% Probable Cause. The rest are pending. The majority of cases were related to rental (66%) and reasonable accommodation (24%). Of the total cases investigated, 47% were disability, 29% race/color, and 16% familial status. The tables below provide additional information on cases investigated during the period.

Table 62: Grand Rapids Fair Housing Case Outcome

Outcome	2015	2016	2017	2018	2019	2020	Total	% of Cases
No Probable Cause	40	46	36	28	38	34	222	65%
Negotiated Settlement Agreement	5	4	1	1			11	3%
Probable Cause	23	13	11	12	25	18	102	30%
Pending	0	0	0	0	0	8	8	2%
<b>Total</b>	<b>68</b>	<b>63</b>	<b>48</b>	<b>41</b>	<b>63</b>	<b>60</b>	<b>343</b>	

Source: FHCWM Grand Rapids Fair Housing Complaint Data

Table 63: Grand Rapids Fair Housing Case Type

Intake Type	2015	2016	2017	2018	2019	2020	Total	% of Cases
Insurance	1	1	1	0	1	0	4	1%
Mortgage	1	0	1	1	0	1	4	1%
Reasonable Accommodation	13	12	10	13	22	14	84	24%
Rental	52	46	33	24	31	39	225	66%
Sales	1	0	0	0	0	1	2	1%
Reasonable Modification	0	1	1	1	3	1	7	2%
Design & Construction	0	2	0	1	2	1	6	2%
Harassment	0	1	1	1	2	3	8	2%
Retaliation	0	0	1	0	0	0	1	0%
Other	1	0	0	0	0	1	2	1%
<b>Total</b>	<b>69</b>	<b>63</b>	<b>48</b>	<b>41</b>	<b>61</b>	<b>61</b>	<b>343</b>	

Source: FHCWM Grand Rapids Fair Housing Complaint Data

Table 64: Grand Rapids Fair Housing Case Basis

Basis	2015	2016	2017	2018	2019	2020	Total	% of Cases
Age	3	1	0	0	3	1	8	2%
Race	9	21	23	15	18	12	98	29%
Gender	0	2	2	3	3	5	15	4%
Disability	34	25	17	17	33	35	161	47%
Familial	17	9	6	6	9	8	55	16%
National Origin	2	3	3	1	1	0	10	3%
Religion	1	1	0	2	0	2	6	2%
Sexual Orientation	2	0	1	0	0	0	3	1%
Source of Income	2	8	1	3	3	1	18	5%
Marital Status	1	1	0	1	0	0	3	1%
Total	71	71	53	48	70	64	95	

Source: FHCWM Grand Rapids Fair Housing Complaint Data

During the plan period, FHCWM investigated 222 cases in Kent County of which 53% were No Probable Cause, 29% Probable Cause, and 12% were Negotiated Settlement Agreements. The rest are pending. The majority of cases were related to rental (66%) followed by reasonable accommodation (20%). Of the total cases investigated, 35% were disability, 27% race/color, and 20% familial status. The tables below provide additional information on cases investigated during the period and do not include Grand Rapids and Wyoming.

Table 65: Kent County Fair Housing Case Outcome

Outcome	2015	2016	2017	2018	2019	2020	Total	% of Cases
No Probable Cause	21	31	24	25	9	8	118	53%
Negotiated Settlement Agreement	9	8	7	1	1	0	26	12%
Probable Cause	10	13	10	10	10	12	65	29%
Pending	1	4	1	1		6	13	6%
Total	41	56	42	37	20	26	222	

Source: FHCWM Grand Rapids Fair Housing Complaint Data

Table 66: Kent County Fair Housing Case Type

Intake Type	2015	2016	2017	2018	2019	2020	Total	% of Cases
Advertising	0	1	0	0	0	1	2	1%
Insurance	0	0	0	1	0	0	1	0%
Mortgage	1	1	0	3	0	1	6	3%
Reasonable Accommodation	9	14	6	6	4	6	45	20%
Rental	25	35	32	26	14	15	147	66%
Sales	2	1	1	0	1	3	8	4%
Reasonable Modification	2	1	3	1	0	0	7	3%
Design & Construction	0	1	0	0	0	0	1	0%
Harassment	1	1	0	0	1	0	3	1%
Retaliation	0	0	0	0	0	0	0	0%
Zoning	1	1	0	0	0	0	2	1%
Other	0	0	0	0	0	0	0	0%
<b>Total</b>	<b>41</b>	<b>56</b>	<b>42</b>	<b>37</b>	<b>20</b>	<b>26</b>	<b>222</b>	

Source: FHCWM Grand Rapids Fair Housing Complaint Data

Table 67: Kent County Fair Housing Case Basis

Basis	2015	2016	2017	2018	2019	2020	Total	% of Cases
Age	1	1	3	0	0	1	6	2%
Race	8	14	15	16	7	6	66	27%
Gender	1	2	2	2	0	0	7	3%
Disability	21	21	14	9	8	13	86	35%
Familial Status	8	16	11	7	4	4	50	20%
National Origin	1	4	4	2	1	4	16	7%
Religion	0	1	0	0	0	0	1	0%
Sexual Orientation							0	0%
Source of Income	2	0	3	0	1	1	7	3%
Marital Status	0	0	1	0	0	0	1	0%
National Origin - Hispanic/Latino	0	0	0	2	0	0	2	1%
National Origin - Kenya	0	0	0	1	0	0	1	0%
Other	1	0	0	0	0	0	1	0%
<b>Total</b>	<b>43</b>	<b>59</b>	<b>53</b>	<b>39</b>	<b>21</b>	<b>29</b>	<b>244</b>	

Source: FHCWM Grand Rapids Fair Housing Complaint Data

## Review of the Status of 2016-2021 Impediments to Fair Housing Choice

Grand Rapids identified the following impediments during the previous plan period:

- Inability to successfully prosecute violations of the local fair housing ordinance.
- Lack of education and awareness of fair housing laws.
- Language barriers for non-English speaking populations.
- Systemic barriers to fair housing choice.
- Limited supply of accessible housing.
- Funding for fair housing activities.

Between 2016 – 2020, the City provided funding for fair housing activities, including prosecuting violations of the local fair housing ordinance. The City increased education and awareness by allocating \$75,000 per year to the Fair Housing Center of West Michigan during the 2016-2020 plan period to support education and outreach, testing, and marketing efforts. A review of activities also indicates that the City supported services to reduce barriers to accessing information and services to non-English- speaking populations. Funding also supported housing-related needs of people with disabilities by supporting the Home Repair Services' Access Modification Program and Disability Advocates of Kent County's Accessible Housing Services Program.

While the City addressed impediments identified in the previous study, survey results indicated there is a continued need for education and awareness of fair housing laws and resources for addressing discrimination. Fair housing advocates also expressed concerns regarding the limited ability to enforce local fair housing laws, specifically the source of income protection.

Kent County provided \$40,000 per year for testing and education and outreach activities during the previous plan period. During the previous plan period, Kent County's activities focused on:

- Providing public services through FHCWM countywide to investigate fair housing concerns and increase awareness
- Providing public services through Senior Neighbors countywide to assist seniors with housing concerns
- Providing public services through Hope Network countywide to provide specialized transportation for seniors and persons with disabilities

## Section 5: Conclusions and Recommendations

The following impediments to fair housing choice were identified and are under review:

### **Impediment 1: Disparity in access to safe and affordable housing.**

Analysis of census data, focus group discussions, and survey results indicate a need to improve the quality of existing housing and expand access to safe and affordable housing throughout the county.

### **Impediment 2: Unequal access to opportunity.**

Unequal access to opportunities, including employment, housing and education exist in Grand Rapids and Kent County. Equitable efforts should be undertaken to bridge the gaps in access and opportunity such as workforce and small business development programs to combat high young adult unemployment rates and wage disparities between black and white workers and support



systems for women to enter and stay in the workforce. An enhanced focus on increasing minority homeownership and growing disadvantaged businesses will help bridge the wealth gap between white and non-white householders.

Both the City and County have a commitment to procurement diversity and developing small businesses as evidenced in review of their policies. While both show intentionality in procuring with diverse firms, in order to create equity in procurement, a disparity study is required. The *Richmond vs. J.A. Croson* case filed in the U.S. Supreme Court in 1989, ruled that governments must establish a “compelling interest” to support the creation of race and gender conscious small business programs. The study helps ensure any race- or gender-based remedial programs will withstand scrutiny in a court of law. The primary goal of the study is to assess, quantify, and evaluate the prevalence, significance (degree and weight) and scope of discrimination in the marketplace. The study ensures that a race and gender conscious program is legally defensible and narrowly tailored to address passive discrimination in the public and private market.<sup>lx</sup>

**Impediment 3: Segregated living patterns.**

Historic red-lining and block busting practices, along with housing and transportation policies, have created segregated living patterns in Kent County and Grand Rapids. Efforts should be strengthened to ensure countywide distribution of affordable housing, improve access to transportation, increase homeownership in minority communities, and improve the utilization and acceptance of the Housing Choice Voucher program.

**Impediment 4: Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)**

Efforts should be undertaken to provide meaningful transformation in R/ECAP neighborhoods to increase household income of existing residents through better access to jobs, transportation and/or education. Scaling minority-owned businesses in racially and ethnically concentrated neighborhoods can also play a role in transforming hyper-segregated communities.

**Impediment 5: Civil rights and fair housing violations**

Kent County and Grand Rapids should take steps to strengthen and improve their civil rights and fair housing protections through changes in local ordinances, strengthening the role of departments responsible for enforcement, enhanced outreach and education, and targeted fair housing testing.

## 2021-2025 Fair Housing Action Plan

Impediment	Activity	Responsible Party
<b>Impediment 1: Disparity in access to affordable housing throughout Kent County</b>		
	1.1 Support housing repairs to address lead-based paint and other health and safety hazards.	Grand Rapids, Kent County
	1.2 Enhance landlord education and outreach on the Housing Choice Voucher and other rental assistance programs.	Public Housing Authorities, Continuum of Care, Fair Housing Center of West Michigan (FHCWM)
	1.3 Advocate for a balanced urban/rural scoring system in future Qualified Action Plans (QAPs) used to allocate Low-Income Housing Tax Credits.	Kent County
	1.4 Support and advocate for initiatives that provide access to housing for persons with disabilities (including those with mobility impairments, mental health challenges, and developmental and intellectual disabilities).	Grand Rapids, Kent County
	1.5 Encourage implementation of Universal Design standards for housing units built or substantially rehabilitated.	Grand Rapids, Kent County
	1.6 Partner with the National Community Reinvestment Coalition (NCRC) to address lending disparities by developing community benefit agreements with financial institutions.	Grand Rapids, Kent County
<b>Impediment 2: Unequal Access to opportunity</b>		
	2.1 Support workforce development programs for people of color, women, and youth to address high unemployment.	Grand Rapids, Kent County
	2.2 Support childcare, after school, and other programs to facilitate labor market participation amongst women with children.	Grand Rapids, Kent County
	2.3 Support county-wide access to high-speed internet for virtual learning and remote work.	Kent County, Essential Needs Task Force
	2.4 Partner with lenders to increase homeownership and small business development among persons of color.	Grand Rapids, Kent County
	2.5 Conduct a study on disparities among minority and women-owned firms. The study will ensure efforts to create increase economic opportunities and access are legally defensible.	Grand Rapids, Kent County

Impediment	Activity	Responsible Party
<b>Impediment 3: Segregated living patterns</b>		
	3.1 Advocate for more equitable distribution of LIHTC, public housing and multi-family assisted developments throughout the county.	Grand Rapids, Kent County, Public Housing Authorities (Grand Rapids, Kent County, Wyoming, and Rockford)
	3.2 Improve Housing Choice Voucher utilization and acceptance.	Public Housing Authorities (Grand Rapids, Kent County, Wyoming, and Rockford)
	3.3 Support and be intentional about diversity on planning, zoning, and transportation boards to ensure representation of the community served.	Grand Rapids, Kent County
	3.4 Proactively engage owners of affordable housing developments with expiring Section 8 contracts and advocate for their continuance in the program.	Public Housing Authorities (Grand Rapids, Kent County, Wyoming, and Rockford)
<b>Impediment 4: Racially and ethnically concentrated areas of poverty ( R/ECAPs)</b>		
	4.1 Collaborate with banks and lending institutions to find ways to expand access to capital and wealth creation for those living in R/ECAPs.	Grand Rapids, Kent County
	4.2 Target resources towards programs that increase income and opportunity in R/ECAPs.	Grand Rapids, Kent County
<b>Impediment 5: Civil rights and fair housing violations</b>		
	5.1 Strengthen local enforcement of source of income protection.	Grand Rapids
	5.2 Advocate for statewide and local source of income legislation.	Grand Rapids, Kent County, Essential Needs Task Force
	5.3 Provide education and outreach to landlords with a focus on the following protected classes: persons with disabilities, race and familial status.	FHCWM
	5.4 Conduct testing for discrimination related to disabilities, race and familial status with a focus on landlords higher opportunity census tracts.	FHCWM
	5.5 Provide fair housing education for realtors, lenders, and landlords	FHCWM
	5.6 Provide interpretation and translation services on housing transactions for non-English speaking residents	Grand Rapids, Kent County, FHCWM
	5.7 Encourage a county-wide fair housing ordinance.	Kent County

---

## Section 6: Chief Elected Official Signature Page

## Endnotes

- 
- <sup>i</sup> <https://griid.org/2019/01/15/the-racial-segregation-of-housing-in-grand-rapids-past-and-present/>
- <sup>ii</sup> <https://grpeopleshistory.files.wordpress.com/2014/08/1947-grand-rapids-housing-report.pdf>
- <sup>iii</sup> <https://www.nar.realtor/sites/default/files/documents/2018-February-Fair-Housing-Story.pdf>
- <sup>iv</sup> <https://grpeopleshistory.org/2016/03/04/roughly-4000-people-were-displaced-from-highway-construction-through-grand-rapids-an-interview-with-fr-dennis-morrow/>
- <sup>v</sup> <https://www.theatlantic.com/business/archive/2016/03/role-of-highways-in-american-poverty/474282/>
- <sup>vi</sup> [https://www.americashealthrankings.org/explore/health-of-women-and-children/measure/concentrated\\_disadvantage/state/IN](https://www.americashealthrankings.org/explore/health-of-women-and-children/measure/concentrated_disadvantage/state/IN)
- <sup>vii</sup> <https://www.grandrapidsmi.gov/Government/Departments/Budget-Office/Library/Current>
- <sup>viii</sup> [https://www.census.gov/glossary/#term\\_Householder](https://www.census.gov/glossary/#term_Householder)
- <sup>ix</sup> <https://www.census.gov/glossary/>
- <sup>x</sup> [www.countyhealthrankings.org/app/michigan/2020/measure/factors/44/description](http://www.countyhealthrankings.org/app/michigan/2020/measure/factors/44/description)
- <sup>xi</sup> <https://www.cityhealthdashboard.com/mi/grand%20rapids/metric-detail?metric=16>
- <sup>xii</sup> <https://www.countyhealthrankings.org/app/michigan/2020/rankings/kent/county/outcomes/overall/snapshot>
- <sup>xiii</sup> <https://www.census.gov/topics/income-poverty/about.html>
- <sup>xiv</sup> <http://neocando.case.edu/cando/pdf/CensusPovertyandIncomeIndicators.pdf>
- <sup>xv</sup> <https://hudgis-hud.opendata.arcgis.com/>
- <sup>xvi</sup> <https://livingwage.mit.edu/metros/24340>
- <sup>xvii</sup> <https://www.rightplace.org/industry-sectors>
- <sup>xviii</sup> [https://www.census.gov/glossary/#term\\_Laborforceparticipationrate](https://www.census.gov/glossary/#term_Laborforceparticipationrate)
- <sup>xix</sup> <https://www.gvmc.org/kent-county-transit-needs-assessment>
- <sup>xx</sup> <https://www.ridetherapid.org/>
- <sup>xxi</sup> <https://www.huduser.gov/portal/pdredge/pdr%20edge%20featd%20article%20092214.html#:~:text=HUD%20defines%20cost%2Dburdened%20families,of%20one's%20income%20on%20rent.>
- <sup>xxii</sup> <https://www.census.gov/quickfacts/fact/note/US/HSG650218>
- <sup>xxiii</sup> [https://www.census.gov/glossary/#term\\_Grossrent](https://www.census.gov/glossary/#term_Grossrent)
- <sup>xxiv</sup> <https://www.huduser.gov/portal/datasets/fmr.html>
- <sup>xxv</sup> <https://www.federalreserve.gov/econres/notes/feds-notes/disparities-in-wealth-by-race-and-ethnicity-in-the-2019-survey-of-consumer-finances-20200928.htm>
- <sup>xxvi</sup> [https://www.urban.org/sites/default/files/publication/103267/closing-the-gaps-building-black-wealth-through-homeownership\\_1.pdf](https://www.urban.org/sites/default/files/publication/103267/closing-the-gaps-building-black-wealth-through-homeownership_1.pdf)
- <sup>xxvii</sup> <https://www.federalreserve.gov/econres/notes/feds-notes/disparities-in-wealth-by-race-and-ethnicity-in-the-2019-survey-of-consumer-finances-20200928.htm>
- <sup>xxviii</sup> [https://www.federalreserve.gov/boarddocs/supmanual/cch/fair\\_lend\\_fmact.pdf](https://www.federalreserve.gov/boarddocs/supmanual/cch/fair_lend_fmact.pdf)
- <sup>xxix</sup> [https://ncrc.org/wp-content/uploads/dlm\\_uploads/2018/02/NCRC-Research-HOLC-10.pdf](https://ncrc.org/wp-content/uploads/dlm_uploads/2018/02/NCRC-Research-HOLC-10.pdf)
- <sup>xxx</sup> [www.consumerfinance.gov](http://www.consumerfinance.gov)
- <sup>xxxi</sup> <https://www.cityhealthdashboard.com/metric/48>
- <sup>xxxii</sup> <https://www.cityhealthdashboard.com/mi/grand%20rapids/metric-detail?metric=46>
- <sup>xxxiii</sup> [https://www.accesskent.com/Health/Lead/pdf/2018\\_Report.pdf](https://www.accesskent.com/Health/Lead/pdf/2018_Report.pdf)
- <sup>xxxiv</sup> <https://www.huduser.gov/portal/datasets/cp.html#:~:text=CHAS%20refers%20to%20the%20Comprehensive.income%20limits%20are%20calculated%20annually.>
- <sup>xxxv</sup> <http://www.ajjcs.net/paper/main/2016/01/25/the-relationship-between-housing-and-overall-quality-of-life/>
- <sup>xxxvi</sup> <https://www.cityhealthdashboard.com/mi/grand%20rapids/metric-detail?metric=19>
- <sup>xxxvii</sup> <https://www.countyhealthrankings.org/app/michigan/2020/rankings/kent/county/outcomes/overall/snapshot>
- <sup>xxxviii</sup> <https://www.mlive.com/public-interest/2020/03/michigans-class-of-2019-sets-new-record-for-high-school-graduation-rate.html>

- 
- xxxix <https://www.cityhealthdashboard.com/metric/51>
- xl <https://www.grandrapidsmi.gov/Government/Departments/Budget-Office/Library/Current>
- xli <https://www.cityhealthdashboard.com/mi/grand%20rapids/metric-detail?metric=51>
- xlii <https://www.grandrapidsmi.gov/Government/Departments/Budget-Office/Library/Current>
- xliii [https://cms4.revize.com/revize/kentparks/document\\_center/brochures/KentCountyParks\\_webBrochure.pdf](https://cms4.revize.com/revize/kentparks/document_center/brochures/KentCountyParks_webBrochure.pdf)
- xliv <https://www.grandrapidsmi.gov/Government/Departments/Budget-Office/Library/Current>
- xlv <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1540-6261.2005.00729.x>
- xlvi <http://economics.mit.edu/files/10143>
- xlvii <https://www.cbpp.org/sites/default/files/atoms/files/1-17-20hous.pdf>
- xlviii <https://www.cityhealthdashboard.com/mi/grand%20rapids/metric-detail?metric=38>
- xlix <https://www.irs.gov/charities-non-profits/community-health-needs-assessment-for-charitable-hospital-organizations-section-501r3>
- <sup>1</sup> [file:///C:/Users/Admin/Dropbox/My%20PC%20\(DESKTOP-1HMQK0T\)/Downloads/Grand-Rapids-2020-CHNA.pdf](file:///C:/Users/Admin/Dropbox/My%20PC%20(DESKTOP-1HMQK0T)/Downloads/Grand-Rapids-2020-CHNA.pdf)
- <sup>2</sup> <https://uscensus.maps.arcgis.com/apps/opsdashboard/index.html#/f8fc348e4c99498baf18af09d4401553>
- lii <https://mibiz.com/sections/economic-development/grand-rapids-2021-budget-puts-5-4m-to-neighborhood-business-relief>
- liii [https://www.accesskent.com/Departments/BOC/pdfs/COVID\\_Subcommitte\\_Report.pdf](https://www.accesskent.com/Departments/BOC/pdfs/COVID_Subcommitte_Report.pdf)
- liv [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/partners/FHAP#FHAP1](https://www.hud.gov/program_offices/fair_housing_equal_opp/partners/FHAP#FHAP1)
- lv [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/partners/FHIP#\\_What\\_Is\\_the](https://www.hud.gov/program_offices/fair_housing_equal_opp/partners/FHIP#_What_Is_the)
- lvi <http://www.fhcwm.org/aboutus>
- lvii [www.visitability.org](http://www.visitability.org)
- lviii <https://www.mgtconsulting.com/insights/what-is-a-disparity-study-and-why-does-your-organization-need-one/>

---

## Bibliography

“1947 Grand Rapids Housing Report.” *Grpeoplehistory*,

<https://grpeoplehistory.files.wordpress.com/2014/08/1947-grand-rapids-housing-report.pdf>.

Bhutta, Neil, et al. “Disparities in Wealth by Race and Ethnicity in the 2019 Survey of Consumer

Finances.” *Federal Reserve*, 28 Sept. 2020, Disparities in Wealth by Race and Ethnicity in the

2019 Survey of Consumer Finances.

Bureau, US Census. “About.” *The United States Census Bureau*,

<https://www.census.gov/topics/income-poverty/about.html>. Accessed 23 Dec. 2020.

*City Health Dashboard*. <https://www.cityhealthdashboard.com/>. Accessed 23 Dec. 2020.

“Consumer Financial Protection Bureau.” *Consumer Financial Protection Bureau*,

<https://www.consumerfinance.gov/>. Accessed 23 Dec. 2020.

*Disparities in Wealth by Race and Ethnicity in the 2019 Survey of Consumer Finances*.

<https://www.federalreserve.gov/econres/notes/feds-notes/disparities-in-wealth-by-race-and-ethnicity-in-the-2019-survey-of-consumer-finances-20200928.htm>. Accessed 23 Dec. 2020.

---. [https://www.federalreserve.gov/econres/notes/feds-notes/disparities-in-wealth-by-race-and-](https://www.federalreserve.gov/econres/notes/feds-notes/disparities-in-wealth-by-race-and-ethnicity-in-the-2019-survey-of-consumer-finances-20200928.htm)

[ethnicity-in-the-2019-survey-of-consumer-finances-20200928.htm](https://www.federalreserve.gov/econres/notes/feds-notes/disparities-in-wealth-by-race-and-ethnicity-in-the-2019-survey-of-consumer-finances-20200928.htm). Accessed 23 Dec. 2020.

“Ending Child Lead Exposure in Kent County.” *Access Kent*, Kent County Lead Task

Force, [https://www.accesskent.com/Health/Lead/pdf/2018\\_Report.pdf](https://www.accesskent.com/Health/Lead/pdf/2018_Report.pdf).

*Fair Market Rents | HUD USER*. <https://www.huduser.gov/portal/datasets/fmr.html>. Accessed 23

Dec. 2020.

“Federal Fair Lending Regulations and Statutes.” *Federal Reserve*,

[https://www.federalreserve.gov/boarddocs/supmanual/cch/fair\\_lend\\_fhact.pdf](https://www.federalreserve.gov/boarddocs/supmanual/cch/fair_lend_fhact.pdf).

---

“How Healthy Is Your County? | County Health Rankings.” *County Health Rankings & Roadmaps*,

<https://www.countyhealthrankings.org/county-health-rankings-roadmaps>. Accessed 23 Dec. 2020.

Johnson, A. J. “The Relationship Between Housing and Overall Quality of Life.” *A. J. Johnson Consulting Services, Inc.*, 25 Jan. 2016,

<http://www.ajjcs.net/paper/main/paper/main/2016/01/25/the-relationship-between-housing-and-overall-quality-of-life/>.

*Kent County, MI | Data USA*. <https://datausa.io/profile/geo/kent-county-mi>. Accessed 23 Dec. 2020.

---. <https://datausa.io/profile/geo/kent-county-mi>. Accessed 23 Dec. 2020.

*Kent County Parks*, 2020, [www.kentcountyparks.org/](http://www.kentcountyparks.org/).

*Kent County Transit Needs Assessment*, Grand Valley Metropolitan Council, OAD,

[www.gvmc.org/kent-county-transit-needs-assessment](http://www.gvmc.org/kent-county-transit-needs-assessment).

*Living Wage Calculator - Living Wage Calculation for Grand Rapids-Wyoming, MI*.

<https://livingwage.mit.edu/metros/24340>. Accessed 23 Dec. 2020.

“Michigan’s Class of 2019 Sets New Record for High School Graduation Rate.” *Mlive*, 3 Mar. 2020,

<https://www.mlive.com/public-interest/2020/03/michigans-class-of-2019-sets-new-record-for-high-school-graduation-rate.html>.

Mitchell, Bruce, and Juan Franco . “HOLC Redlining Maps: The Persistent Structure of Segregation and Economic Inequality.” *National Community Reinvestment Coalition*, [https://ncrc.org/wp-content/uploads/dlm\\_uploads/2018/02/NCRC-Research-HOLC-10.pdf](https://ncrc.org/wp-content/uploads/dlm_uploads/2018/02/NCRC-Research-HOLC-10.pdf).



---

National Association of Realtor. “You Can’t Live Here: The Enduring Impacts of Restrictive Covenants.” *Https://Www.Nar.Realtor/Sites/Default/Files/Documents/2018-February-Fair-Housing-Story.Pdf*.

Place, The Right. “Industry Sectors.” *The Right Place*, 23 Dec. 2020, <https://www.rightplace.org/industry-sectors>.

*Rental Burdens: Rethinking Affordability Measures | HUD USER*.  
[https://www.huduser.gov/portal/pdredge/pdr\\_edge\\_featd\\_article\\_092214.html#:~:text=HUD%20defines%20cost%2Dburdened%20families,of%20one's%20income%20on%20rent](https://www.huduser.gov/portal/pdredge/pdr_edge_featd_article_092214.html#:~:text=HUD%20defines%20cost%2Dburdened%20families,of%20one's%20income%20on%20rent). Accessed 23 Dec. 2020.

*Ride The Rapid*. <https://www.ridetherapid.org/>. Accessed 23 Dec. 2020.

Samuels, Alana. “The Role of Highways in American Poverty.” *The Atlantic*, 18 Mar. 2016, <https://www.theatlantic.com/business/archive/2016/03/role-of-highways-in-american-poverty/474282/>.

Sharkey, Patrick. *Stuck in Place: Urban Neighborhoods and the End of Progress toward Racial Equality*. University of Chicago Press, 2013.

Smith, Jeff. “Roughly 4,000 People Were Displaced from Highway Construction through Grand Rapids: An Interview with Fr. Dennis Morrow.” *Grand Rapids People’s History Project*, 4 Mar. 2016, <https://grpeopleshistory.org/2016/03/04/roughly-4000-people-were-displaced-from-highway-construction-through-grand-rapids-an-interview-with-fr-dennis-morrow/>.

---. “The Racial Segregation of Housing in Grand Rapids: Past and Present.” *Grand Rapids Institute for Information Democracy*, 15 Jan. 2019, <https://griid.org/2019/01/15/the-racial-segregation-of-housing-in-grand-rapids-past-and-present/>.

- . "Spectrum Health Community Health Needs Assessment." *Spectrum Health*, 2019, [www.spectrumhealth.org/healthier-communities/community-health-needs-assessment/spectrum-health-grand-rapids](http://www.spectrumhealth.org/healthier-communities/community-health-needs-assessment/spectrum-health-grand-rapids).
- . "The Racial Segregation of Housing in Grand Rapids: Past and Present." *Grand Rapids Institute for Information Democracy*, 15 Jan. 2019, <https://griid.org/2019/01/15/the-racial-segregation-of-housing-in-grand-rapids-past-and-present/>.
- "Untitled." *America's Health Rankings*, [https://www.americashealthrankings.org/explore/health-of-women-and-children/measure/concentrated\\_disadvantage/state/IN](https://www.americashealthrankings.org/explore/health-of-women-and-children/measure/concentrated_disadvantage/state/IN).
- "---." *City of Grand Rapids*, <https://www.grandrapidsmi.gov/Government/Departments/Budget-Office/Library/Current>.
- . <https://www.census.gov/quickfacts/fact/note/US/HSG650219>. Accessed 23 Dec. 2020.
- Your Title Here*. <https://www.census.gov/glossary/>. Accessed 23 Dec. 2020.