

An aerial photograph of a city, likely Macomb, Michigan, showing a river winding through the landscape, a large multi-story building, and surrounding residential and commercial areas. The image is partially obscured by a green diagonal overlay on the left side.

# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

DRAFT SEPTEMBER 2023



MACOMB COUNTY, MICHIGAN



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## 1.0 INTRODUCTION

Macomb County, Michigan, is a participant in the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program, HOME Investment Partnerships Program (HOME), and a recipient of Emergency Solutions Grant (ESG) funding. Since the inception of the federal CDBG program, HUD has required various reports to satisfy the grantee jurisdiction's compliance with all laws, applicable programs, and regulations, and to demonstrate the community's ability to carry out the program in a timely manner. As a condition of compliance, communities who are awarded CDBG funds are instructed by HUD to conduct an Analysis of Impediments to Fair Housing Choice (AI) under 24 Code of Federal Regulations (CFR), Section 570.904[c], of the CDBG program.

The purpose of the AI in each entitlement community nationally is to determine the possible existence of impediments to fair housing choice based upon race, color, religion, sex (including gender identity and sexual orientation), national origin, age, disability, or familial status (as referenced in the Fair Housing Act). If any impediments are identified, entitlement communities are directed to suggest necessary steps to reduce and/or eliminate barriers that prevent affirmatively furthering fair housing.

In the Fair Housing Planning Guide, HUD defines the AI as: ". . . A comprehensive review of states or entitlement jurisdiction's laws, regulations, and administrative policies, procedures and practices. The AI involves an assessment of how these laws, policies and procedures affect the location, availability and accessibility of housing and how conditions, both private and public, affect fair housing choice."

Additionally, HUD updated its requirements in a memorandum dated February 14, 2000, that stated, in part: "The Consolidated Plan regulation (24 CFR 91) requires each state and local government to submit a certification that is affirmatively furthering fair housing. This means that it will (1) conduct an analysis of impediments to fair housing choice, (2) take appropriate actions to overcome the effects of impediments identified through that analysis, and (3) maintain records reflecting the analysis and actions."

### 1.1 FAIR HOUSING CHOICE

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons. The State of Michigan has a Fair Housing law (Michigan Fair Housing Act of 1968) similar to the Federal Fair Housing Act.

Housing choice throughout the United States has yet to realize the levels of equal access guaranteed in the Civil Rights Act affecting persons who encounter discrimination based on race, color, religion, sex,



national origin, disability or familial status. Fair Housing Choice has come a long way over the past 55 years. However, recent reports show that barriers to affirmatively further fair housing still exist.

The National Fair Housing Alliance's (NFHA) 2023 Fair Housing Trend Reports provides up-to-date published findings and shows that significant barriers still exist among persons based on race, color, religion, sex, national origin, disability and familial status. Its key findings include:

- Housing discrimination persists nationwide and is severely underreported.
- In 2022 the National Fair Housing Alliance reported a total of 33,007 complaints of housing discrimination, an increase of 5.74% in complaints compared to 2021.
- Discrimination based on disability accounted for the majority (over 53%) of complaints filed.
- Equal access to affordable, quality credit continues to be a major fair lending issue throughout the United States. Underserved populations, including African Americans, Latinos, Native Americans, persons with disabilities, immigrants and women, have long been subjected to various forms of lending bias.
- Many underserved groups continue to be steered to particular neighborhoods, with housing providers lying about availability or cost of apartments for minority populations.
- Persons of color are more likely to receive subprime loans, higher cost loans, and loans with extra fees.
- There were significant increases in complaints based on sex, domestic violence, and source of income.

## 1.2 METHODOLOGY USED

The purpose of this analysis is to identify any local housing concerns and impediments to the exercise of fair housing choice in Macomb County, Michigan. Macomb County is an Urban County which is comprised of 21 local units of government including the Villages of Armada, New Haven, and Romeo; the Townships of Armada, Bruce, Chesterfield, Harrison, Lenox, Macomb, Ray, Richmond, Shelby and Washington; and the Cities of Center Line, Eastpointe, Fraser, Memphis, Mount Clemens, New Baltimore, Richmond and Utica. Inaugurated in 1982 in the CDBG program, the County became a HOME participating jurisdiction (PJ) in 1992 and formed the Macomb HOME Consortium (MHC) in 2006, together with Roseville, Sterling Heights, and Clinton Township.

This analysis attempts to identify any attitudes, barriers, institutional practices and public policies which create barriers to affirmatively further fair housing within the Macomb Urban County. Research and analysis of information regarding housing choice and restrictions was based upon review of socioeconomic and housing characteristics. Data sources included, historical United States (U.S.) Census figures (1990-2021), HUD's Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool, reports and statistics from local, regional, State and Federal agencies, Macomb County data, and interest groups. Reflecting HUD guidelines concerning "recommended contents," this analysis incorporates the background of housing choice in Macomb County; federal, state and local public policies; profiles

describing socioeconomic conditions of persons who make up Macomb County; and community services provided by the County's CDBG program. This analysis includes institutional practices that affect the level of choice available within the area's housing market.

## 2.0 COMMUNITY PROFILE

The purpose of this profile is to describe the socioeconomic characteristics of Macomb County, Michigan, which is essential to the short and long-term housing goals of the community. Socioeconomic characteristics include, but are not limited to, population size, age, gender, race, employment, housing value, tenure, and housing unit age. Compiling and examining data on these elements will help guide County officials in determining the housing needs of County residents.

Macomb County is located in southeast Michigan on the western shore of Lake St. Clair. It is a densely populated area that is heavily comprised of various industries and commerce. The entire county is approximately 484 square miles, has 32 miles of coastline, and is home to 31 miles of the Clinton River. Macomb County is surrounded by Wayne County (south), Oakland County (West), Lapeer County (northwest), and St. Clair County (northeast), and is less than 30 miles from Detroit and approximately 60 miles from Flint.

Macomb County was founded in 1818 as the third county in the State of Michigan. Originally much larger than its current size, Macomb County eventually gave way to its neighboring counties of Lapeer, Oakland, St. Clair, and Genesee. In the 17<sup>th</sup> century, the county served as a refuge for native peoples.

Historically, Macomb County thrived on trade and farming; however, the County experienced international fame when people began to take interest in mineral baths that run beneath the city of Mount Clemens within the County. While the mineral baths did not remain popular, the County continued to grow in population and is now the third most populated county in the State. Today, Macomb County employs over 400,000 residents and is comprised of industries in manufacturing, automotive, defense, health care, retail, agriculture, and more.

Today, Macomb County is committed to a policy of diversity and inclusion. Recreation and community engagement are important attributes of the County. In addition to more than 17,000 acres of park and recreational space, Macomb County offers collaborative community activities, restaurants, retail attractions, and local festivals making Macomb County an engaging place to live and work.

## 2.1 POPULATION PROFILE

### Total Population

**Table 1** illustrates population trends in Macomb County and surrounding areas over a 21-year period from 2000 through 2021. According to the 2021 U.S. Census, Macomb County, Michigan has a population of 879,123. According to the AFFH Data and Mapping Tool the current population of the Macomb County Urban County subset is 373,696, which accounts for less than half of the total population of the County.

Macomb County shows a positive population trend over the past 21 years, with a greater increase in the decade from 2000 to 2010 than from 2010 to 2021. From 2000 to 2010, the population of Macomb County increased by 6.7%. Between 2010 and 2021, Macomb County's population increased by 4.5%. Over the same time period, the population in the State of Michigan decreased then increased slightly compared to Macomb County. While Macomb County's population experienced an overall increase over the past 21 years, the State of Michigan has fluctuated over the past two decades.

**Table 1: Historical Population Trends**

Place	2000	2010	Change 2000-2010		2021	Change 2010-2021		Change 2000-2021	
			#	%		#	%	#	%
Macomb County	788,149	840,978	52,829	6.7%	879,123	38,145	4.5%	90,974	11.5%
Michigan	9,938,444	9,883,640	-54,804	-0.6%	10,062,512	178,872	1.8%	124,068	1.2%

Source: 2000, 2010 U.S. Census; 2017-2021 American Community Survey 5-Year Estimates

### Racial/Ethnic Population Breakdown

**Table 2** illustrates the current (2021) breakdown of Macomb County's total population by race and ethnicity. Due to changes in the U.S. Census data collection methods over the past 20 years, comparison by category is not always accurate. However, the recent data collection methodology has improved.

According to the 2017-2021 American Community Survey (ACS) approximately 96.2% of Macomb County's population is one race. The County has approximately 691,360 persons or 78.6% of its population that identified as White. In comparison, 106,708 persons or 12.1% of its population identified as Black or African American, while 32,978 persons or 3.8% of its population identified as having two or more races. Additionally, 2,463 persons or 0.3% of the County's population identified as being American Indian or Alaskan Indian, and 39,034 persons or 4.4% of the County's population identified as being Asian or Pacific Islander.

**Table 2: Racial Distribution**

Racial Distribution	2000	Percent of Total Population 2000	2010	Percent of Total Population 2010	Percent of Total Change, 2000-2010	2021	Percent of Total Population 2021	Percent of Total Change 2000-2021
	#	%	#	%	%	#	%	%
<b>Population of One Race</b>	<b>774,201</b>	<b>98.2%</b>	<b>823,344</b>	<b>97.9%</b>	<b>6%</b>	<b>846,145</b>	<b>96.2%</b>	<b>9.3%</b>
White	730,270	92.7%	717,973	85.4%	-2%	691,360	78.6%	-5.3%
Black or African American	21,326	2.7%	72,723	8.6%	241%	106,708	12.1%	400.4%
American Indian and Alaskan Indian	2,478	0.3%	2,646	0.3%	7%	2,463	0.3%	-0.6%
Asian or Pacific Islander	17,021	2.2%	25,242	3.0%	48%	39,034	4.4%	129.3%
Two or More Races	13,948	1.8%	17,634	2.1%	26%	32,978	3.8%	136.4%
Some Other Race	3,106	0.4%	4,760	0.6%	53%	6,580	0.7%	111.8%
Total Population	788,149	100%	840,978	100%	N/A	879,123	100%	N/A

Source: 2000, 2010 U.S. Census; 2017-2021 American Community Survey 5-Year Estimates

**Table 3** describes the racial and ethnic distribution within the CDBG and ESG jurisdiction (Urban County). As depicted, the data for the Urban County is reflective of that of the County as a whole. The Urban County is made up of predominantly White, Non-Hispanic population (86.3%). The Black, Non-Hispanic population makes up 7.2% of the Urban County population, followed by 2.6% Hispanic, and 1.9% Asian or Pacific Islander.

Additionally, the distribution of White, Non-Hispanic decreased since 1990 from 95.5% to 86.3% while Black, Hispanic, and Asian populations have increased since 1990.

**Table 4** shows that since 2000, the Hispanic Origin population has grown significantly in Macomb County. From 2000 to 2021, the County saw a 97.8% increase in the Hispanic Origin population. The State of Michigan saw a smaller increase with 66.7% in the Hispanic Origin population.

**Table 4** illustrates the change in both the County's Black or African American and White populations during this period. Since 2000, Macomb County's Black or African American population increased by 400.4% and the County's White population decreased by 5.3%. The State of Michigan's Black or African American population increased by 9.2%, while the White population increased by 2.3%. The Hispanic population across all geographies dramatically increased (66.7%).

<b>Table 3: Macomb County CDBG, ESG Jurisdiction</b>				
<b>Race/Ethnicity</b>	<b>1990</b>		<b>Current</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
White, Non-Hispanic	237,382	95.50%	322,585	86.3%
Black, Non-Hispanic	5,451	2.19%	27,046	7.2%
Hispanic	2,748	1.11%	9,539	2.6%
Asian or Pacific Islander, Non-Hispanic	1,778	0.72%	7,024	1.9%
Native American, Non-Hispanic	880	0.35%	1,006	0.3%
Two or More Races, Non-Hispanic	N/A		6,167	1.7%
Other, Non-Hispanic	N/A		329	0.1%
<b>TOTAL</b>	<b>248,239</b>	<b>99.9%</b>	<b>373,696</b>	<b>100%</b>

Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020, Data Accessed July of 2023

The **African American Population** map (Appendix A) shows the distribution of African Americans in the County. The Black or African American population is concentrated in the southern part of the County, primarily in the cities of Eastpointe and Warren, surrounding the City of Center Line. The population is also concentrated in the City of Mount Clemens, where the Black or African American population is greater than 41%. The **Hispanic or Latino Population** map (Appendix A) shows that the Hispanic or Latino population is evenly distributed throughout the county. The highest concentrations of Hispanic or Latino population is along the border of Mount Clemens and Harrison Township. Most of the municipalities in the county have less than 10% of Hispanic or Latino population. The concentration of other minority races is displayed on the **Other Minority Race Population** map (Appendix A). This map shows that most people who identified as Asian, American Indian or Alaska native, Native Hawaiian and Pacific Islander, or Two or more Races are concentrated along the border of Oakland County and in Shelby Township.

<b>Table 4: Change in Race</b>				
<b>Group</b>	<b>2000</b>	<b>2010</b>	<b>2021</b>	<b>2000-2021% Change</b>
<b>Macomb County</b>				
White	730,270	717,973	691,360	-5.3%
Black	21,326	72,723	106,708	400.4%
Hispanic Origin	12,435	19,095	24,591	97.8%
<b>Michigan</b>				
White	7,966,053	7,803,120	8,147,744	2.3%
Black	1,412,742	1,400,362	1,543,275	9.2%
Hispanic Origin	323,877	436,358	540,036	66.7%

Source: 2000 and 2010 U.S. Census; 2017-2021 American Community Survey 5-Year Estimates

## Age

According to the 2017-2021 ACS, the population of Macomb County is relatively older with roughly 57% of its population at 35 years of age or older. The median age in Macomb County is 40.9 years of age. The age and gender breakdown are shown in **Table 5**.

The **Age 18 and Under Population** map (Appendix A) demonstrates that many households dispersed throughout the County include young people. There are higher percentages of persons under the age of 18 in Macomb Township, Chesterfield Township, the City of Centerline, and the City of Eastpointe. Each of these locations have an approximate average concentration of 30% of young people. The location of elderly persons in Macomb County does not follow a strong trend. Bruce Township, Shelby Township, and Washington Township have several census tracts with high concentrations of elderly people, displaying 16% or more households with persons 65 years and older, as seen in the **Age 65 and Over Population** map (Appendix A).

Age-Cohort	2000			2010			2021		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Total Population</b>	<b>386,088</b>	<b>402,061</b>	<b>788,149</b>	<b>408,712</b>	<b>432,266</b>	<b>840,793</b>	<b>430,674</b>	<b>448,449</b>	<b>879,123</b>
Under 5 years	26,484	24,578	51,062	24,939	23,876	48,815	24,507	23,150	47,657
5 to 9 years	27,759	26,366	54,125	27,001	25,757	52,758	25,498	24,915	50,413
10 to 14 years	27,923	25,942	53,865	28,924	27,321	56,245	27,706	25,686	53,392
15 to 19 years	25,130	23,555	48,685	29,301	27,506	56,807	27,194	25,364	52,558
20 to 24 years	22,439	22,333	44,772	24,979	24,532	49,511	26,326	25,822	52,148
25 to 34 years	58,759	56,955	115,714	50,058	51,335	101,393	31,145	31,007	118,525
35 to 44 years	66,901	65,602	132,503	58,382	60,057	118,439	28,349	28,024	106,075
45 to 54 years	53,657	54,604	108,261	65,341	67,514	132,855	26,604	27,481	121,468
55 to 59 years	19,575	20,560	40,135	27,640	29,006	56,646	25,825	26,165	64,522
60 to 64 years	14,709	16,667	31,376	22,487	24,842	47,329	28,802	29,681	63,005
65 to 74 years	24,563	31,417	55,980	27,670	33,422	61,092	30,925	32,060	88,243
75 to 84 years	14,921	24,861	39,782	16,363	24,440	40,803	31,507	33,015	42,043

85 years and over	3,268	8,621	11,889	5,627	12,658	18,285	30,826	32,179	19,074
<b>Median age (years)</b>	<b>35.7</b>	<b>38.3</b>	<b>36.9</b>	<b>38.6</b>	<b>41.1</b>	<b>39.9</b>	<b>39.6</b>	<b>42.4</b>	<b>40.9</b>

Source: 2000, 2010 U.S. Census; 2017-2021 American Community Survey 5-Year Estimates

**Table 6** below details the age and gender distribution within the CDBG and ESG jurisdiction (Urban County). The data show that within the Urban County that nearly one-quarter of the population is under the age of 18, 63% is 18 years to 64 years old, and only 12.2% is 65 years or older. Additionally, according to the AFFH Data and Mapping Tool, there are 45,872 families with children within the Urban County (45.84%). Gender distribution within the Urban County is evenly divided among males and females.

<b>Table 6: Macomb County CDBG, ESG Jurisdiction</b>		
<b>Age</b>	<b>#</b>	<b>%</b>
Under 18	92,653	24.8%
18-64	235,549	63.0%
65+	45,494	12.2%
<b>Sex</b>	<b>#</b>	<b>%</b>
Male	184,221	49.3%
Female	189,475	50.7%

Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020, Data Accessed July of 2023

### Income and Poverty

According to the 2017-2021 ACS, Macomb County has a median family income of \$84,792 per year, median household income of \$67,828, with 7.7% of families falling below the federal poverty level and 10.3% of individuals falling below the federal poverty level. **Table 7** shows Macomb County has higher median incomes and per capita income compared to the State of Michigan.

<b>Table 7: Income and Poverty 2009-2017</b>					
<b>Place</b>	<b>Median Household Income</b>	<b>Median Family Income</b>	<b>Per Capita Income</b>	<b>% Families Below Poverty Level</b>	<b>% Individuals Below Poverty Level</b>
<b>Macomb County</b>	<b>\$67,828</b>	<b>\$84,792</b>	<b>\$34,880</b>	<b>7.7%</b>	<b>10.3%</b>
Michigan	\$63,202	\$80,365	\$34,768	8.9%	13.3%

Source: 2017-2021 ACS Data

According to the 2017-2021 ACS, Macomb County reported that approximately 10.3% of individuals were living below the federal poverty level. This is 3% lower than the rate of individuals living below the poverty level for the State of Michigan. The State reported approximately 13.3% of individuals were living below the federal poverty level. **Table 8** illustrates the breakdown between race and poverty level in Macomb County, according to the 2017-2021 ACS, provided by the U.S. Census Bureau. Native Hawaiian and Other Pacific Islander, and American Indian/Alaska Native share highest percentage rate

of persons living below the federal poverty level at 55.0% and 27.6%, respectively; this is closely followed by Black or African Americans at 19.4%. Hispanic or Latino persons living below the federal poverty rate in the County is at 12.4%, while those who identify as two or more races is at 13.7%.

<b>Table 8: Race and Poverty</b>		
<b>Race and Hispanic Origin</b>	<b>Below Poverty Level</b>	<b>Percent Below Poverty Level</b>
<b>One Race</b>	<b>85,035</b>	<b>9.7%</b>
White	59,016	8.6%
Black or African American	20,227	19.4%
American Indian and Alaska Native	662	27.6%
Asian	4,220	11.0%
Native Hawaiian and Other Pacific Islander	338	55.0%
Some Other Race	572	8.9%
Two or More Races	4,457	13.7%
Hispanic or Latino Origin	3,030	12.4%
White Alone, Not Hispanic or Latino	57,516	8.5%

*Source: 2017-2021 American Community Survey 5-Year Estimates*

The southern part of the County shows a greater rate of poverty as seen in the Poverty Status map (Appendix A). The City of Mount Clemens (and the area immediately surrounding it), the City of Eastpointe, and the City of Center Line have the highest rate of people whose income in the past 12 months is below the poverty level with census tracts registering a poverty rate 21% or higher. The same regions that displayed the highest levels of poverty in the Poverty Status map are also the places with the higher percentages of poverty on the Poverty Status for Minority Populations map (Appendix A). This suggests that while most of the county does not suffer from poverty, those who suffer the most are minority populations.

The **Low- and Moderate-Income Areas** map (Appendix A), indicates that the highest concentrations of low- and moderate-income persons are concentrated in the southern part of the County. A low- and moderate-income person earns less than 80% of the Area Median Income (AMI). As an "Exception Grantee," Macomb County reviews statistical information on an annual basis for all areas that have been determined to have at least 49.45% of its population with low and moderate incomes (80% of AMI). Currently there are 58 Block Groups that meet or exceed these criteria in the Urban County.

These identified areas are mainly concentrated south of M-59 in the southern part of the County. Some low- and moderate-income areas are scattered throughout the County north of M-59. These same neighborhoods have the highest percentage of minority populations in the County. The low- and moderate-income areas are consistent with places that have higher poverty rates and a higher percentage of minority populations.



### Opportunity Indicators by Race/Ethnicity

An opportunity analysis promotes the purposes of the Fair Housing Act, as described in the legislative history, and reflected in the statute and regulations. As Congress was working to pass the Fair Housing Act, Senator Phillip Hart emphasized the relationship between housing and opportunity stating, “where a family lives, where it is allowed to live is inextricably bound up with better education, better jobs, economic motivation, and good living conditions”.

Because housing is part of a community, an important component of fair housing planning is to assess how a person’s place of residence, public and private investment choices, and state and local policies relating to schools, transportation, employment, environmental health, and community development affect access to opportunity, and which individuals and groups with protected characteristics are most affected by a lack of, or inability to access, opportunity.

Addressing disparities in access to opportunity may involve a balanced approach that provides for both strategic investments in areas that lack key opportunity indicators, and also works to open up housing opportunities in areas with existing opportunity through effective mobility options and the preservation and development of affordable housing in high opportunity areas.

**Table 9** shows opportunity indicators by race/ethnicity. Of the general population, the Black or African American population in Macomb County has less access to low poverty areas than other race/ethnicity groups. When poverty level is considered, again the Black or African American population below poverty level has the least access to low poverty areas when compared to other race/ethnicity groups.

School-related policies have the potential to limit school choice or create situations where students living in concentrated areas of poverty are assigned to a less proficient school because of geography. Such situations could limit access to learning opportunities. Of the general population, the Black or African American population in Macomb County has less access to proficient schools than other race/ethnicity groups. When poverty level is considered, again the Black or African American population below poverty level has the least access to proficient schools when compared to other race/ethnicity groups.

**Table 9** shows that Asian or Pacific Islander populations in Macomb County have less access to proximate jobs while the Black or African American population has less access to the labor market than other race/ethnicity groups. When poverty level is considered, the Black or African American population below poverty level has the least access to the labor market when compared to other race/ethnicity groups.

**Table 9 - Opportunity Indicators, by Race/Ethnicity**

(Macomb County, MI CDBG, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
<b>Total Population</b>							
White, Non-Hispanic	65.24	67.94	50.81	25.68	42.86	49.04	64.27
Black, Non-Hispanic	41.75	44.91	34.35	29.23	51.35	50.67	52.88
Hispanic	58.12	63.86	45.98	27.01	45.87	52.72	63.06
Asian or Pacific Islander, Non-Hispanic	66.85	69.79	55.07	27.70	44.72	47.77	62.69
Native American, Non-Hispanic	58.96	63.33	44.64	26.00	44.92	51.15	61.49
<b>Population below federal poverty line</b>							
White, Non-Hispanic	54.14	61.79	43.29	26.94	47.68	51.89	60.56
Black, Non-Hispanic	31.42	35.59	25.46	29.82	55.22	51.57	49.08
Hispanic	35.23	56.81	30.74	28.02	47.68	59.44	59.89
Asian or Pacific Islander, Non-Hispanic	42.18	53.82	42.71	28.45	51.66	45.10	60.70
Native American, Non-Hispanic	71.52	67.74	49.87	25.88	38.35	58.30	69.14

Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020, Data Accessed July of 2023

**Table 9** shows opportunity indicators by race/ethnicity, including those related to Environmental Health. Of the general population, the Black or African American population in Macomb County has the least access to environmentally healthy neighborhoods than other race/ethnicity groups. When poverty level is considered, again the Black or African American population below poverty level has the least access to environmentally healthy neighborhoods when compared to other race/ethnicity groups.

According to the AFFH Data and Mapping Tool (data accessed in July of 2023), in the Urban County there are no Census Tracts that qualify as a R/ECAP. Census Tract 2640, which is located within the southern part of the City of Warren, is the only Census Tract in Macomb County that meets the HUD definition of R/ECAP. The City of Warren does not fall within the Macomb County CDBG entitlement because it receives its own allocation of funds.

### Education

The correlation between education, employment and income, while not necessarily a Fair Housing matter, does affect housing choice. **Table 10** illustrates the educational attainment for Macomb County and for the State of Michigan. According to the 2017-2021 ACS, 6.2% of persons in Macomb County have between a 9<sup>th</sup> and 12<sup>th</sup> grade education, with no diploma. This figure is slightly higher than the State of Michigan at 5.8%. Additionally, Macomb County shows a lower percentage of persons who have a bachelor’s degree, professional degree, or higher compared the State of Michigan. Macomb County has a higher percentage of those who have a high school diploma and those who completed some college, but do not have a degree.

**Table 10: Educational Attainment, 2021 - Population 25 years and older**

Jurisdiction	Less than 9th grade	9th to 12th grade, no diploma	High School Graduate (including equivalency)	Some college, no degree	Associate Degree	Percent Bachelor's Degree	Graduate or Professional Degree	Percent High School graduate or Higher	Percent Bachelor's Degree of Higher
<b>Macomb County</b>	3.4%	6.2%	29.4%	24.1%	10.8%	17.0%	9.2%	90.4%	26.1%
Michigan	2.6%	5.8%	28.5%	22.8%	9.7%	18.6%	12.0%	91.6%	30.6%

Source: 2017-2021 American Community Survey 5-Year Estimates

### Limited English Proficiency (LEP) and Linguistic Isolation

An individual who does not speak English as their primary language can be limited English proficient, or “LEP”. The native language of those individuals is often referred to as a LEP Language. According to the AFFH Data and Mapping Tool, in the Macomb County Urban County 3.8% of the population is LEP. This is a slight increase from 3.09% in 2000. The most common LEP Languages are Spanish (.67%), Other Indo-European Language (.51%) and Italian (.50%).

Approximately 11,936 households or 3.3% of Macomb County’s total population are linguistically isolated. The U.S. Census defines “Linguistically Isolated” as all members of the household 14 years and older having at least some difficulty speaking English in the household. Macomb County has a greater percentage of linguistically isolated households than the State of Michigan, as shown in **Table 11**. Given that the Hispanic population of Macomb County has been one of the fastest growing segments of the population, linguistic isolation could be more common in the future if trends continue.

**Table 11: Linguistic Isolation**

Jurisdiction	Total Households	Total English Only Speaking Households	Total Spanish Speaking Households	Linguistically Isolated	Russian, Polish, or other Slavic languages:	Linguistically Isolated	Other Indo-European languages	Linguistically Isolated	Total Asian and Pacific Speaking Households	Linguistically Isolated	Total Arabic Speaking Households	Linguistically Isolated	Total Other Speaking Language Households	Linguistically Isolated	Total Linguistically Isolated Households	Total Percent of Linguistically Isolated Households
<b>Macomb County</b>	358,011	303,946	6,855	872	6,599	1,654	13,968	2,350	6,870	1,685	9,957	2,828	9,816	2,547	11,936	3.3%
Michigan	4,051,798	3,617,965	130,329	17,355	29,271	6,393	71,454	8,349	77,721	15,292	61,718	11,830	63,340	5,999	65,218	1.6%

Source: 2021 ACS Data

## Disability

According to the 2017-2021 ACS 5-Year Estimates, disabilities are categorized into six types: hearing difficulty, vision difficulty, cognitive ability, ambulatory difficulty, self-care difficulty, and independent living difficulty. According to the 2017-2021 ACS 5-Year Estimates, approximately 121,157 or 13.9% of people in Macomb County reported having a disability. The majority (61,562 people or 50.8%) of this population is between 18 and 64 years of age.

Physically disabled persons are those having an impairment which impedes their ability to function independently. According to the 2017-2021 ACS 5-Year Estimates, the adult population between the ages of 18 and 64 is 540,512. Persons who have a physical disability may suffer from a hearing difficulty, vision difficulty, or an ambulatory difficulty. According to the same ACS dataset, there are approximately 49,012 adults (9.1%) between the ages of 18 and 64 who have a physical disability. These persons may also have a cognitive, self-care, and independent living impairment as well, and are also included in the developmentally disabled count.

The ACS defines disability as a long-lasting physical, mental, or emotional condition. Persons who have a developmental disability may suffer from a cognitive difficulty, a self-care difficulty, or an independent living difficulty. According to the ACS, this condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home or to work at a job or place of business. According to the ACS, 62,565 persons, or 11.6% of people, between the ages of 18 and 64 years have a developmental disability. These persons may also have a hearing, vision, and ambulatory impairment as well, and are also included in the physically disabled count.

The **Disability Status** map (Appendix A) shows the distribution of persons with a physical or developmental disability in the County. The population of disabled persons is not concentrated in a particular region of the county, but the map shows higher percentages of disabled persons in Ray township, Lenox Township, the City of Utica, and the City of Eastpointe.

**Table 12** shows disabilities by type in the Macomb County Urban County. The three most prevalent disability types in the Urban County are ambulatory difficulty (6.5%), cognitive difficulty (4.9%), and independent living difficulty (4.8%). Other disability types represented include hearing difficulty (3.1%), self-care difficulty (2.5%), and vision difficulty (1.6%). When compared to the County as a whole, the Urban County area has comparative percentages of persons with a disability of all types.

<b>Table 12: Disability by Type</b>		
<b>(Macomb County, MI CDBG, ESG) Jurisdiction</b>		
<b>Disability Type</b>	<b>#</b>	<b>%</b>
Hearing difficulty	10,914	3.1%
Vision difficulty	5,597	1.6%
Cognitive difficulty	17,341	4.9%
Ambulatory difficulty	22,884	6.5%
Self-care difficulty	8,878	2.5%
Independent living difficulty	16,816	4.8%

Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020, Data Accessed July of 2023

### National Origin

According to the AFFH Data and Mapping Tool, in Macomb County Urban County, the most common countries of National Origin, outside of the United States of America, are Iraq (0.83%), Italy (0.76%), Canada (0.63%), India (0.57%), and Albania (0.55%).

## 2.2 HOUSING PROFILE

### Housing Inventory

According to the 2000 U.S. Census, there were a total of 320,276 housing units in Macomb County, 309,203 or approximately 96% of the units were occupied while 5.9% or 11,073 of the units were vacant. However, according to the 2017-2021 ACS, there were a total of 371,200 housing units in Macomb County, 358,011, or approximately 92.1% of these units were occupied. Traditionally, residential vacancy rates have been used as an indicator of equilibrium between supply and demand in a given housing market. **Table 13** illustrates the Housing Tenure in 2000, 2010, and 2021.

<b>Table 13: Housing Tenure</b>				
<b>Housing Tenure</b>	<b>Census 2000</b>	<b>Census 2010</b>	<b>ACS 2021</b>	<b>Change 2000-2021</b>
<b>Owner Occupied</b>	243,964	261,291	269,445	25,481
<b>Renter Occupied</b>	65,239	69,031	88,566	23,327
Vacant	11,073	25,205	13,189	2,116
Homeowner Vacancy Rate	1.2%	2.5%	3.6%	2.4%
Rental Vacancy Rate	4.7%	7.7%	4.3%	-0.4%
Total Housing Units	320,276	355,527	371,200	50,924

Source: 2000, 2010 U.S. Census; 2017-2021 American Community Survey 5-Year Estimates

As shown in **Table 13**, Macomb County reported a total of 358,011 occupied housing units in 2021. Of the 358,011 occupied housing units, 269,445 housing units were owner occupied. Similarly, 88,566 units

were renter occupied. The vast majority of owner-occupied housing units within the County are single-family detached units (approximately 83.4%). Similarly, most renter-occupied housing units within the County are single-family detached units (approximately 28.1%) closely followed by units with 10 or more apartments (approximately 27.5%).

The percent of rental units by Census Tract can be seen on the **Renter Occupied Units** map (Appendix A). Municipalities in the southern half of the county show the greatest percentage of renter-occupied housing units, with most municipalities displaying areas with percentages of 51% or higher. This is also the area with a high number of low- and moderate-income households, suggesting that homeownership is not a viable option for some residents of this area.

**Table 14: Physical Housing Characteristics for Occupied Housing Units**

Occupied Housing Units	Percent of Occupied Housing Units	Owner Occupied Housing Units	Renter-Occupied Housing Units
<b>Units in Structure</b>	<b>351,715</b>	<b>261,678</b>	<b>90,037</b>
1, detached	69.2%	218,244	25,277
1, attached	9.8%	26,162	8,268
2 apartments	0.7%	422	2,028
3 or 4 apartments	3.1%	2,742	7,987
5 to 9 apartments	6.2%	3,145	18,512
10 or more apartments	7.7%	2,369	24,762
Mobile Home or other type of housing	3.4%	8,594	3,203

Source: 2017-2021 American Community Survey 5-Year Estimates

### Age of Structure

The age of a dwelling unit is a factor used to evaluate the structural quality of the unit. The average industry standard for the life span of a single-family dwelling is generally 50 years. However, this typical life span often depends on the quality of the original construction and continued maintenance of the unit. Using this standard, some homes found within the County constructed prior to 1970 may be approaching the end of their utility.

**Table 15** identifies the age of year-round residential structures. The majority of the units in Macomb County were built from 1950 to 1979. This is typical of many regions nationwide as the United States experienced a housing boom that began after World War II.

When considering the average life span of a dwelling unit, the homes built before 1970 will have already reached their 50-year life span. Thus, over 43% of the County’s housing units have reached their life span. These homes require regular maintenance to remain structurally sound.

In **Table 15**, only 6.1% of units were built since 2010. The primary reason for a decrease in construction of new homes in the County is the potential redevelopment of older residential structures. Most of the

County's future population will be served by existing residential units, redevelopment of existing units, and infill housing.

Macomb County	Number of Total Housing Units	Percent of Total Housing Units
Year Built		
<b>Total Housing Units</b>	<b>371,200</b>	<b>100%</b>
Built 2020 or Later	2,956	0.8%
Built 2010 to 2019	19,520	5.3%
Built 2000 to 2009	40,091	10.8%
Built 1990 to 1999	51,155	13.8%
Built 1980 to 1989	39,167	10.6%
Built 1970 to 1979	58,787	15.8%
Built 1960 to 1969	67,775	18.3%
Built 1950 to 1959	59,480	16.0%
Built 1940 to 1949	16,531	4.5%
Built 1939 or earlier	15,738	4.2%

Source: 2017-2021 American Community Survey 5-Year Estimates

### Risk of Lead-Based Paint

The risk of lead-based paint hazards within Macomb County is estimated in **Table 16**. Because the actual number of housing units in the County with lead-based paint is not available, an assumption must be made. For the purposes of this plan, a housing unit built before 1980 is presumed to have a higher risk of lead-based paint. Therefore, **Table 16** shows the total number of owner-occupied and renter-occupied units that were built before 1980, as well as those built before 1980 with children present. The data for **Table 16** is from the 2017-2021 ACS and 2009-2013 CHAS provided by HUD.

As shown in **Table 16**, 152,866 or 58.5% of owner-occupied housing units in the County were built prior to 1980, of which only 17,245 units or 7.9% were built before 1980 and have children present. For renter-occupied housing units, 54,627 units or 60.7% were built prior to 1980, while 13,244 or 6.1% were built prior to 1980 and have children present.

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
<b>Total Number of Units Built Before 1980</b>	<b>152,866</b>	<b>58.5%</b>	<b>54,627</b>	<b>60.7%</b>
Housing Units built before 1980 with children present	17,245	7.9%	13,244	6.1%

Source: 2017-2021 ACS (Total Units), 2013-2017 CHAS (Units with Children)

## Number of Households and Types

**Table 17** below provides the number and type of households by AMI. As the data identifies below, the largest number of households are in the greater than 100% AMI group, with 136,090 households. The second largest group is the 50-80% AMI group (42,935). Approximately 37% of all households in Macomb County are below 80% of AMI. The remaining income groups in Macomb County contain a similar number of households.

Small family households are households that have a family with two to four members. The largest number of small family households reside in the >100% AMI group (73,835). The majority of the remaining income groups have a much smaller, similar distribution of the number of small family households (between 8,000 and 14,000 households).

Large family households are households with families with five or more members. Among the income groups below 80% AMI, the 50-80% AMI group contains the largest number of large family households at 2,968. The smallest number of large family households belongs to the 0-30% AMI group.

**Table 17** also provides data on households that contain at least one person considered to be elderly. The data reveals that among income groups below 80% AMI, the largest number of households containing a person over the age of 62 and younger than 74 is within the 50-80% AMI group (11,134). In addition, the households between 50%-80% AMI also contain the largest number of households containing a person 75 years or older with 8,237 households (of the income groups below 80%).

Finally, data provided in **Table 17** illustrates the number of households with one or more children 6 years old or younger. Among the household income groups identified, the largest number of children 6 years or younger reside in homes above 100% AMI (12,485). The second largest number of households with children 6 years old or younger is within the 50-80% AMI group (6,085).

<b>Table 17: Number of Households</b>					
	<b>0-30% HAMFI</b>	<b>&gt;30-50% HAMFI</b>	<b>&gt;50-80% HAMFI</b>	<b>&gt;80-100% HAMFI</b>	<b>&gt;100% HAMFI</b>
<b>Total Households*</b>	<b>25,845</b>	<b>28,860</b>	<b>42,935</b>	<b>27,700</b>	<b>136,090</b>
Small Family Households*	8,134	8,634	14,050	10,005	73,835
Large Family Households*	1,649	2,043	2,968	2,449	13,000
Household contains at least one person 62-74 Years of Age	5,744	6,410	11,134	7,153	28,248
Household contains at least one-person age 75 or older	3,990	6,466	8,237	3,963	8,839
Households with one or more children 6 years old or younger	3,830	4,123	6,085	3,458	12,485

\* The highest income category for these family types is >80% HAMFI; Source: HUD IDIS Output, September 2023: 2013-2017 CHAS



## Housing Problems

**Table 18** displays the number of households with housing problems by tenure and AMI. As shown in **Table 18**, among the “housing problem” categories, households within Macomb County are most commonly impacted by severe housing cost burden (greater than 50% of income) and housing cost burden (greater than 30% of income).

Housing Problem categories are defined below:

“Substandard Housing – lacking complete plumbing or kitchen facilities” is defined as a household without hot and cold piped water, a flush toilet and a bathtub or shower, and kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. The second housing problem identified is households living in overcrowded conditions.

There are two forms of overcrowding defined by HUD:

- Severely overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- Overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

The final housing problem identified is cost burden. Cost burden is a fraction of a household’s total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Cost burden is broken into two categories based on severity:

- Severe housing cost burden greater than 50% of income
- Housing cost burden greater than 30% of income

**Table 18** identifies 895 renter households and 479 owner households who live in substandard housing.

As shown in **Table 18**, 1,654 renter households are experiencing some form of overcrowding while owner occupied households are experiencing some form of overcrowding.

As shown in **Table 18**, households tenured by renters within the 0%-30% AMI group are experiencing higher rates of cost burden than those households with higher incomes, and households tenured by owners within the >50-80% AMI income group are experiencing higher rates of cost burden than other owner income groups.

Renters and owners appear to be similarly affected by the cost of housing within Macomb County. Of the 60,931 households experience some level of cost burden (a 9% decrease from the previous Macomb County AI report, issued 2019), of which 29,058 are renters and 31,873 are owners.

<b>Table 18: Housing Problems</b>										
<b>Housing Problems</b>	<b>Renter</b>					<b>Owner</b>				
	<b>0-30% AMI</b>	<b>&gt;30-50% AMI</b>	<b>&gt;50-80% AMI</b>	<b>&gt;80-100% AMI</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>&gt;30-50% AMI</b>	<b>&gt;50-80% AMI</b>	<b>&gt;80-100% AMI</b>	<b>Total</b>
Substandard Housing - Lacking complete plumbing or kitchen facilities	325	160	295	115	895	42	190	207	40	479
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	220	65	85	79	449	4	89	44	29	166
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	440	343	294	128	1,205	175	270	484	167	1,096
Housing cost burden greater than 50% of income (and none of the above problems)	9,150	4,235	958	160	14,503	7,193	4,330	2,512	429	14,464
Housing cost burden greater than 30% of income (and none of the above problems)	1,159	6,078	6,013	1,305	14,555	1,853	5,068	7,149	3,339	17,409
Zero/negative Income (and none of the above problems)	1,007	0	0	0	1,007	1,177	0	0	0	1,177

Source: HUD IDIS Output, September 2023: 2013-2017 CHAS

**Additional Housing Problems**

**Table 19** displays the number of households with no housing problems, one or more housing problems, and negative income by tenure and HUD Adjusted Median Family Income (HAMFI). The data source is the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As the data reveals in **Table 19**, renters in the 0-30% AMI group experience the highest rate of one or more of the housing problems identified. A total of 10,130 renter households below 30% AMI experience some form of housing problem. Among owner households, the 0-30% AMI group has the highest number of households (7,408) with one or more of housing problems.

Additionally, a small number of households (2,184) within the 0-30% AMI group have negative income but have none of the other four identified housing problems.

<b>Table 19: Additional Housing Problems</b>										
	<b>RENTER</b>					<b>Owner</b>				
	<b>0-30% AMI</b>	<b>&gt;30-50% AMI</b>	<b>&gt;50-80% AMI</b>	<b>80-100% AMI</b>	<b>TOTAL</b>	<b>0-30% AMI</b>	<b>&gt;30-50% AMI</b>	<b>&gt;50-80% AMI</b>	<b>80-100% AMI</b>	<b>TOTAL</b>
<b>Number of Households</b>										
Having 1 or more of four housing problems	10,130	4,795	1,619	488	17,032	7,408	4,885	3,243	648	16,184
Having none of four housing problems	3,588	8,173	13,149	7,944	32,854	2,524	11,029	24,935	18,625	57,113
Household has negative income, but none of the other housing problems	1,007	0	0	0	1,007	1,177	0	0	0	1,177

*Note: Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden*  
*Source: HUD IDIS Output, September 2023: 2013-2017 CHAS*

**Cost Burden > 30% and > 50%**

**Tables 20** and **21** display the number of households with housing cost burdens more than 30% of income and more than 50% of income, respectively, by household type, tenancy, and household income (expressed as a percentage of AMI). Households are broken into four categories:

- Small related – Family households with two to four related members
- Large related – Family households with five or more related members
- Elderly – A household whose head, spouse, or sole member is a person who is at least 62 years of age
- Other – All other households

As shown in **Table 20**, the category experiencing the most significant cost burden greater than 30% of income are households defined as “Small Related”. The burden is slightly higher among renters (10,606) than owners (8,627).

For renter households, the 0 - 30% AMI Income group has the highest total number of households with a cost burden greater than 30% of income with 11,220 households. Among owner households, the 50% - 80% AMI group has the highest total number of households with a cost burden greater than 30% of income with 9,804 households.

<b>Table 20: Cost Burden &gt; 30%</b>								
	<b>RENTER</b>				<b>OWNER</b>			
	<b>0-30% AMI</b>	<b>&gt;30- 50% AMI</b>	<b>&gt;50- 80% AMI</b>	<b>TOTAL</b>	<b>0-30% AMI</b>	<b>&gt;30- 50% AMI</b>	<b>&gt;50- 80% AMI</b>	<b>TOTAL</b>
<b>Number of Households</b>								
Small Related	4,352	3,868	2,386	10,606	2,475	2,726	3,426	8,627
Large Related	759	827	275	1,861	714	724	1,035	2,473
Elderly	2,811	2,692	2,145	7,648	3,982	4,599	3,840	12,421
Other	3,298	3,374	2,338	9,010	1,987	1,582	1,503	5,072
Total Need by Income	11,220	10,761	7,144	29,125	9,158	9,631	9,804	28,593

HUD IDIS Output, September 2023: 2013-2017 CHAS

As shown in **Table 21**, the category most commonly experiencing severe cost burden greater than 50% of income are households defined as “Small Related”. Approximately 10,082 of the “Small Related” households experience a cost burden greater than 50% of income. The burden is similar among renters (5,610) and owners (4,472).

For renter households, the 0 - 30% AMI Income group has the highest total number of households with a cost burden greater than 50% of income with 9,954 households. Among owner households, again, the 0 - 30% AMI group has the highest total number of households with a cost burden greater than 50% of income (7,280 households).

<b>Table 21: Cost Burden &gt; 50%</b>								
	<b>RENTER</b>				<b>Owner</b>			
	<b>0-30% AMI</b>	<b>&gt;30- 50% AMI</b>	<b>&gt;50- 80% AMI</b>	<b>TOTAL</b>	<b>0-30% AMI</b>	<b>&gt;30- 50% AMI</b>	<b>&gt;50- 80% AMI</b>	<b>TOTAL</b>
<b>Number of Households</b>								
Small Related	3,913	1,519	178	5,610	2,105	1,468	899	4,472
Large Related	734	214	25	973	609	395	245	1,249
Elderly	2,253	1,264	660	4,177	2,968	1,768	928	5,664
Other	3,054	1,314	199	4,567	1,598	778	454	2,830
Total Need by Income	9,954	4,311	1,062	15,327	7,280	4,409	2,526	14,215

HUD IDIS Output, September 2023: 2013-2017 CHAS

### Crowding

**Table 22** displays the number of households that are overcrowded, defined as households with more than one person per room, excluding bathrooms, porches, foyers, halls, or half-rooms. The data is displayed by household type, tenancy, and household income (expressed as a percentage of AMI).

As shown in **Table 22**, overcrowding is slightly unequally distributed among renter households (1,693) and owner households (1,263).

When accounting for income, renter households in the 0-30% AMI experience the highest number of crowding with 675 households. Among renters, issues with crowding tends to decrease as income increases.

Among owner-occupied households, the households with incomes between 50-80% AMI have the highest rate of crowding issues (532).

<b>Table 22: Crowding</b>										
Type of Households	RENTER					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	80-100% AMI	TOTAL	0-30% AMI	>30-50% AMI	>50-80% AMI	80-100% AMI	TOTAL
	Number of Households									
Single Family Households	545	383	310	102	1,340	144	214	383	155	896
Multiple, Unrelated Family Households	90	30	60	40	220	35	144	149	39	367
Other, Non-Family Households	40	15	14	64	133	0	0	0	0	0
Total Need by Income	675	428	384	206	1,693	179	358	532	194	1,263

*Note: Crowding is more than one person per room  
HUD IDIS Output, September 2023: 2013-2017 CHAS*

### Disproportionately Greater Needs: Housing Problems

A disproportionately greater need exists when the members of racial or ethnic group at a certain income level experience housing problems at a greater rate (10 percentage points or higher) than the income level as a whole. For example, assume that 60% of all low-income households within a jurisdiction have a housing problem and 70% of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of this assessment is to analyze the

relative level of need for each race and ethnic category, the data also provide information for the jurisdiction as a whole that can be useful in describing overall need.

This section has four tables that capture the number of housing problems by income, race, and ethnicity. Each table provides data for a different income level (0–30%, 30–50%, 50–80%, and 80–100% AMI).

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### 0% - 30% of Areas Median Income

Of all the income levels within Macomb County, households within the 0%-30% AMI category have the second highest number of households with one or more of four housing problems (20,559 households), but the highest percentage with one or more of four housing problems. As shown in **Table 23**, when considering race, White and Black/African American households have the highest number of households with housing problems with 15,568 and 4,004 households, respectively.

In terms of disproportionate need, the American Indian, Alaska Native (100%) racial or ethnic groups have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

**Table 23: 0% - 30% of Area Median Income**

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
<b>Jurisdiction as a whole</b>	<b>20,559</b>	<b>79.52%</b>	<b>3,112</b>	<b>12.04%</b>	<b>2,184</b>	<b>8.45%</b>	<b>25,855</b>
White	15,568	78.79%	2,563	12.97%	1,629	8.24%	19,760
Black/African American	4,004	82.95%	434	8.99%	389	8.06%	4,827
Asian	344	79.26%	80	18.43%	10	2.30%	434
American Indian, Alaska Native	89	100.00%	0	0.00%	0	0.00%	89
Pacific Islander	0	0.00%	0	0.00%	0	0.00%	0
Hispanic	186	65.49%	43	15.14%	55	19.37%	284

Source: HUD IDIS Output, September 2023: 2013-2017 CHAS

\*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30% - 50% of Areas Median Income

Of all the income levels within Macomb County, households within the 30%-50% AMI category have the highest number of households with one or more of four housing problems (20,808 households), closely leading the 0-30% AMI income category. As shown in **Table 24**, when considering race, White and Black/African American households have the highest number of households with housing problems with 15,798 and 3,214 households, respectively.

In terms of disproportionate need, the Black/African American (87.24%) and Hispanic (83.32%) racial or ethnic groups have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

**Table 24: 30% - 50% of Area Median Income**

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
<b>Jurisdiction as a whole</b>	<b>20,808</b>	<b>72.11%</b>	<b>8,049</b>	<b>27.89%</b>	<b>0</b>	<b>0.00%</b>	<b>28,857</b>
White	15,798	68.97%	7,108	31.03%	0	0.00%	22,906
Black/African American	3,214	87.24%	470	12.76%	0	0.00%	3,684
Asian	479	76.89%	144	23.11%	0	0.00%	623
American Indian, Alaska Native	110	69.18%	49	30.82%	0	0.00%	159
Pacific Islander	15	0.00%	0	0.00%	0	0.00%	15
Hispanic	784	83.32%	157	16.68%	0	0.00%	941

Source:

HUD IDIS Output, September 2023: 2013-2017 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**50% - 80% of Areas Median Income**

Of all the income levels within Macomb County, households within the 50%-80% AMI category have the third highest number of households with one or more of four housing problems (18,033 households). As shown in **Table 25**, when considering race, White and Black/African American households have the highest number of households with housing problems with 14,243 and 2,580 households, respectively.

In terms of disproportionate need, the American Indian, Alaska Native (90.0%) racial group has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

**Table 25: 50% - 80% of Area Median Income**

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
<b>Jurisdiction as a whole</b>	<b>18,033</b>	<b>42.00%</b>	<b>24,903</b>	<b>58.00%</b>	<b>0</b>	<b>0.00%</b>	<b>42,936</b>
White	14,243	40.40%	21,008	59.60%	0	0.00%	35,251
Black/African American	2,580	49.48%	2,634	50.52%	0	0.00%	5,214
Asian	398	47.89%	433	52.11%	0	0.00%	831
American Indian, Alaska Native	72	90.00%	8	10.00%	0	0.00%	80
Pacific Islander	20	0.00%	0	0.00%	0	0.00%	20
Hispanic	372	39.96%	559	60.04%	0	0.00%	931

Source:

HUD IDIS Output, September 2023: 2013-2017 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%



### 80% - 100% of Areas Median Income

Of all the income levels within Macomb County, households within the 80%-100% AMI category have the lowest number of households with one or more of four housing problems (5,784 households). As shown in **Table 26**, when considering race, White and Black/African American households have the highest number of households with housing problems with 4,653 and 759 households, respectively.

In terms of disproportionate need, no racial or ethnic group has a rate of housing problems that is a full 10 percentage points higher than the jurisdiction as a whole.

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	5,784	20.86%	21,944	79.14%	0	0.00%	27,728
White	4,653	20.14%	18,449	79.86%	0	0.00%	23,102
Black/African American	759	25.27%	2,245	74.73%	0	0.00%	3,004
Asian	129	30.79%	290	69.21%	0	0.00%	419
American Indian, Alaska Native	4	6.25%	60	93.75%	0	0.00%	64
Pacific Islander	0	0.00%	115	0.00%	0	0.00%	115
Hispanic	138	19.63%	565	80.37%	0	0.00%	703

Source:

HUD IDIS Output, September 2023: 2013-2017 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### Summary of Housing Problems by AMI and Race

Of all households in the 0%-30% AMI category, 79.52% have one or more of four housing problems. In terms of disproportionate need, the American Indian, Alaska Native (100%) racial or ethnic groups have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Of all households in the 30%-50% AMI category, 72.11% have one or more of four housing problems. In terms of disproportionate need, the Black/African American (87.24%) and Hispanic (83.32%) racial or ethnic groups have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Of all households in the 50%-80% AMI category, 42.00% have one or more of four housing problems. In terms of disproportionate need, the American Indian, Alaska Native (90.0%) racial group has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Of all households in the 80%-100% AMI category, 20.86% have one or more of four housing problems. In terms of disproportionate need, no racial or ethnic group has a rate of housing problems that is a full 10

percentage points higher than the jurisdiction as a whole, though it should be noted that Asian households are close at 30.79%.

**Disproportionately Greater Need: Severe Housing Problems**

As noted in the previous section, a disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

Severe housing problems include:

- Severely overcrowded households with more than 1.5 persons per room, not including bathrooms, porches, foyers, halls, or half-rooms
- Households with severe cost burden of more than 50% of income

This section has four Tables that capture the number of severe housing problems by income, race, and ethnicity. Each Table provides data for a different income level (0–30%, 30–50%, 50–80%, and 80–100% AMI). The Default Data Source is the Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

**0% - 30% of Areas Median Income**

Of all the income levels within Macomb County households within the 0%-30% AMI category have the highest number of households experiencing severe housing problems (17,538 households). As shown in **Table 27**, when considering race, White and Black/African American households have the highest number of households with severe housing problems with 13,158 and 3,573 households, respectively.

In terms of disproportionate need, the American Indian, Alaska Native (84.27%) ethnic group has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

**Table 27: 0% - 30% of Area Median Income**

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
<b>Jurisdiction as a whole</b>	<b>17,538</b>	<b>67.89%</b>	<b>6,112</b>	<b>23.66%</b>	<b>2,184</b>	<b>8.45%</b>	<b>25,834</b>
White	13,158	66.61%	4,966	25.14%	1,629	8.25%	19,753
Black/African American	3,573	74.04%	864	17.90%	389	8.06%	4,826
Asian	284	66.36%	134	31.31%	10	2.34%	428
American Indian, Alaska Native	75	84.27%	14	15.73%	0	0.00%	89
Pacific Islander	0	0.00%	0	0.00%	0	0.00%	0
Hispanic	156	54.74%	74	25.96%	55	19.30%	285

Source: HUD IDIS Output, September 2023: 2013-2017 CHAS  
 \*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**30% - 50% of Areas Median Income**

Of all the income levels within Macomb County, households within the 30%-50% AMI category have the second highest number of households experiencing severe housing problems (9,680 households). As shown in **Table 28**, when considering race, White and Black/African American households have the highest number of households with severe housing problems with 7,129 and 1,598 households, respectively.

In terms of disproportionate need, the Asian racial group (55.48%) and Hispanic ethnic groups (47.38%) have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole. Black/African American racial groups nearly have a disproportionate need at 43.33%.

**Table 28: 30% - 50% of Area Median Income**

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	9,680	33.52%	19,202	66.48%	0	0.00%	28,882
White	7,129	31.12%	15,777	68.88%	0	0.00%	22,906
Black/African American	1,598	43.33%	2,090	56.67%	0	0.00%	3,688
Asian	349	55.48%	280	44.52%	0	0.00%	629
American Indian, Alaska Native	10	6.33%	148	93.67%	0	0.00%	158
Pacific Islander	0	0.00%	15	0.00%	0	0.00%	15
Hispanic	443	47.38%	492	52.62%	0	0.00%	935

Source: HUD IDIS Output, September 2023: 2013-2017 CHAS  
 \*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**50% - 80% of Areas Median Income**

Of all the income levels within Macomb County, households within the 50%-80% AMI category have the third highest number of households experiencing severe housing problems (4,862 households). As shown in **Table 29**, when considering race, White and Black/African American households have the highest number of households with severe housing problems with 4,197 and 335 households, respectively.

In terms of disproportionate need, no racial or ethnic group has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

**Table 29: 50% - 80% of Area Median Income**

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
<b>Jurisdiction as a whole</b>	<b>4,862</b>	<b>11.32%</b>	<b>38,084</b>	<b>88.68%</b>	<b>0</b>	<b>0.00%</b>	<b>42,946</b>
White	4,197	11.91%	31,034	88.09%	0	0.00%	35,231
Black/African American	335	6.46%	4,850	93.54%	0	0.00%	5,185
Asian	149	18.02%	678	81.98%	0	0.00%	827
American Indian, Alaska Native	14	17.50%	66	82.50%	0	0.00%	80
Pacific Islander	20	0.00%	0	0.00%	0	0.00%	20
Hispanic	77	8.28%	853	91.72%	0	0.00%	930

Source:

HUD IDIS Output, September 2023: 2013-2017 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**80% - 100% of Areas Median Income**

Within Macomb County, households within the 80%-100% AMI category have the lowest number of households that experience one or more of the four severe housing problems (1,136 households). As shown in **Table 30**, White and Black/African American households have the highest number of households with severe housing problems with 947 and 114 households, respectively.

In terms of disproportionate need, there are no racial or ethnic groups that have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

**Table 30: 80% - 100% of Area Median Income**

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
<b>Jurisdiction as a whole</b>	<b>1,136</b>	<b>4.10%</b>	<b>26,569</b>	<b>95.90%</b>	<b>0</b>	<b>0.00%</b>	<b>27,705</b>
White	947	4.10%	22,134	95.90%	0	0.00%	23,081
Black/African American	114	3.78%	2,900	96.22%	0	0.00%	3,014
Asian	19	4.43%	410	95.57%	0	0.00%	429
American Indian, Alaska Native	4	6.25%	60	93.75%	0	0.00%	64
Pacific Islander	0	0.00%	115	0.00%	0	0.00%	115
Hispanic	8	1.15%	690	98.85%	0	0.00%	698

Source:

HUD IDIS Output, September 2023: 2013-2017 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**Summary of Severe Housing Problems by AMI and Race**

Of all households in the 0%-30% AMI category, 67.89% have one or more severe housing problems. In terms of disproportionate need, the American Indian, Alaska Native (84.27%) ethnic group has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Of all households in the 30%-50% AMI category, 33.52% have one or more severe housing problems. In terms of disproportionate need, the Asian racial group (55.48%) and Hispanic ethnic groups (47.38%) have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole. Black/African American racial groups nearly have a disproportionate need at 43.33%.

Of all households in the 50%-80% AMI category, 11.32% have one or more severe housing problems. In terms of disproportionate need, no racial or ethnic group has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Of all households in the 80%-100% AMI category, 4.10% has one or more severe housing problems. There are no racial or ethnic groups that have a rate that is 10 percentage points higher than the household rate as a whole.

**Disproportionately Greater Need: Housing Costs Burdens**

Again, a disproportionately greater need exists when the members of racial or ethnic group at a certain income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

**Table 31** displays cost burden information for Macomb County and each racial and ethnic group, including no cost burden (less than 30%), cost burden (30-50%), severe cost burden (more than 50%), and no/negative income. The default data source for this data is the Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As the data in **Table 31** indicate, there are a large number of households are cost burdened within their current housing situation (68,310). White households have the highest number of cost burdened households within the Macomb County with 53,508 households. Black/African American households are second with 10,444 households. Of the homes that are cost burdened, a high number of these households are severely cost burdened. Approximately 44% of cost burdened households are considered to be severely cost burdened within Macomb County.

<b>Table 31: Housing Cost Burdens by Race</b>									
Race	No Cost Burden (<=30%)		Cost Burden (30-50%)		Severe Cost Burden (>50%)		No/Negative Income		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	190,914	73.02%	37,770	14.45%	30,540	11.68%	2,233	0.85%	261,457
White	165,240	74.97%	30,023	13.62%	23,485	10.66%	1,664	0.75%	220,412

Black/African American	14,605	57.41%	5,230	20.56%	5,214	20.50%	389	1.53%	25,438
Asian	4,864	77.17%	689	10.93%	730	11.58%	20	0.32%	6,303
American Indian, Alaska Native	312	52.79%	190	32.15%	89	15.06%	0	0.00%	591
Pacific Islander	145	90.63%	15	9.38%	0	0.00%	0	0.00%	160
Hispanic	3,554	70.03%	904	17.81%	562	11.07%	55	1.08%	5,075

Source: HUD IDIS Output, September 2023: 2013-2017 CHAS

Within Macomb County, 73.02% of households do not presently experience cost burden, while 14.45% experience cost burden, 11.68% experience severe cost burden and 0.85% have no/negative income.

Of all households within Macomb County 14.45% are cost burdened (30-50%). People in the American Indian, Alaska Native racial category (32.15%) experiences a cost burden in a disproportionate percentage (greater than 10%) than the jurisdiction as a whole.

Of all households within Macomb County, 11.68% experience severe cost burden (>50%). In comparison to all households as a whole, no racial or ethnic group experiences severe cost burden in a disproportionate percentage (greater than 10%) than the jurisdiction as a whole.

Of all households within Macomb County, 0.85% (less than 1%) has no/negative income. There are no racial or ethnic groups that experiences no/negative income to a disproportionate degree (greater than 10%) than the jurisdiction as a whole.

### Disproportionate Housing Needs in Urban County

**Table 32** shows the disproportionate housing needs for Macomb County Urban County. For purposes of this analysis, disproportionate housing needs are those that are 10 percentage points higher than for the geography (i.e., county or region) as a whole.

### Housing Problems

On average, 26% of households in Macomb County Urban County experience any one of four housing problems. As shown, nearly half (43.42%) of Black households and nearly two-thirds of Native American (60.70%) households in Macomb County Urban County experience housing problems.

In both Macomb County Urban County and the greater Detroit-Warren-Dearborn Region, the occurrence of housing problems is greater in non-family households and households with five or more people. In both Macomb County Urban County and the greater Detroit-Warren-Dearborn Region, severe housing problems are least prevalent in White households; however, severe housing problems are most prevalent in Black/African American households. Black, Hispanic, and Other households generally have higher percentages of severe housing problems than other race/ethnicity groups.

Based on the data provided in **Table 32**, disproportionate housing needs may exist for households in the Black/African American and Native American racial groups, as well as for non-family households.

<b>Table 32: Demographics of Households with Disproportionate Housing Needs (Macomb County, MI CDBG, ESG) Jurisdiction</b>			
<b>Households experiencing any of 4 housing problems</b>	<b># with problems</b>	<b># households</b>	<b>% with problems</b>
<b>Race/Ethnicity</b>			
White, Non-Hispanic	30,885	127,211	24.28%
Black, Non-Hispanic	5,177	11,923	43.42%
Hispanic	979	2,790	35.09%
Asian or Pacific Islander, Non-Hispanic	482	2,245	21.47%
Native American, Non-Hispanic	156	257	60.70%
Other, Non-Hispanic	630	1,706	36.93%
<b>Total</b>	<b>38,375</b>	<b>146,220</b>	<b>26.24%</b>
<b>Household Type and Size</b>			
Family households, <5 people	17,887	88,386	20.24%
Family households, 5+ people	3,775	14,238	26.51%
Non-family households	16,675	43,556	38.28%
<b>Households experiencing any of 4 Severe Housing Problems</b>	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>
<b>Race/Ethnicity</b>			
White, Non-Hispanic	13,761	127,211	10.82%
Black, Non-Hispanic	2,902	11,923	24.34%
Hispanic	414	2,790	14.84%
Asian or Pacific Islander, Non-Hispanic	343	2,245	15.28%
Native American, Non-Hispanic	40	257	15.56%
Other, Non-Hispanic	257	1,706	15.06%
<b>Total</b>	<b>17,730</b>	<b>146,220</b>	<b>12.13%</b>

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

Source: AFFH Data and Mapping Tool, Data Accessed September 2023 (values and totals originated from AFFH Data and Mapping Tool).

### Cost Burden in Urban County

**Table 33** shows the severe housing cost burden for Macomb County Urban County. For purposes of this analysis, disproportionate cost burden is that which is 10 percentage points higher than for the geography (i.e., county or region) as a whole. As shown, 21.67% of Black households experience severe housing cost burden. Other, Non-Hispanic households (14.01%) also have a higher percentage of households with severe housing cost burden. These percentages are similar for the greater Detroit-Warren-Dearborn Region.

In both Macomb County Urban County and the region, the occurrence of severe housing cost burden is greatest in non-family households. Large households (5 or more people) have slightly smaller percentages of severe cost burden than small households (less than 5 people).

Based on the data provided in **Table 33**, disproportionate severe housing cost burden may exist for Black households. Non-family are more cost burdened than small households (less than 5 people) and large households (5 or more people).

<b>Table 33: Demographics of Households with Severe Housing Cost Burden</b>			
<b>Households with Severe Housing Cost Burden</b>	<b>(Macomb County, MI CDBG, ESG) Jurisdiction</b>		
<b>Race/Ethnicity</b>	<b># with severe cost burden</b>	<b># households</b>	<b>% with severe cost burden</b>
White, Non-Hispanic	12,250	127,211	9.63%
Black, Non-Hispanic	2,584	11,923	21.67%
Hispanic	315	2,790	11.29%
Asian or Pacific Islander, Non-Hispanic	190	2,245	8.46%
Native American, Non-Hispanic	20	257	7.78%
Other, Non-Hispanic	239	1,706	14.01%
<b>Total</b>	<b>15,598</b>	<b>146,220</b>	<b>10.67%</b>
<b>Household Type and Size</b>	<b># with severe cost burden</b>	<b># households</b>	<b>% with severe cost burden</b>
Family households, <5 people	7,166	88,386	8.11%
Family households, 5+ people	1,044	14,238	7.33%
Non-family households	7,343	43,556	16.86%

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

Source: AFFH Data and Mapping Tool, Data Accessed September 2023 (values and totals originated from AFFH Data and Mapping Tool).

### 3.0 MORTGAGE ACTIVITY

#### Mortgage Based on Income and Race

**Tables 34-38** provide information on mortgage applications and originations based on the metropolitan statistical AMI for the area that encompasses Warren, Troy, and Farmington Hills, Michigan. The data is further broken down into categories based on race or ethnicity. In general, a higher percentage and number of loans were provided to applicants with higher incomes, which is not unexpected. The lowest percentage of loans were originated for those people within the <50% of MSA AMI income category. Black/African American, 2 or More Minority Races, and American Indian/Alaska Native race or ethnicity groups consistently received a low percentage of loans originated when compared to other groups, such as the White race or Non-Hispanic ethnicity groups.



Of all the racial and ethnic groups in Macomb County, **Table 34** demonstrates that the <50% MSA AMI group has the lowest overall percentages of loan origination, when compared to higher income groups. The American Indian/Alaska Native and 2 or More Minority Races had the lowest percentages of loan origination at 39.6% and 32.4%, respectively. The White, Asian, and Joint (White/Minority Race) racial groups had the highest percentage of loans originated at 51.1%, 54.1%, and 52.4%, respectively. Most of the other racial and ethnic groups had loan origination percentages in the 40% range.

<b>Table 34: Income, Race and Ethnicity: &lt; 50% of MSA AMI</b>					
<b>RACE/ETHNICITY</b>	<b>FHA, FSA/RHS, VA, and Conventional</b>				
	<b>Applications Received</b>		<b>Loans Originated</b>		<b>Percent Originated</b>
	<b>Number</b>	<b>\$000's</b>	<b>Number</b>	<b>\$000's</b>	
American Indian/Alaska Native	134	\$12,570	53	\$5,085	39.6%
Asian	955	\$149,205	517	\$82,345	54.1%
Black or African American	2,430	\$269,630	1,003	\$117,895	41.3%
Native Hawaiian/Other Pacific Islander	34	\$4,680	14	\$1,400	41.2%
White	16,961	\$200,1065	8,674	\$1,035,480	51.1%
2 or More Minority Races	68	\$7,130	22	\$2,330	32.4%
Joint (White/Minority Race)	105	\$12,865	55	\$7,345	52.4%
Race not Available	4,321	\$530,255	1,791	\$228,145	41.4%
Hispanic or Latino	753	\$81,035	302	\$34,750	40.1%
Not Hispanic or Latino	19,944	\$2,368,120	9,932	\$1,203,110	49.8%
Joint (Hispanic or Latino/Not Hispanic or Latino)	136	\$16,020	56	\$7,170	41.2%
Ethnicity Not Available	4,161	\$521,365	1,836	\$234,740	44.1%

Source: HMDA Aggregate Table 5 (2022)

**Table 35** depicts that for the income group in Macomb County ranging from 50-79% MSA AMI, the Asian racial group had the highest percentage of loans originated (66.8%), while the Native Hawaiian/Pacific Islander and 2 or More Minority Races both had origination rates less than 50%. Again, the White racial group maintains a high percentage of loans originated, as does Joint (White/Minority Race) applicants.

<b>Table 35: Income, Race and Ethnicity: 50 - 79% of MSA AMI</b>					
<b>RACE/ETHNICITY</b>	<b>FHA, FSA/RHS, VA, and Conventional</b>				
	<b>Applications Received</b>		<b>Loans Originated</b>		<b>Percent Originated</b>
	<b>Number</b>	<b>\$000's</b>	<b>Number</b>	<b>\$000's</b>	
American Indian/Alaska Native	137	\$21,095	69	\$11,745	50.4%
Asian	1049	\$214,065	701	\$147,325	66.8%
Black or African American	3019	\$467,245	1604	\$256,130	53.1%
Native Hawaiian/Other Pacific Islander	41	\$6,875	20	\$3,320	48.8%
White	22526	\$3,618,380	14625	\$2,422,465	64.9%
2 or More Minority Races	51	\$7,825	19	\$3,235	37.3%
Joint (White/Minority Race)	237	\$36,335	144	\$24,180	60.8%
Race not Available	5429	\$880,905	3025	\$505,185	55.7%
Hispanic or Latino	761	\$117,815	470	\$79,770	61.8%
Not Hispanic or Latino	26096	\$4,209,730	16552	\$2,760,190	63.4%
Joint (Hispanic or Latino/Not Hispanic or Latino)	280	\$41,000	162	\$25,210	57.9%
Ethnicity Not Available	5343	\$882,825	3019	\$507,695	56.5%

Source: HMDA Aggregate Table 5 (2022)

**Table 36** demonstrates that in Macomb County, 71.1% of loans were originated for Joint (White/Minority Race) racial groups with an income of 80-99% of MSA AMI. Comparatively, 70.0% of loans were originated for White racial groups. Only 34.5% and 53.0% of loans were originated for individuals in the American Indian/Alaska Native and Black/African American racial groups, respectively.

<b>Table 36: Income, Race and Ethnicity: 80 - 99% of MSA AMI</b>					
<b>RACE/ETHNICITY</b>	<b>FHA, FSA/RHS, VA, and Conventional</b>				
	<b>Applications Received</b>		<b>Loans Originated</b>		<b>Percent Originated</b>
	<b>Number</b>	<b>\$000's</b>	<b>Number</b>	<b>\$000's</b>	
American Indian/Alaska Native	29	\$3,905	10	\$1,430	34.5%
Asian	431	\$102,525	273	\$66,245	63.3%
Black or African American	698	\$127,700	370	\$68,800	53.0%
Native Hawaiian/Other Pacific Islander	10	\$1,900	7	\$1,405	70.0%
White	6058	\$1,136,830	4125	\$785,565	68.1%
2 or More Minority Races	13	\$2,555	8	\$1,480	61.5%
Joint (White/Minority Race)	76	\$12,670	54	\$8,690	71.1%
Race not Available	1465	\$284,485	856	\$172,480	58.4%
Hispanic or Latino	203	\$42,495	121	\$26,005	59.6%
Not Hispanic or Latino	7024	\$1,330,220	4638	\$892,580	66.0%
Joint (Hispanic or Latino/Not Hispanic or Latino)	101	\$17,685	68	\$12,030	67.3%
Ethnicity Not Available	1450	\$281,800	874	\$175,110	60.3%

Source: HMDA Aggregate Table 5 (2022)

As shown by **Table 37**, the White, Joint (White/Minority Race), and Non-Hispanic racial or ethnic group within the 100-119% MSA AMI has the highest percentage of loans originated (higher than 65%). The Native Hawaiian/Pacific Islander racial group had the lowest percentage of loan origination at only 18.2%. That is a staggering 27.6 percentage points away from the next lowest percentage of origination at 45.8% for 2 or More Minority Races. It is also nearly 50 percentage points away from the highest percent of loan origination for the White racial group (67.9%). Hispanic ethnic groups experienced an average of 64.5% loan origination.

<b>Table 37: Income, Race and Ethnicity: 100 - 119% of MSA AMI</b>					
<b>RACE/ETHNICITY</b>	<b>FHA, FSA/RHS, VA, and Conventional</b>				
	<b>Applications Received</b>		<b>Loans Originated</b>		<b>Percent Originated</b>
	<b>Number</b>	<b>\$000's</b>	<b>Number</b>	<b>\$000's</b>	
American Indian/Alaska Native	67	\$13,255	38	\$8,830	56.7%
Asian	1434	\$411,660	928	\$269,140	64.7%
Black or African American	1409	\$281,185	814	\$16,6290	57.8%
Native Hawaiian/Other Pacific Islander	11	\$2,525	2	\$380	18.2%
White	14155	\$2,898,155	9618	\$1,996,640	67.9%
2 or More Minority Races	24	\$4,190	11	\$2,195	45.8%
Joint (White/Minority Race)	225	\$46,875	151	\$33,865	67.1%
Race not Available	3511	\$758,735	2169	\$474,685	61.8%
Hispanic or Latino	533	\$118,365	344	\$81,230	64.5%
Not Hispanic or Latino	16583	\$3,496,035	11091	\$2,367,375	66.9%
Joint (Hispanic or Latino/Not Hispanic or Latino)	235	\$46,875	149	\$32,115	63.4%
Ethnicity Not Available	3482	\$754,520	2146	\$471,090	61.6%

Source: HMDA Aggregate Table 5 (2022)

**Table 38** shows that the highest percentages of loans in the > 120% of MSA AMI income group were provided to the racial or ethnic groups of White, Joint (White/Minority Race), and Non-Hispanic (all 70.0% or higher). Notably, the lowest percentage of loans originated is 30.0% (Black/African American), which is a significantly lower percentage than the rest of the racial and ethnic groups within this income bracket.

<b>Table 38: Income, Race and Ethnicity: &gt; 120% of MSA AMI</b>					
<b>RACE/ETHNICITY</b>	<b>FHA, FSA/RHS, VA, and Conventional</b>				
	<b>Applications Received</b>		<b>Loans Originated</b>		<b>Percent Originated</b>
	<b>Number</b>	<b>\$000's</b>	<b>Number</b>	<b>\$000's</b>	
American Indian/Alaska Native	82	\$19,670	42	\$10,720	51.2%
Asian	2538	\$910,980	1629	\$606,575	64.2%
Black or African American	1642	\$465,040	985	\$284,425	60.0%
Native Hawaiian/Other Pacific Islander	20	\$4,260	6	\$1,320	30.0%
White	24137	\$7,250,015	17143	\$5,238,545	71.0%
2 or More Minority Races	44	\$11,150	19	\$4,995	43.2%
Joint (White/Minority Race)	623	\$209,865	460	\$162,440	73.8%
Race not Available	5875	\$1,734,015	3728	\$1,120,870	63.5%
Hispanic or Latino	691	\$201,505	435	\$137,805	63.0%
Not Hispanic or Latino	27844	\$8,514,610	19477	\$6,053,625	70.0%
Joint (Hispanic or Latino/Not Hispanic or Latino)	507	\$151,025	333	\$106,915	65.7%
Ethnicity Not Available	5912	\$1,736,510	3766	\$1,131,650	63.7%

Source: HMDA Aggregate Table 5 (2022)

### 3.1 INTEGRATION AND ISOLATION

In order to affirmatively further fair housing, Macomb County must recognize barriers to fair housing choice and provide actions to increase choice. An analysis of isolation and integration across the county helps to identify areas where these barriers may exist. Residential isolation produces damaging socioeconomic outcomes for minority and low-income groups. Housing patterns across the United States, and Macomb County, continue to show lasting areas of separation for certain races and income groups. The social and public policies of our past, like Jim Crow laws and Federal Housing Administration's early redlining policies, brought about much of the segregation in housing that is still seen today. More recent trends in residential isolation are generally attributed to suburbanization, discrimination, and personal preferences.

An analysis of historical U.S. Census data by researchers at Harvard and Duke Universities for the Manhattan Institute for Policy Research, indicates that racial separation has diminished since the 1960s. In 2012, the Manhattan Institute published "The End of the Segregated Century: Racial Separation in American's Neighborhoods, 1890- 2010" which indicated that 522 out of 658 housing markets recorded a decline in segregation. The report, indicates that the separation of Black/African American residents from other races is now lower than the national average from 1970. In addition, separation continued to drop over the last decade.

Despite recent trends in integration, Black/African American households remain the most isolated racial group and are in fact hyper-separated in many of the largest metropolitan areas, including Baltimore, Chicago, Cleveland, Detroit, Houston, Los Angeles, New Orleans, New York, Philadelphia and Washington, D.C. according to "A Right to Housing: Foundation for a New Social Agenda" published by Temple University (February 2006). Hispanics are the second most isolated racial group, primarily in northern metropolitan areas.

Patterns for income segregation are derived from the National Survey of America's Families, the Census and Home Mortgage Disclosure Act data, which indicate income segregation grew between 1970 and 1990. Poor families are becoming more isolated. Whereas in 1970 only 14 percent of poor families lived in predominantly poor areas, this number increased to 28 percent in 1990 and continues to rise according to the Urban Institute who published "Residential Segregation and Low-Income Working Families" (March 2009). Current trends in racial and income based residential isolation are attributed to several factors, including:

A. Exclusionary zoning and land use practices

The "separate but equal" laws established in the early part of the 20th Century specified exclusively Black/African American, White/Caucasian and mixed districts and legally established segregation in housing opportunities. Many cities, particularly in the South and mid-South, developed and adopted racial zonings between 1910 and 1915. By 1917, the Supreme Court ruled that racial zoning was illegal, but many local governments continued to enforce racial

segregation through alternative land use designations. While these actions occurred a century ago, the impact is still felt because of their significant influence on settlement patterns.

Today, many jurisdictions adopt land-use zoning regulations such as large-lot zoning, minimum house size requirements, and bans on secondary units which make housing more expensive. The result is often the exclusion of lower income households from certain communities and/or neighborhoods.

B. Discriminatory homeownership practices

Discriminatory homeownership practices include redlining and steering. In 1944, the Federal Housing Administration adopted maps developed by the federally created Home Owners' Loan Corporation that coded areas as "credit-worthy" based on race and the age of the housing stock. These maps, called Residential Security Maps, established and sanctioned "redlining." It became common practice for banks to deny residents in predominately minority neighborhoods long-term mortgages because they lived in redlined areas.

The United States Supreme Court defines steering as a "practice by which real estate brokers and agents preserve and encourage patterns of racial segregation by either steering members of racial and ethnic groups to certain neighborhoods occupied by similar groups and away from neighborhoods inhabited primarily by members of other races or groups." Essentially, real estate agents "steer" people of color toward neighborhoods of color, while White/Caucasian homebuyers are directed to primarily White/Caucasian neighborhoods, continually reinforcing separation and isolation. The Fair Housing Act made discrimination in housing illegal. However, there is a belief that steering is still common. For example, some real estate agents may indirectly and possibly unknowingly steer families through using language such as "ethnic mix" or "multicultural."

C. Attitudes and preferences towards housing location

Residential preferences of persons of color may, in some instances, be categorized by social-psychological and socioeconomic demographic characteristics. The theory behind social-psychological residential preference is that separation is a result of persons of color choosing to live together because of cultural similarities, maintaining a sense of racial pride, or a desire to avoid living near other groups because of fear of racial hostility. Other theories suggest demographic and socioeconomic factors such as age, gender and social class influence residential choice more than race. Evidence explaining these assumptions are generally limited and anecdotal in nature [Farley, Reynolds; Fielding, Elaine L.; Krysan, Maria (1997). "The residential preferences of blacks and whites: A four-metropolis analysis". *Housing Policy Debate* 8 (4): 763–800].

Data suggests that foreign-born Hispanics, Asians and Black/African Americans often have higher rates of isolation than do native-born individuals from these same groups. Separation of immigrants is generally associated with language barriers. Support networks often exist in these

enclaves to assist with linguistic isolation. Research on assimilation shows that while new immigrants settle in homogenous ethnic communities, isolation declines as they gain socioeconomic status and move away from these communities, integrating with the native-born. This provides some support to the idea that socioeconomic status plays a significant role in housing choice, possibly more than race.

#### D. Location of Public Housing

Racial separation in public housing occurs when high concentrations of a certain minority group occupy one specific public housing development. Income segregation occurs when high concentrations of public housing are located in one specific area of a community or region. Of the 310 public housing units constructed by the Public Works Administration and the U.S. Housing Authority before World War II, 279 were segregated by race. After World War II, antidiscrimination laws were passed which made segregated public housing illegal. However, the historical pattern was set.

In addition, most of the housing projects built between 1932 and 1963 were located primarily in “slum” areas and vacant industrial sites according to the Urban Institute (UI), which published “Residential Segregation and Low-Income Working Families” (March 2009). This trend continued between 1964 and 1992, when most projects were located in the older parts of core cities that were considered low income. Due to these practices, public housing is concentrated, increasing the density of low-income families in certain parts of communities.

#### E. Gentrification

Gentrification is another form of residential separation, generally by class or economic status, and is defined by new higher income residents displacing lower income residents in emerging urban neighborhoods. The most commonly held belief about gentrification is that residential turnover of an area is from one that is predominantly residents of color, to one that is populated by higher income White/Caucasians. However, definitions of gentrification do not typically mention this racial component.

#### F. Federal Highway Policies

The Federal Highway Act of 1956 authorized the construction of interstate and highway systems throughout the United States, cutting through many metropolitan areas and cities. The result was the splitting of communities either by segregating one group from another or by running the new road system through the middle of a minority community. The impacts of the highway system are still felt today, especially in areas of New York City (e.g., the Bronx), Detroit (e.g., Mexicantown and Corktown), and more. The physical separation of people from places and connectivity has further segregated many groups and populations, while contributing to the systemically racist policies that remain pervasive in this country.



## Integration and Isolation in Macomb County

Areas of racial integration and isolation can be found in the Macomb County (reference **Population Density by Race/Ethnicity** map – Appendix A). The greatest percentage of the County’s population is white, and, among the Urban County municipalities, there is evidence of integration in the cities of Centerline, Eastpointe, and Mount Clemens. However, while there are populations of White, Black, Hispanic, and Other Racial Groups mixed together, there is still a strong trend of Black populations residing primarily along the southern edge of the County while White, Hispanic, and Other racial group populations tend to reside further north. In addition, several of these communities including Sterling Heights, Clinton Township, Warren, Roseville, and St Clair Shores all receive their own CDBG allocations. Along the I-94 corridor, there is a clear divide between minority populations and white populations. Harrison Township, the city of St. Clair Shores, and the Village of Grosse Pointe Shores are predominantly white neighborhoods. Evidently, established municipalities within the County have higher concentrations of people of color and areas of integration while neighborhoods developed later in the County’s history tend to be more isolated and have higher concentrations of White/Caucasian households.

Non-White persons make up 21.4% of the total population of Macomb County. Based on this percentage, an assumption can be made that a Census tract with at least 21.4% of people that identify as non-white would be fairly integrated per County averages. Census tracts with percentages much higher or much lower than 21.4% would be considered more isolated for the demographic group that lives in the Census Tract. For example, Census Tract 2588 has one of the highest percentages of Non-White populations and therefore White/Caucasians are isolated within this neighborhood; this may indicate that minority populations are directed to specific neighborhoods.

HUD defines racial concentration as an area having more than 50% non-White/Caucasian population. Listed in **Table 39** are the census tracts within the Macomb County whose minority population is greater than 50%.

Census Tract	Total Population	Total Minority Population	% of Total
All	879,123	187,763	21.4%
9822	33	33	100.0%
9820.02	23	23	100.0%
2588	3,563	2,604	73.1%
2454	1,309	839	64.1%
2640	2,065	1,401	67.8%
2636	5,632	3,310	58.8%
2585	2,124	1,425	67.1%
2638	2,488	1,576	63.3%

2586	4,629	2,907	62.8%
2587	2,826	1,802	63.8%
2683	2,949	1,747	59.2%
2642	4,799	2,417	50.4%
2637	4,945	3,134	63.4%
2589	3,443	2,229	64.7%
2584	5,567	2,962	53.2%
2583	2,526	1,290	51.1%
2552	3,775	2,032	53.8%

Source: 2017-2021 American Community Survey 5-Year Estimates

Residents who identified themselves during the 2017-2021 ACS as Black/African American are the second largest racial group in Macomb County at 12.1%. Based on the assumption that a percentage share similar to the County as a whole would indicate a more integrated Census Tract in Macomb County. The Census Tracts 2612 (11.9%), 2560 (12.2%), and 2446 (12.0%) are the closest to the 12.1% total population share.

**Table 40** shows all Census Tracts in Macomb County are disproportionately higher than the county average percentage of Black/African American Populations (i.e., 10 percentage points greater than the average county share, or higher than 12.1%). The most important note gathered from **Table 40** is the extremely high concentrations of Black/African Americans in Census Tracts 2585, 2588, 2589, and 9822. As indicated earlier in this report, these neighborhoods are hyper-separated as defined by the book “A Right to Housing: Foundation for a New Social Agenda” (Temple University Press, February 2006). This can be viewed graphically on the African American Population map located in the Appendix of this report. The following table displays a select group of Census Tracts that are closest to and farthest from the total percentage Black or African American population within the County.

**Table 40: Black/African American Population by Census Tract**

Census Tract	Total Population	Total Black/African American Population	% of Total
All	879,123	106,708	12.1%
2180.02	3,285	794	24.2%
2309.02	2,768	833	30.1%
2400	3,762	1,094	29.1%
2410	4,351	1,581	36.3%
2416	2,542	868	34.1%
2418	5,374	1,750	32.6%
2420.03	2,695	957	35.5%
2421	2,243	798	35.6%
2435.02	4,307	997	23.1%

2450	3,412	1,359	39.8%
2452	2,730	729	26.7%
2454	1,309	723	55.2%
2476.01	1,960	636	32.4%
2550	4,620	1,510	32.7%
2552	3,775	1,803	47.8%
2555	1,605	358	22.3%
2557	1,877	536	28.6%
2561	2,788	689	24.7%
2563	1,876	558	29.7%
2566	2,738	876	32.0%
2580	2,508	996	39.7%
2581	4,077	1,602	39.3%
2582	2,885	1,123	38.9%
2583	2,526	1,150	45.5%
2584	5,567	2,361	42.4%
2585	2,124	1,338	63.0%
2586	4,629	2,674	57.8%
2587	2,826	1,526	54.0%
2588	3,563	2,569	72.1%
2589	3,443	2,139	62.1%
2610	4,492	1,265	28.2%
2611	5,317	1,266	23.8%
2615	3,772	1,317	34.9%
2617	2,669	1,033	38.7%
2627	5,323	1,613	30.3%
2628	2,134	535	25.1%
2629	4,322	984	22.8%
2636	5,632	1,885	33.5%
2637	4,945	2,743	55.5%
2638	2,488	1,418	57.0%
2639	3,619	1,132	31.3%
2640	2,065	970	47.0%
2642	4,799	2,100	43.8%
2680	5,625	1,302	23.1%
2681	2,890	1,067	36.9%
2683	2,949	1,603	54.4%
2684	3,194	825	25.8%
9822	33	25	75.8%

**Census Tracts with the highest concentration of Black or African American population**

Source: US Census Bureau 2017-2021 American Community Survey 5-year Estimates

**Table 41** shows all Census Tracts in Macomb County are disproportionately higher than the county average percentage of Hispanic/Latin(x) Populations (i.e., 10 percentage points greater than the county average share, or higher than 2.8%). As evidenced in **Table 41** below, Census Tracts 2471, 2559, and 2600 have the highest concentrations of Hispanic or Latin(x) population within the County, while Census Tracts 2515 (3.0%), 2515 (2.7%), 2500 (2.8%), 2454 (2.7%), 2308 (2.6%), 2145 (2.9%), and 2280 (2.8%) have the closest to the average share of Hispanic/Latin(x) population (2.8%) in the County.

**Table 41: Hispanic/Latin(x) Population by Census Tract**

Census Tract	Total Population	Total Hispanic/Latin(x) Population	% of Total
All	879,123	24,591	2.8%
2221.04	2,870	393	13.7%
2281	1,703	224	13.2%
2471	740	107	14.5%
2559	2,052	320	15.6%
2600	3,429	503	14.7%
2400	3,762	498	13.2%

**Census Tracts with the highest concentration of Hispanic/Latin(x) population**

Source: US Census Bureau 2017-2021 American Community Survey 5-year Estimates

It is important that individuals be able to choose where they prefer to live without regard to race, color, religion, national origin, sex, familial status or disability. An analysis of segregation and integration serves to ensure that communities provide open and fair access to residential neighborhoods. While individuals are free to choose where they prefer to live, the Fair Housing Act prohibits policies and actions by entities and individuals that deny choice or access to housing or opportunity through the segregation of protected classes.

A dissimilarity index is used to measure the degree to which two groups are evenly distributed across a geographic area. It is a tool used to assess residential segregation between two groups. The dissimilarity index provides values ranging from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured. The table below, **Table 42(A)**, demonstrates the general relationship between dissimilarity index values and the level of segregation.

**Table 42(A): Dissimilarity Index**

	Value	Level of Segregation
Dissimilarity Index Value (0-100)	0-39	Low Segregation
	40-54	Moderate Segregation
	55-100	High Segregation

Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019

However, context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, just the relative degree of segregation; and, for populations that are small in absolute number, the dissimilarity index may be high even if the group’s members are evenly distributed throughout the area. The index measures only two groups at a time, and therefore it is less reliable as a measure of segregation in areas with multiple racial or ethnic groups.

According to **Table 42(B)** and the most recent available data (updated September 2017), Macomb County currently experiences low to moderate segregation between different racial groups. The Black/White dissimilarity index is the highest with a value of 54.99 which is on the border of moderate to high. However, it is important to note that the Black/White dissimilarity index shows a decrease since 1990 when the value was at 71.01.

**Table 42(B)** shows the dissimilarity index value for Hispanic/White and Asian or Pacific Islander/White have increased between 1990 and today.

<b>Table 42(B): Racial/Ethnic Dissimilarity Trends</b>				
<b>(Macomb County, MI CDBG, ESG) Jurisdiction</b>				
<b>Racial/Ethnic Dissimilarity Index</b>	<b>1990 Trend</b>	<b>2000 Trend</b>	<b>2010 Trend</b>	<b>Current</b>
Non-White/White	40.93	33.36	32.33	38.82
Black/White	71.01	56.37	50.04	54.99
Hispanic/White	17.53	23.58	25.31	29.53
Asian or Pacific Islander/White	26.52	25.81	28.57	36.93

*Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019*

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

A racially or ethnically concentrated area of poverty (R/ECAP) is a geographic area with significant concentrations of poverty and minority concentrations. A large body of research has consistently found that the problems associated with segregation are intensified when combined with concentrated poverty. Neighborhoods of concentrated poverty may isolate residents from the resources and networks needed. Concentrated poverty has also been found to have a long-term effect on outcomes for children growing up in these neighborhoods related to a variety of indicators, including crime, health and education, future employment, and lifetime earnings. A R/ECAP analysis addresses concerns raised in the legislative history of the Fair Housing Act. The 1968 Kerner Commission on Civil Disorders acknowledged that “segregation” and poverty” create “a destructive environment”.

Data collected from the AFFH Data identifies two Census Tracts that HUD defines as a R/ECAP within Macomb County. Census Tract 2640 and Census Tract 2637 are shown on the attached maps as a R/ECAP area as defined by HUD and resides within the City of Warren. This is outside the Macomb County CDBG and ESG jurisdiction. According to the 2017-2021 ACS, Census Tract 2640 has a poverty

rate of 21.2% among the entire population and Census Tract 2637 has a poverty rate of 19.2% among the entire population.

## 4.0 MACOMB COUNTY FAIR HOUSING PROGRAM ACTIONS (2019-2022)

The County does not have enough funding to address all impediments every program year. The actions taken during this reporting period were subject to the availability of HUD funding and the availability of local resources (staff and funding). Previous actions were also limited due to restrictions in staffing, funding, and opportunity during the COVID-19 pandemic that dominated household and workplace dynamics for over two years. As such, actions to address fair housing were limited. However, the County understands the importance of supporting Fair Housing and will continue to make best efforts to address the recommendations provided in the AI.

### 4.1 PROGRAM YEAR 2018

During this reporting period the following actions were taken to address the following impediments:

#### **Lack of Fair Housing Education and Awareness**

- Macomb County provided funding to the Fair Housing Center of Metropolitan Detroit for the purpose of investigating fair housing complaints and training.
- Training sessions included “Fair Housing & Support Animals” held on May 9, 2019 by the Fair Housing Center of Metropolitan Detroit and “Tenant Rights Learning Session” held on April 16, 2019 by Lakeshore Legal Aid.
- Continental Management, management company for the County HOME funded Oakwood Senior Housing facility, required all employees to complete Fair Housing training within 90 days of hire.

#### **Racial and Ethnic Minorities are Concentrated Geographically within the County**

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (One Macomb). One Macomb was sparked by a comprehensive study titled, "The New Macomb County" prepared in partnership with Macomb Community College, Macomb County, and Data Drive Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make up of citizens that make Macomb their home.

The purpose, vision, and mission of One Macomb is as follows:

- **Purpose** - to support Macomb County leaders in active, positive, and affirmative response to its increasing cultural diversity and inclusion efforts.
- **Vision** - a community that welcomes all people and celebrates their unique contributions.
- **Mission** - to facilitate or support collaborative and community-based activities which celebrate cultural diversity and inclusion in Macomb County.

HUD’s review letter for Macomb County’s 2017 CAPER stated that the County must complete a new

AI. The County started this process during the 2018 program year. The final document was completed in 2019.

## 4.2 PROGRAM YEAR 2019

During this reporting period the following actions were taken to address the following impediments:

### **Lack of Fair Housing Education and Awareness**

- Macomb County implemented a new process with its CDBG participating communities. Each community was required to complete a “Fair Housing Impact Statement for the Analysis of Impediments”. This form lists the impediments that were identified in the 2019 AI and the corresponding action items to address each impediment. Each community was required to commit to address at least two action items during the 2019 program year and provide a narrative of how that would be achieved. Program staff followed up with each community to ensure compliance. Technical assistance was provided as needed.
- June 1, 2020 – Macomb County program staff sent the NFHA Fair Housing PSA Catalog to all community partners to help them meet their fair housing goals.
- Macomb County typically conducts in-person fair housing training each year in the spring. Due to COVID-19 no in person trainings were held. Efforts were made to coordinate virtual training for the 2020 program year.
- January 2020 – Macomb County program staff distributed six different fair housing brochures to all community partners for display in their office.
- Continental Management, the management company for the County HOME funded Oakwood Senior Housing facility, required all employees to complete Fair Housing training within 90 days of hire.

### **Racial and Ethnic Minorities are Concentrated Geographically within the County**

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (One Macomb). One Macomb was sparked by a comprehensive study titled, "The New Macomb County" prepared in partnership with Macomb Community College, Macomb County, and Data Driven Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make up of citizens that make Macomb their home.

## 4.3 PROGRAM YEAR 2020

During this reporting period the following actions were taken to address the following impediments:

### **Lack of Fair Housing Education and Awareness**

- Macomb County implemented a new process with its CDBG participating communities. Each community was required to complete a “Fair Housing Impact Statement for the Analysis of Impediments”. This form lists the impediments that were identified in the 2019 AI and the

corresponding action items to address each impediment. Each community was required to commit to address at least two action items during the 2020 program year and provide a narrative of how that would be achieved. Program staff followed up with each community to ensure compliance. Technical assistance was provided as needed.

- Macomb County typically conducts in-person fair housing training each year in the spring. Due to COVID-19 no in person trainings were held. A virtual training, “Fair Housing Virtual Learning Session – Fair Housing Act”, was held on November 12, 2020. A copy of the flyer from the training is provided as an attachment to screen CR-00.
- April 15, 2021 – Macomb County program staff provided Urban County participating communities with Fair Housing PSAs for Fair Housing Month.
- Continental Management, the management company for the County HOME funded Oakwood Senior Housing facility, required all employees to complete Fair Housing training within 90 days of hire.

### **Racial and Ethnic Minorities are Concentrated Geographically within the County**

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (One Macomb). One Macomb was sparked by a comprehensive study titled, "The New Macomb County" prepared in partnership with Macomb Community College, Macomb County, and Data Driven Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make up of citizens that make Macomb their home.

## **4.4 PROGRAM YEAR 2021**

During this reporting period the following actions were taken to address the following impediments:

### **Lack of Fair Housing Education and Awareness**

- Macomb County implemented a new process with its CDBG participating communities. Each community was required to complete a “Fair Housing Impact Statement for the Analysis of Impediments”. This form lists the impediments that were identified in the 2019 AI and the corresponding action items to address each impediment. Each community was required to commit to address at least two action items during the 2021 program year and provide a narrative of how that would be achieved. Program staff followed up with each community to ensure compliance. Technical assistance was provided as needed.
- Macomb County typically conducts in-person fair housing training each year in the spring. Due to COVID-19 no in person trainings were held. A virtual training, “Fair Housing Virtual Learning Session – Fair Housing Act”, was held on November 23, 2021. A copy of the agenda from the training is provided as an attachment to screen CR-00.
- Continental Management, the management company for the County HOME funded Oakwood Senior Housing facility, required all employees to complete Fair Housing training within 90 days of hire.



### **Racial and Ethnic Minorities are Concentrated Geographically within the County**

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (One Macomb). One Macomb was sparked by a comprehensive study titled, "The New Macomb County" prepared in partnership with Macomb Community College, Macomb County, and Data Driven Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make up of citizens that make Macomb their home.

## **4.5 PROGRAM YEAR 2022**

During this reporting period the following actions were taken to address the following impediments:

### **Lack of Fair Housing Education and Awareness**

- Macomb County implemented a new process with its CDBG participating communities. Each community was required to complete a "Fair Housing Impact Statement for the Analysis of Impediments". This form lists the impediments that were identified in the 2019 AI and the corresponding action items to address each impediment. Each community was required to commit to address at least two action items during the 2022 program year and provide a narrative of how that would be achieved. Program staff followed up with each community to ensure compliance. Technical assistance was provided as needed.
- Macomb County sponsored a virtual training on June 28, 2023 (presented by the Fair Housing Center of Metropolitan Detroit). There were thirty-two attendees. The following topics were discussed along with a Q & A session on various Fair Housing related issues:
  - Implementation of the Equal Access to Housing in HUD programs regardless of sexual orientation or gender identity (Equal Access Final Rule)
  - Implementation of Equal Access in accordance with an individual's gender identity in HUD Community Planning and Development programs (Gender Identity Final Rule)
- Continental Management, the management company for the County HOME funded Oakwood Senior Housing facility, required all employees to complete Fair Housing training within 90 days of hire.

### **Racial and Ethnic Minorities are Concentrated Geographically within the County**

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (One Macomb). One Macomb was sparked by a comprehensive study titled, "The New Macomb County" prepared in partnership with Macomb Community College, Macomb County, and Data Driven Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make up of citizens that make Macomb their home.

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## 5.0 OVERVIEW OF COMMUNITY INPUT

On August 9, 2023 the County conducted a public meeting for the general public which was located in the Macomb County Senior Center Auditorium.

### 5.1 OPEN DISCUSSION – FAIR HOUSING NEEDS AND CONCERNS

In an effort to provide an environment that would allow for all attendees to participate, an open discussion where citizens were asked to discuss issues and concerns publicly was conducted along with printed surveys and an online survey option. During the open discussion citizens were asked to speak their mind on fair housing issues and concerns affecting their respective community. Through this process many Macomb County residents and service providers spoke out. A number of issues were brought to the Project Team’s attention. Listed below are issues that were discussed during the open discussion:

- Encourage communities to provide fair housing information as part of rental registration process.
- Better fair housing educations and access for renters
- Have more readily available details on complaint process and where to turn when an individual experiences housing discrimination.
- Education for Landlords
- Accessibility in older buildings/units
- Affordable Housing
  - Cost of new homes too high (property costs, home values, interest rates etc.)
  - Lack of supply
- Encourage communities to review regulatory impediments to fair housing such as zoning and restrictions on building smaller homes.

### 5.2 SURVEY – FAIR HOUSING NEEDS AND CONCERNS

The survey was intended to collect information regarding housing needs in Macomb County, to identify any Fair Housing issues and concerns, to educate respondents regarding Fair Housing activities, and to gauge familiarity with Macomb County’s programs and resources regarding Fair Housing. The survey was made available in hard copy form and online. The Fair Housing Survey included 25 questions in a multiple-choice and open-ended question format. The online survey was publicly posted and made available on the County’s website on July 24, 2023 and kept open until August 29, 2023. Additionally, the survey was emailed directly to communities within the study area and many non-profit service providers and stakeholders. Paper copies of the survey were distributed to attendees of the first public meeting held on August 9, 2023. Meeting attendees were also encouraged to invite friends and neighbors to take the online survey, and additional paper copies of the survey were made available upon request. Links to the survey were also printed on all handouts distributed at the public meeting. The survey was closed, and results were tallied during the week of August 29, 2023. In total, 90 surveys (electronic and paper) were returned at the end of survey period.

Listed below are the issues that were discussed and gathered from survey input:

- 41% of respondents know someone who has experienced housing discrimination or have experienced housing discrimination themselves.
- Most commonly discriminated against by a rental property manager/owner
- 67% of respondents indicated that lack of affordable housing options is the primary impediment to fair housing choice in Macomb County.
- 87% of respondents do not believe that there is an adequate supply of affordable housing available to all residents.
- 49% of respondents indicated that they feel their housing choices are limited to a certain area or neighborhood.
- People of color directed to renting or buying homes in certain neighborhoods
- Over 28% of respondents indicated that they would not know what to do, or would not do anything, if they believe they experienced housing discrimination.
- Lack of knowledge about fair housing among general public.
- Nearly 62% of respondents indicated that fair housing literature/information should be easily available at public libraries and County offices.
- Over 66% of respondents indicated that fair housing information should be on the County website.
- Nearly 52% and 45% of respondents indicated that fair housing information should be advertised on the television and radio, respectively.

## 6.0 FAIR HOUSING COMPLAINTS, CHALLENGES, AND IMPEDIMENTS

### Fair Housing Complaint Activity

Citizens of Macomb County who believe they have experienced fair housing discrimination may file their complaints through entities, including but not limited to: the State of Michigan Department of Civil Rights (MDCR); the Fair Housing Center of Metropolitan Detroit (FHCMD); and the HUD Detroit Office of Fair Housing and Equal Opportunity (FHEO).

As part of the AI, the FHCMD was contacted and requested to provide summary information about cases that had been filed by or against organizations or residents in Macomb County. Presented in **Tables 43-47** is the provided fair housing complaint data dating back to 2019.

**Table 43: Fair Housing Complaint Activity (2019)**

Date Received	Type of Inquiry	Property Type	Follow Up
08/08/2019	Landlord Tenant	5 and Above Multi-Family Housing	Landlord-Tenant - Referred to Legal Aid
09/04/2019	Landlord Tenant	5 and Above Multi-Family Housing	Advised/Informed of Landlord- Tenant Law
09/06/2019	Landlord Tenant	1 Single- Family Housing	Advised/Informed of Landlord- Tenant Law
07/09/2019	Physical Disability	1 Single- Family Housing	Advised/Informed of Fair Housing Rights
07/12/2019	Physical Disability	5 and Above Multi-Family Housing	Advised/Informed of Fair Housing Rights
07/12/2019	Race, Physical Disability	5 and Above Multi-Family Housing	Information Gathering and Research
08/12/2019	Race	Condominium - Association or Board	Filed with FHAP (MDCR) (pending)
09/20/2019	Race	Mobile Home	Information Gathering and Research
12/20/2019	Physical Disability	5 and Above Multi-Family Housing	Information Gathering and Research

Source: Fair Housing Center of Metro Detroit (2019-2023)

In 2019, there were nine reported cases of housing discrimination in Macomb County. Of these cases, four were based on disability or handicap. Three of the cases included discrimination against race. cases received a follow-up where appropriate.

**Table 44: Fair Housing Complaint Activity (2020)**

Date Received	Type of Inquiry	Property Type	Follow Up
01/21/2020	Home Purchase, Mortgage or Refinance Related Inquiry	1 Single- Family Housing	Advised/Informed of Fair Housing Rights

**Table 44: Fair Housing Complaint Activity (2020)**

Date Received	Type of Inquiry	Property Type	Follow Up
01/31/2020	Source of Income, Landlord Tenant	5 and Above Multi-Family Housing	Advised/Informed of Fair Housing Rights
02/11/2020	Physical Disability	5 and Above Multi-Family Housing	Information Gathering and Research
02/17/2020	Race, Sex	5 and Above Multi-Family Housing	Information Gathering and Research
02/20/2020	Landlord Tenant	5 and Above Multi-Family Housing	Advised/Informed of Fair Housing Rights
02/25/2020	Race	5 and Above Multi-Family Housing	Awaiting Testing
03/12/2020	Physical Disability	Mobile Home	Information Gathering and Research
03/30/2020	Familial Status	5 and Above Multi-Family Housing	Housing Unit Maintained
05/04/2020	Landlord Tenant, Landlord Tenant - Utility Bills and Charges	1 Single- Family Housing	Advised/Informed of Landlord- Tenant Law
07/02/2020	Physical Disability	Condominium	Reasonable Accommodation Granted
08/10/2020	Mental Disability	1 Single-Family Housing	Pending - Awaiting Enforcement Meeting
09/01/2020	Landlord Tenant	5 and Above Multi-Family Housing	Landlord-Tenant - Referred to Legal Aid
09/09/2020	Mental Disability	5 and Above Multi-Family Housing	Advised/Informed of Fair Housing Rights
09/10/2020	Landlord Tenant	Cooperative	Advised/Informed of Landlord-Tenant Law
09/10/2020	Landlord Tenant	1 Single-Family Housing	Advised/Informed of Landlord-Tenant Law
09/30/2020	Mental Disability	Mobile Home	Filed in State Court (Pending)
10/06/2020	Mental Disability	Mobile Home	Filed in State Court (Pending)
10/14/2020	Landlord Tenant	1 Single-Family Housing	Advised/Informed of Landlord-Tenant Law
10/19/2020	Landlord Tenant	5 and Above Multi-Family Housing	Advised/Informed of Landlord-Tenant Law
11/13/2020	Physical Disability	5 and Above Multi-Family Housing	Reasonable Accommodation Granted
11/20/2020	Familial Status	5 and Above Multi-Family Housing	Housing Unit Maintained
11/30/2020	Race	1 Single-Family Housing	Complaint Withdrawn by Complainant

Source: Fair Housing Center of Metro Detroit (2019-2023)

During the year of 2020, there were a total of 22 reported fair housing complaints received by the FHCMD. There were eight complaints filed based on disability or handicap, and three complaints filed based on race or color. One complaint was also filed regarding discrimination based on sex, and source

of income. Two were based on familial status.

**Table 45: Fair Housing Complaint Activity (2021)**

Date Received	Type of Inquiry	Property Type	Follow Up
01/08/2021	Race	1 Single-Family Housing	Closed - No Outcome
02/12/2021	Landlord Tenant	1 Single-Family Housing	Landlord-Tenant - Referred to Legal Aid
04/09/2021	Physical Disability	1 Single-Family Housing	Pending - Awaiting Enforcement Meeting
04/29/2021	Race	Manufactured Home	Pending - Awaiting Enforcement Meeting
05/03/2021	Familial Status	No Data	Closed - Assisted with HUD/MDCR Filing
05/12/2021	Mental Disability	5 and Above Multi-Family Housing	Pending - Awaiting Information from Complainant
05/20/2021	Race	Cooperative	Pending - Awaiting Information from Complainant
05/25/2021	Race	5 and Above Multi-Family Housing	Pending - Investigation Following Enforcement Meeting
04/21/2021	Landlord Tenant	5 and Above Multi-Family Housing	Closed - Other
04/22/2021	Landlord Tenant	1 Single-Family Housing	Closed – Landlord-Tenant Outcome(s)
06/10/2021	Race	1 Single-Family Housing	Pending – Awaiting Testing
05/17/2021	Landlord Tenant	Manufactured Home	Landlord-Tenant - Referred to City or Township Building Department
04/30/2021	Home Purchase, Mortgage, or Refinance Related Inquiry	No Data	No Data
06/02/2021	Landlord Tenant	5 and Above Multi-Family Housing	Advised/Informed of Landlord-Tenant Law
06/14/2021	Landlord Tenant	Place of Public Accommodation	Landlord-Tenant - Counseled and Closed (Non-Fair Housing Issue)
07/06/2021	Physical Disability	5 and Above Multi-Family Housing	Advised/Informed of Fair Housing Rights
07/22/2021	Mental Disability	5 and Above Multi-Family Housing	Complaint Withdrawn by Complainant
08/05/2021	Race	Condominium	Closed - Fair Housing and Landlord-Tenant Outcomes
07/01/2021	Landlord Tenant	2-4 Multi- Family Housing	Landlord-Tenant - Provided Michigan Landlord-Tenant Guide
07/02/2021	Landlord Tenant	5 and Above Multi-Family Housing	Landlord-Tenant - Referred to Legal Aid
10/05/2021	Physical Disability	1 Single- Family Housing	FHIP Administratively Closed - No Contact After 10-Day Letter Sent

**Table 45: Fair Housing Complaint Activity (2021)**

Date Received	Type of Inquiry	Property Type	Follow Up
10/07/2021	Race	1 Single- Family Housing	Pending - Awaiting Testing
07/21/2021	Home Purchase, Mortgage or Refinance Related Inquiry	1 Single- Family Housing	Filed in State Court (Pending)
10/14/2021	Race	1 Single- Family Housing	Pending - Awaiting Testing
08/16/2021	Landlord Tenant	1 Single- Family Housing	Landlord-Tenant - Referred to Legal Aid
09/01/2021	Landlord Tenant	Municipality	Landlord-Tenant - Referred to Housing Commission/HCV Administrator
11/11/2021	Race	1 Single- Family Housing	Pending - Awaiting Testing
10/04/2021	Landlord Tenant	1 Single- Family Housing	Landlord-Tenant - Referred to Legal Aid

Source: Fair Housing Center of Metro Detroit (2019-2023)

In 2021, there were 28 reported complaints against fair housing in Macomb County. There were five complaints filed because of disability or handicap. There were nine complaints based on race, and one based on Familial Status. Several cases reported landlord/tenant disputes. Each case received a follow-up where appropriate.

**Table 46: Fair Housing Complaint Activity (2022)**

Date Received	Type of Inquiry	Property Type	Follow Up
01/28/2022	Physical Disability	5 and Above Multi-Family Housing	Pending - Awaiting Response by Respondent
02/08/2022	Criminal Background (Race - Black)	5 and Above Multi-Family Housing	Pending - Awaiting Testing
02/08/2022	Criminal Background (Race - Black)	Condominium	Pending - Awaiting Testing
03/07/2022	Physical Disability	5 and Above Multi-Family Housing	FHIP Administratively Closed - No Contact After 10-Day Letter Sent
03/03/2022	Habitability Related Inquiry	1 Single- Family Housing	Pending - Awaiting Information from Complainant
04/07/2022	National Origin	Condominium	Pending - Awaiting Information from Complainant
04/13/2022	Criminal Background (Race - Black)	Mobile Home	Pending - Awaiting Testing
04/13/2022	Age	5 and Above Multi-Family Housing	Pending - Awaiting Information from Complainant
05/03/2022	Habitability Related Inquiry	1 Single- Family Housing	Landlord-Tenant - Referred to City or Township Building Department



**Table 46: Fair Housing Complaint Activity (2022)**

Date Received	Type of Inquiry	Property Type	Follow Up
06/27/2022	Mental Disability	1 Single- Family Housing	Pending - Awaiting Enforcement Meeting
06/02/2022	Landlord Tenant - Security Deposit	1 Single- Family Housing	Pending - Awaiting Response by Respondent
06/14/2022	Home Purchase, Mortgage or Refinance Related Inquiry	1 Single- Family Housing	Landlord-Tenant - Referred to Housing Commission/HCV Administrator
02/10/2022	Landlord Tenant	5 and Above Multi-Family Housing	Landlord-Tenant - Counseled and Closed (Non-Fair Housing Issue)
06/30/2022	National Origin	Section 8 (HCV)	Pending - Awaiting Testing
7/19/2022	Physical Disability	5 and Above Multi-Family Housing	FHIP Admin. Closed - No Contact After 10-Day Letter
7/6/2022	Landlord Tenant	1 Single-Family Housing	Landlord-Tenant - Referral - Legal Aid
11/15/2022	Retaliation	5 and Above Multi-Family Housing	Advised/Informed of Fair Housing Rights
11/21/2022	Mental Disability	5 and Above Multi-Family Housing	Advised/Informed of Fair Housing Rights
11/21/2022	Landlord Tenant	1 Single-Family Housing	Landlord-Tenant - Referral - Legal Aid
11/29/2022	Landlord Tenant	5 and Above Multi-Family Housing	Landlord-Tenant - Counseled and Closed (Non-Fair Housing Issue)

Source: Fair Housing Center of Metro Detroit (2019-2023)

In 2022, there were 20 cases that reported discrimination against protected classes or similar issues in housing choice. The cases report that Macomb County experienced discrimination of protected classes based on race, disability or handicap, age, and national origin. There were additional reports based on criminal history, retaliation, home purchasing/mortgage/refinancing, and landlord/tenant disputes. Each case received a follow-up where appropriate.

**Table 47: Fair Housing Complaint Activity (2023)**

Date Received	Type of Inquiry	Property Type	Follow Up
02/01/2023	Landlord Tenant	No Data	Landlord-Tenant - Referral - Housing Commission/Housing Agent
02/22/2023	Race	1 Single-Family Housing	Advised/Informed of Fair Housing Rights
03/17/2023	Race	5 and Above Multi-Family Housing	Pending - Awaiting Enforcement Meeting
03/24/2023	Landlord Tenant	5 and Above Multi-Family Housing	Landlord-Tenant - Referral - Legal Aid
04/26/2023	Physical Disability	5 and Above Multi-Family Housing	Reasonable Accommodation Granted

**Table 47: Fair Housing Complaint Activity (2023)**

Date Received	Type of Inquiry	Property Type	Follow Up
05/18/2023	Physical Disability	1 Single-Family Housing	Pending - Awaiting Information from Complainant
06/28/2023	Mental Disability	1 Single-Family Housing	Pending - Awaiting Information from Complainant
06/29/2023	Race	5 and Above Multi-Family Housing	Pending - Awaiting Information from Complainant

Source: Fair Housing Center of Metro Detroit (2019-2023)

Until present, there were eight reported cases of discrimination in Macomb County during 2023. Among the cases reported, three were based on discrimination against disability or handicap and three were based on race. All of the cases were received a follow-up.

While most of the general demographics provided for Macomb County, Michigan are intended to paint a picture of the overall make-up of the community, the information can also point to some issues that may be influencing fair housing conditions and possibly impeding fair housing choice. The continued isolation of certain demographic groups in the County indicates challenges in breaking down racial barriers to foster an environment conducive to integration. Poverty and the myriad challenges that face households experiencing poverty reduces housing choice and often contributes to isolation. Finally, the protected classes continue to experience discrimination and often face more housing problems than other demographics.

Examination of the latest available HMDA data for the Warren-Troy-Farmington Hills MI MSA/MD at the Census Tract level showed that lending practices of financial institutions in the area may be interpreted to be an impediment to fair housing choice for minorities. Although discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements, the data can display patterns in lending practices. In this case, analysis of the data revealed that minority applicants, overall, have lower rate of origination and higher rate of denial. Since analysis of the data cannot conclusively determine a correlation unless a more sophisticated analysis is done, which will take into account other factors affecting underwriting decisions; and since the analysis undertaken for the above-referenced area indicates a certain degree of discrimination in lending based on minority racial/ethnic characteristics of the property location, it may be inferred that lending issues and/or credit issues may play a role in the outcome of the analysis. This outcome calls for a unified approach in which both the private sector and the public sector would work together to first identify the causes for the higher rate of denial and second find a solution.

The AI analysis pointed to an aging population with an increase in elderly residents and fewer households with children. This will have an effect in housing needs and choice. This demographic shift will increase the demand for assisted living units with accessible features and other adaptive changes to

residential buildings. According to the report much of the region's housing stock is designed to meet the needs of families with children. As residents' health, lifestyle and preferences change due to age and physical ability, certain barriers such as narrow doors, hallways, etc. become impediments. Racial and ethnic minorities are concentrated in geographical regions particularly in urban municipalities, where older housing stock is located. Generally speaking, the concentration of racial and ethnic minorities coincides with the concentration of lower income households.

In addition, review of the State of Michigan Building Code, which is the document followed by the County when rehabilitating dwelling units, and review of Michigan Planning Enabling Act – Act 33 of 2008- revealed that there were no specific rules or policies addressing the needs of persons with disabilities except for those persons residing in residential facilities (group homes).

Based on the above and analysis of data available, the following impediments, recommendations, and actions to reduce impediments to Fair Housing within Macomb County have been formulated.

The U.S. Department of Housing and Urban Development requires an identification of the Fair Housing challenges facing the County. To accomplish this task, the identification was based on the intersection of the data collected for the plan, the information gathered during the stakeholder meeting, the results of public comment, and fair housing activity over the course of the past several years. The more a topic intersected within these forms of information, the higher the priority that should be placed.

After the challenges were identified, goals and action items to address fair housing issues were required to be created. Consideration had to be given to certain constraints and/or realities facing the County like staffing, funding, etc.

In addition, the support from local organizations and nonprofits on fair housing issues need to be considered. The results are a set of goals and action items for the five-year period of the plan.

The following are the Fair Housing issues facing Macomb County. The challenges identified are based on the process outlined above.

#### Geographic Isolation of Minorities

- Higher percentages of minority populations within the Macomb County CDBG and ESG jurisdiction tend to be confined to the City of Eastpointe, parts of Mount Clemens and Center Line. While white populations live throughout the County, high percentages of African American Population reside within the City of Eastpointe, parts of Mount Clemens and Center Line. These areas consist of more than 30% African American population. These areas also report a higher poverty rate than the County as a whole.

#### Substandard Housing

- A significant portion of the population suffers from at least one of the following housing issues: crowding, cost burden (greater than 30% or 50%), and other insufficiencies within of the

physical structure. Housing problems are more prevalent among those with a household income below 50% AMI. This is true among both renter and owner-occupied households. Minority populations and larger households experience housing problems at a much higher rate than White households. Black/African American households are the most affected.

#### Discrimination

- There is a lower rate of loan origination among minority populations
- Minority populations had fewer loans originated and greater loan denial than their White counterparts; however, the discrepancies are not extreme. Areas identified to have higher percentages of African American population tend to have a lower number of mortgage loan originations when compared to other areas of the County. Despite that, a discrepancy of this type may impact housing choice for minority populations. Certain populations may be refused rental or directed to a particular neighborhood.
- The County should review their current policies and procedures in light of private sector (e.g., banking, financial institutions, real estate brokers, and insurance companies) practices to determine what, if any, changes might be made to strengthen their role where private sector practices appear to discriminate or otherwise contribute to restricted housing choice. Thus, Macomb County, along with participating communities, should review lending and appraisal practices through formal surveys or informal means to examine their policies, procedures, and practices for possible differential treatment of home mortgage loans, home insurance, or home improvement loans based on race, ethnicity, sex, disability status, and familial status.

#### Affordability Challenges

- Cost of owning homes and paying rent is a burden for many populations. Specifically, those with a household income below 50% AMI. African American households experience cost burden at a much higher rate than White households.
- Placement of new or rehabilitated affordable housing for lower-income people is one of the most controversial issues communities can face. If fair housing objectives are to be achieved, the goal must be to avoid high concentrations of low-income housing. “NIMBYism” seriously affects the availability of housing for low-income families, persons with disabilities, homeless persons, or lower-income minorities and is one of the most difficult challenges jurisdictions encounter in promoting fair housing objectives. The attitude of local government officials, public pronouncements of general policy, and careful planning and implementation of individual housing efforts by providers are key aspects for overcoming resistance of this kind. In addition, contextual planning of new affordable housing with relationship to scale, size, density, and architectural character of the neighborhoods where it will be located is vital to integration and success.

#### Accessibility Challenges

- There is a lack of public transportation for lower income populations within Macomb County (especially north of M-59), as well as lack of affordable housing in proximity to job centers.

#### Fair Housing Awareness and Education

- There is a lack of awareness of Fair Housing practices among landlords and the general public. This is a continued struggle for communities to adequately provide education and awareness specific to fair housing.
- Complaints Filed Specific to Rental Housing

- A number of complaints were filed since 2019 specific to those being refused rental housing. The types of inquiries include those claiming discrimination based on a disability, race, and familial status.

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## 7.0 IMPEDIMENTS AND ACTION ITEMS

### 7.1 IMPEDIMENT #1 – ENSURE FAIR HOUSING REPORTS ARE SHARED WITH LENDING INSTITUTIONS, HOUSING PROVIDERS, AND PARTICIPATING COMMUNITIES

**Action:** *Increase efforts to provide fair housing reports to the public and private sectors, initiate dialogue, and solicit assistance.*

**Recommendation #1:** Macomb County should make the AI and preceding fair housing reports available to all lending institutions in the study area. The purpose of the dialogue is to discuss the impediments to fair housing, assess fair housing efforts, and seek commonality and participation in fair housing efforts.

**Recommendation #2:** The findings and reports from the Fair Housing Center of Metropolitan Detroit should be shared with housing providers, community development corporations, developers, lenders, participating communities and other stakeholders. Macomb County is involved in the SE Michigan Housing Task Force. Impediment #1 is linked to Impediment #2, as noted below.

**Recommendation #3:** Initiate dialogue with local lending institutions and seek their commitment and assistance in responding to the findings in the AI and other fair housing reports. After the AI is made available to the local lending institutions; a dialogue should be initiated aimed at seeking their commitment to participate in the dissemination of fair housing information and education for the responsible use of credit.

### 7.2 IMPEDIMENT #2 – LACK OF FAIR HOUSING EDUCATION, AWARENESS, AND INFORMATION WITHIN THE PUBLIC SECTOR AND THE PRIVATE SECTOR

The County has started efforts to disseminate fair housing information to public housing agencies, municipalities and the public. However, a review of the County and lending institutions websites revealed that fair housing education, housing discrimination complaint resources, and other fair housing-related information is scarce.

**Action:** *Improve coordination of Fair Housing Education Efforts through deliberate and targeted strategies.*

**Recommendation #4:** The County should include links on its website to agencies that provide fair housing information or services such as the Fair Housing Center of Metropolitan Detroit and the Fair Housing and Equal Opportunity (FHEO) Office of HUD.

**Recommendation #5:** The County should request that all Urban County participating communities and those communities participating in the HOME Consortium include fair housing information on their website, link to fair housing agencies, and fair housing information in applications for funding, including the fair housing logo and where to file fair housing complaints.

**Recommendation #6:** The County should request all Urban County participating communities that have Housing Commissions (cities of Eastpointe, Mount Clemens and New Haven) to encourage the Housing Commissions to post fair housing information on their websites, at the housing developments, and in applications for funding, including the fair housing logo and where to file fair housing complaints.

**Recommendation #7:** The County should coordinate with local lending institutions for the provision of fair housing information and housing and credit counseling information through its website. The County should include fair housing information in their main website. Additionally, links to other entities offering housing and credit counseling should be enabled as well.

**Action: Increase efforts to disseminate fair housing information and educate local officials, employees and residents on fair housing laws**

**Recommendation #8:** The County should use existing resources and programs to disseminate fair housing information and provide fair housing education on fair housing laws and best practices to local officials, landlords, and the general public. The County should utilize other media outlets and avenues to disseminate fair housing information to the public, among others: cable TV, newsletters, pamphlets, fairs, and public announcements. The County should include fair housing information in related training opportunities and meetings with participating communities.

**Recommendation #9:** The County should request and use HUD Technical Assistance in implementing strategies to further fair housing.

**Action: Increase the availability of fair housing materials through electronic means and ensure that the fair housing logo and fair information is included in all related housing materials.**

**Recommendation #10:** The County should request participating communities and public housing agencies to include fair housing logo and information in all materials in electronic format.

Steps to achieve some of these recommendations has been accomplished during the previous AI. The County should continue to strive to achieve the above stated recommendations. It is anticipated that this coordination can start during the first year of implementation of the AI. Posting of the fair housing and credit counseling information in the website is anticipated to occur during the second year of the AI and posting of the fair housing and credit counseling information in the local lending institutions is anticipated to occur during the third year of the AI and should be monitored on an ongoing basis as bank mergers occur.

### 7.3 IMPEDIMENT #3 – RACIAL AND ETHNIC MINORITIES ARE CONCENTRATED GEOGRAPHICALLY WITHIN THE COUNTY

According to 2017-2021 ACS data, the number of minority residents within Macomb County continues to rise. The most substantial increases are within the Asian, Hispanic, and African American populations.

The County should look into the real estate practices, and the home-seeking choices made by African American and disabled residents to determine the extent of perceived or actual unlawful discriminatory practices, since those two groups are under-represented in the general population.

**Action:** *Review regulations and policies that may have an impact on the location, cost and supply of housing.*

**Recommendation #11:** The County should use existing public education programs, advocacy groups and regional groups such as the Southeast Michigan Housing Task Force, the Fair Housing Center of Metro Detroit, and HUD to spread information about the positive effects of affordable housing on local communities and help dispel myths.

**Recommendation #12:** The County, with participating communities, should increase local educational campaign on the community benefits of providing affordable and inclusive housing options.

### 7.4 IMPEDIMENT #4 – AVAILABILITY OF AFFORDABLE HOUSING FOR PROTECTED CLASSES

Challenges for providing new affordable housing within much of the Macomb County CDBG Jurisdiction are cost of land (especially north of M-59), NIMBY-ism, and lack of a coordinated effort and funding to develop programs to address affordable housing.

Efforts to address the future increase in demand for affordable housing have been one charge of the Macomb County Department of Planning and Economic Development (MCPED) and Macomb Community Action through initiatives seeking to establish collaborative efforts with key stakeholders throughout the County, Region, and State in order to address the evolving need of Macomb County's population.

Macomb County responded to the need for affordable housing by making it a priority need and seeking to address housing concerns in the coming years.

Recent coordination between Macomb County and participating jurisdictions is encouraging the participation by some participating communities in the purchase of tax foreclosed homes with the intent of rehabilitating homes and marketing them to income qualified individuals to increase affordable housing stock.

Current policy requires a community to purchase all tax foreclosures within it's boundaries in a given year to participate. This could prove troublesome and discourage some communities from participating.



**Action: Encourage the development affordable housing for the persons included in the protected classes**

**Recommendation #13:** To address the increasing demand for affordable housing the County should work with participating communities, developers, and housing providers to develop programs that could rehabilitate existing tax forecloses homes to bring them back into functional use.

## 7.5 IMPEDIMENT #5 – ADA EDUCATION

Much like the State of Michigan as a whole, Macomb County has an aging population. As a result, the rate of individuals requiring accessibility accommodations is increasing. Some efforts have been made over the previous AI to encourage participating communities to utilize CDBG funding for ADA improvements within their respective communities.

**Action: Continue and Evaluate and Improve ADA Education**

**Recommendation #14:** The County should provide ADA education to their employees; provide contractors and builders with information packets regarding ADA requirements; post requirements on the County and City website, respectively; and incorporate ADA requirements in the development review and permitting process of housing construction and rehabilitation.

**Recommendation #15:** Continue funding the Macomb County Accessibility Program. This is a grant-funded program designed to make site-built residential homes in Macomb County more accessible to residents in need. This program currently serves eligible residents throughout the 21 participating Macomb County Communities.

## 7.6 IMPEDIMENT #6: LACK OF FORMALIZED FAIR HOUSING COMPAINT AND MONITORING PROCEDURES

Although the County makes referrals for those who have experienced discrimination related to fair housing choice, the County does not have a formal fair housing complaint procedure.

Additionally, although the County monitors participating communities and sub-recipients, fair housing is not currently addressed during the monitoring process.

**Action: Work to prepare a formalized fair housing complaint procedure and fair housing monitoring procedures**

**Recommendation #16:** Macomb Community Action should work with the Macomb County Corporate Counsel and other relevant staff to prepare to procedure for filing fair housing complaints from residents. Additionally, the County should make this procedure and any resulting forms and documents available to participating communities.

**Recommendation #17:** Develop and implement a sub-recipient fair housing monitoring policy.

## 7.7 IMPEDIMENT #7: INCREASED COMPLAINT ACTIVITY WITHIN PARTICIPATING COMMUNITIES IN RECENT PROGRAM YEARS

Fair Housing Complaint Data collected from the Fair Housing Center of Metro Detroit shows an increase in complaint activity within recent years. The majority of the complaint activity is based on disability status and race.

***Action: Coordinate fair housing efforts within communities where complaint activity has increased***

**Recommendation #18:** Macomb Community Action should work with participating communities where fair housing complaint activity has increased to understand the root cause for the increase. Additionally, the County should focus fair housing education, awareness, and programs within areas where fair housing choice may be an issue.

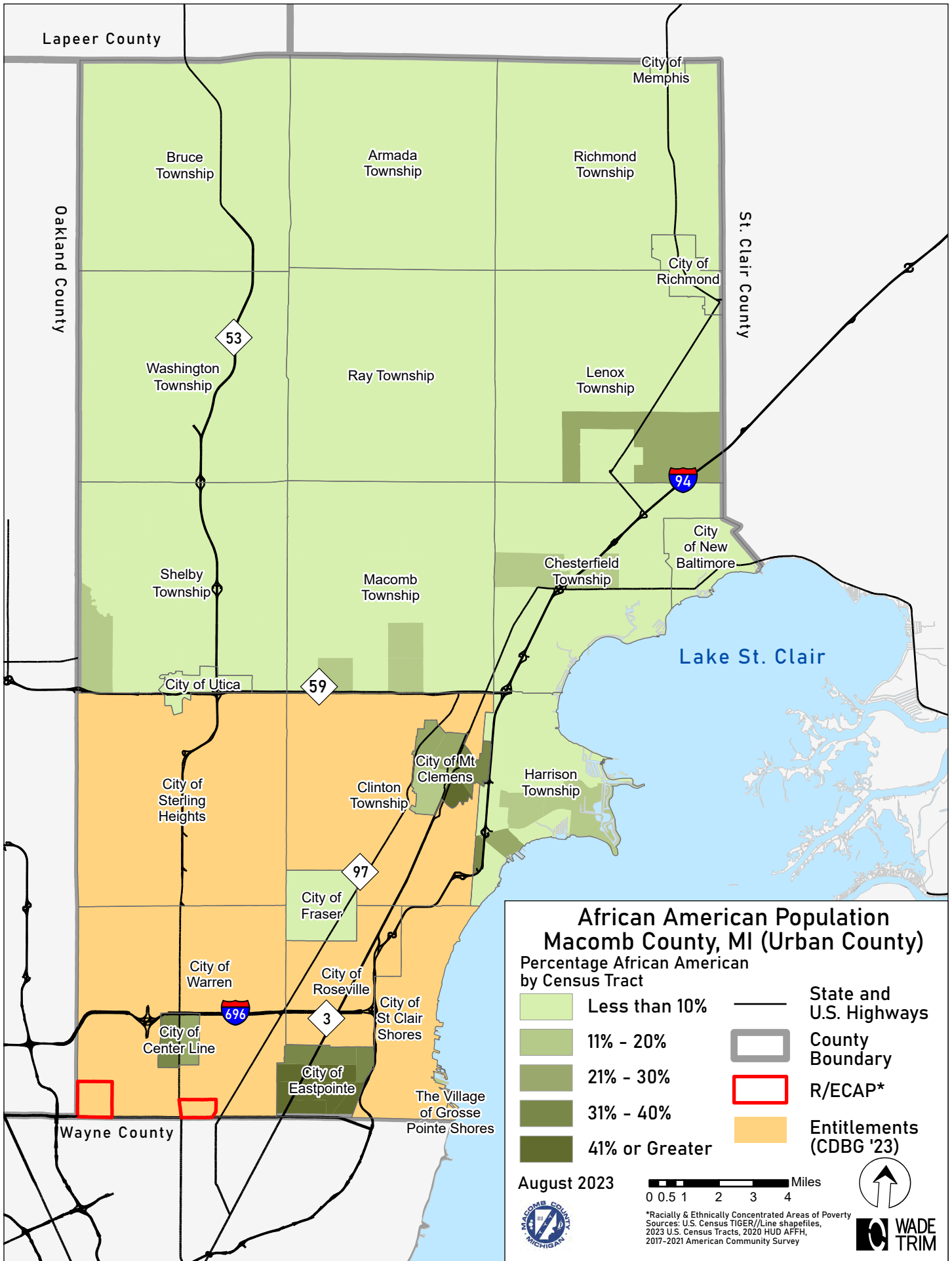
**Recommendation #19:** Develop and implement competitive funding allocation process, including fair housing-related criteria, for sub-grants to municipalities participating in the Urban County CDBG and/or County-led HOME Consortium.

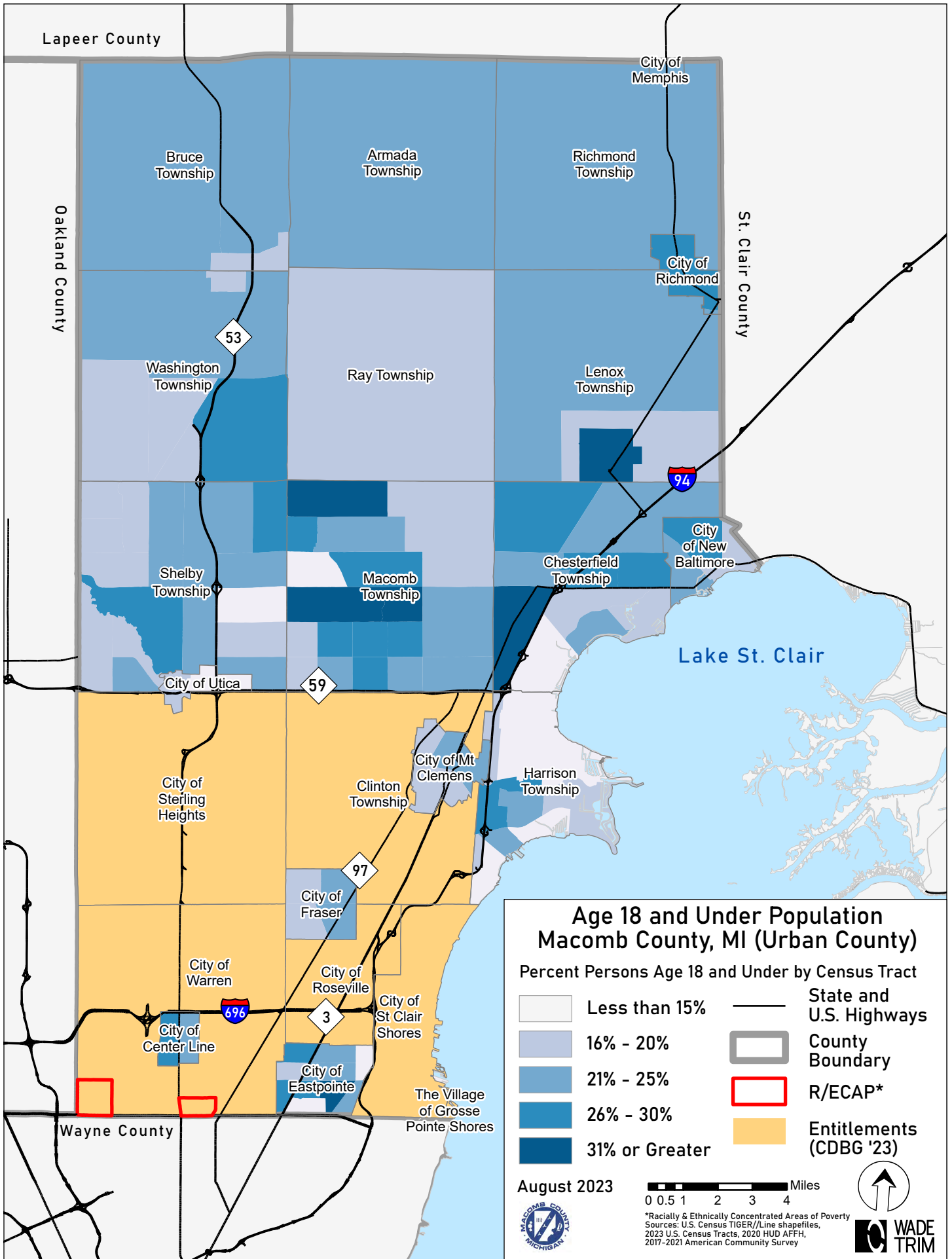
DRAFT

### LIST OF MAPS

1. African American Population Map
2. Hispanic or Latino Population Map
3. Other Minority Race Population Map
4. Age 18 and Under Population Map
5. Age 65 and Over Population Map
6. Poverty Status Map
7. Poverty Status for Minority Populations Map
8. Low- and Moderate-Income Areas Map
9. Disability Status Map
10. Renter Occupied Units Map
11. Population Density by Race/Ethnicity (Integration) Map

DRAFT





### Age 18 and Under Population Macomb County, MI (Urban County)

Percent Persons Age 18 and Under by Census Tract

- Less than 15%
- 16% - 20%
- 21% - 25%
- 26% - 30%
- 31% or Greater
- State and U.S. Highways
- County Boundary
- R/ECAP\*
- Entitlements (CDBG '23)

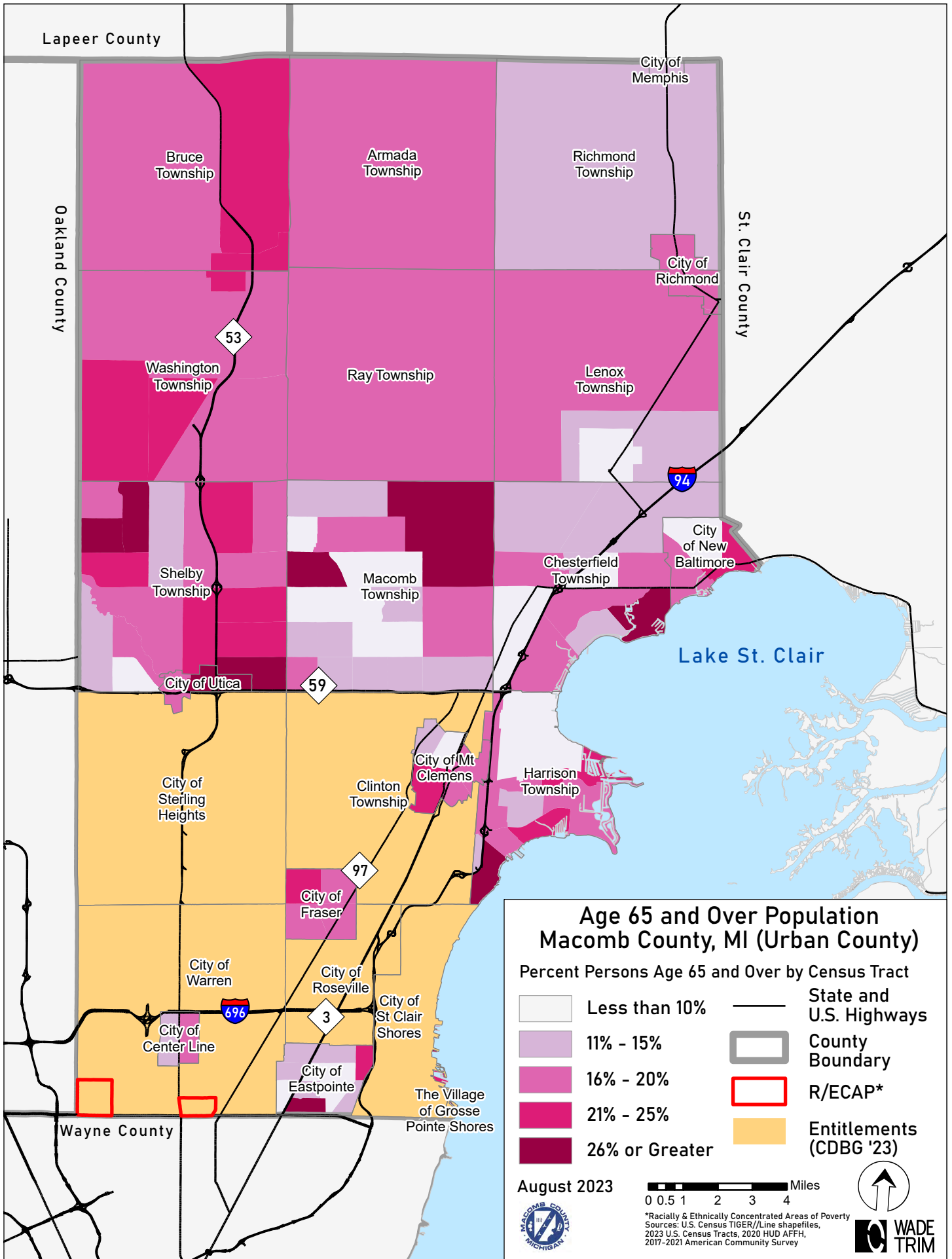
August 2023

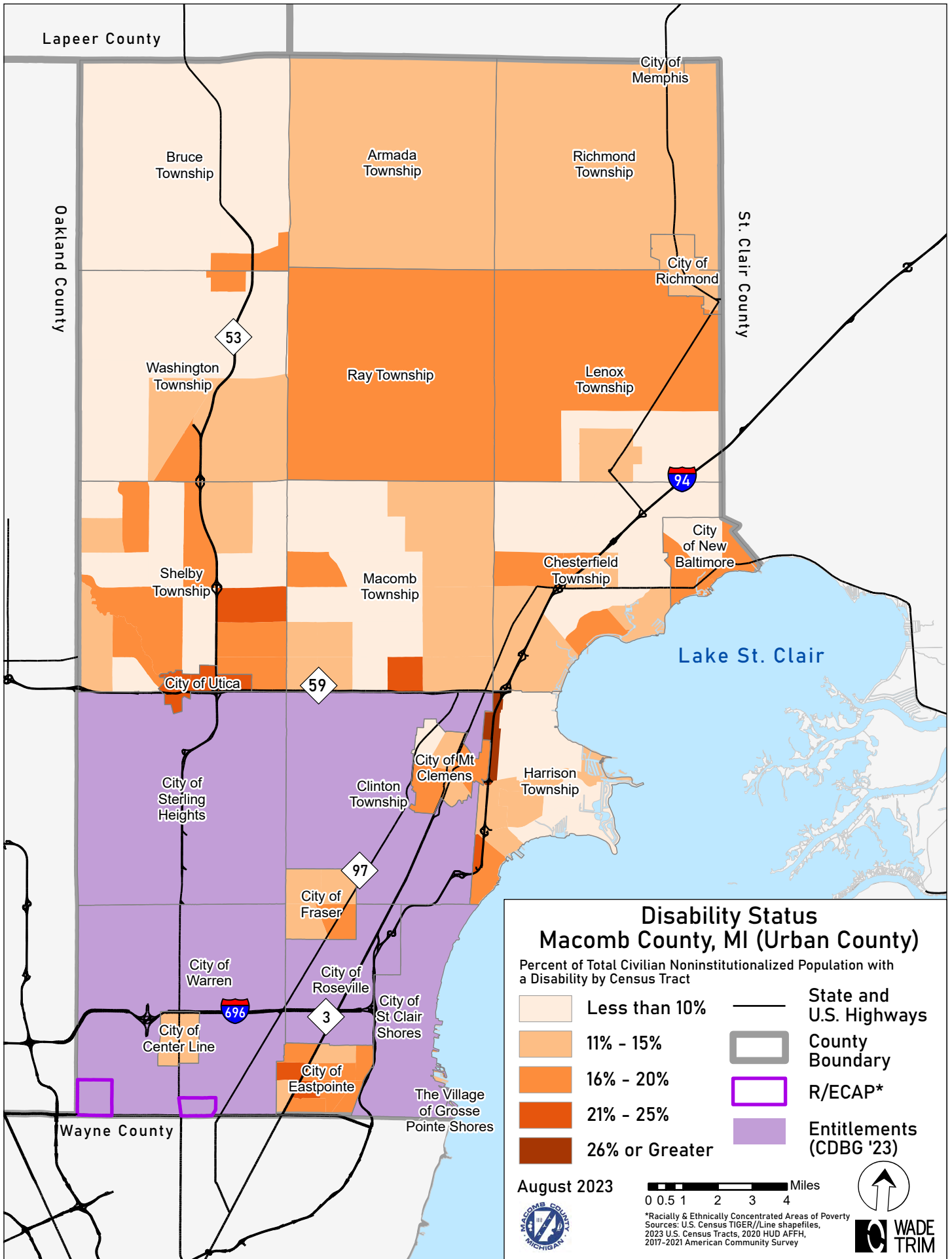
0 0.5 1 2 3 4 Miles



\*Racially & Ethnically Concentrated Areas of Poverty  
Sources: U.S. Census TIGER//Line shapefiles, 2023 U.S. Census Tracts, 2020 HUD AFFH, 2017-2021 American Community Survey







### Disability Status Macomb County, MI (Urban County)

Percent of Total Civilian Noninstitutionalized Population with a Disability by Census Tract

- Less than 10%
- 11% - 15%
- 16% - 20%
- 21% - 25%
- 26% or Greater
- State and U.S. Highways
- County Boundary
- R/ECAP\*
- Entitlements (CDBG '23)

August 2023

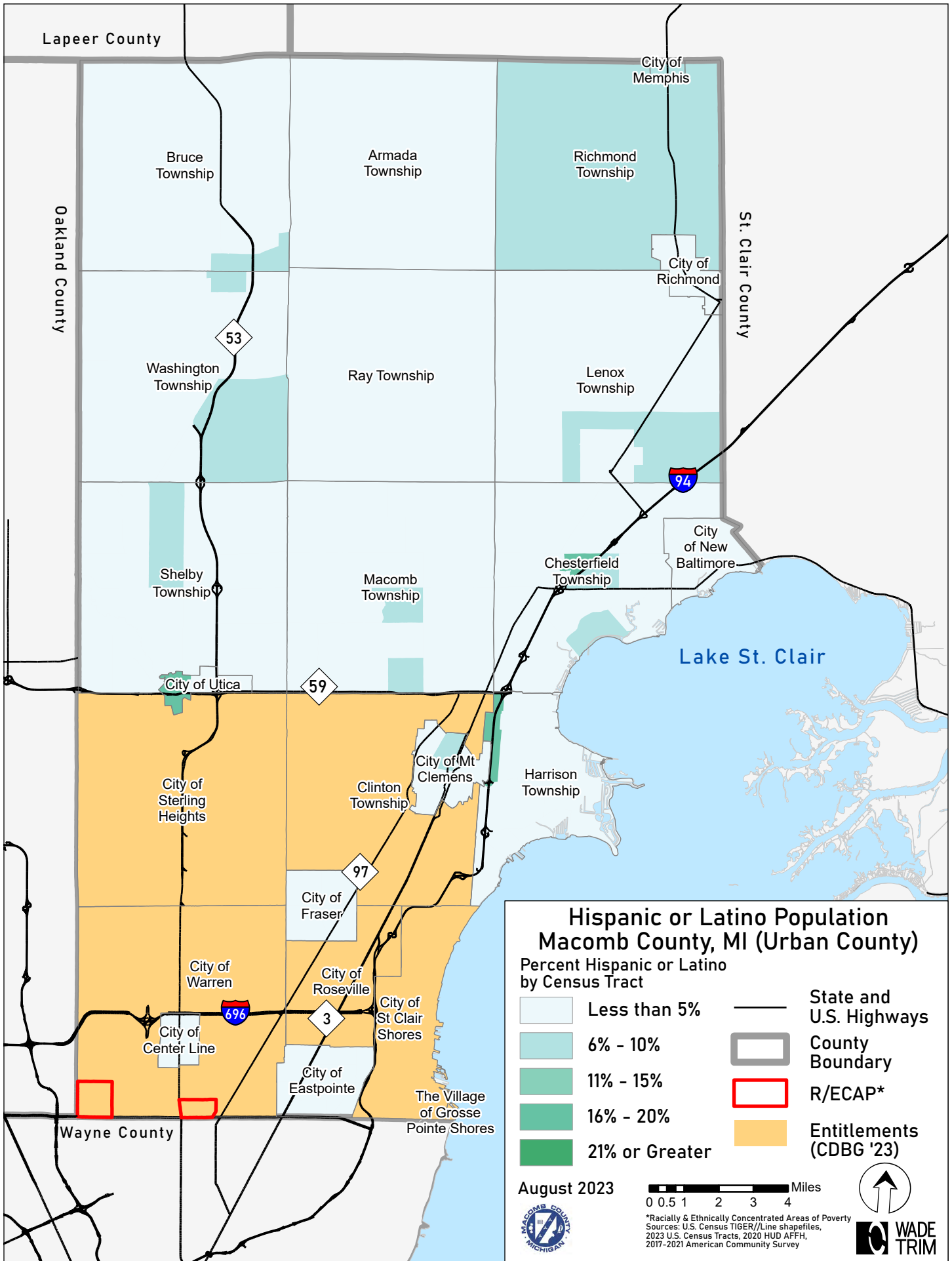
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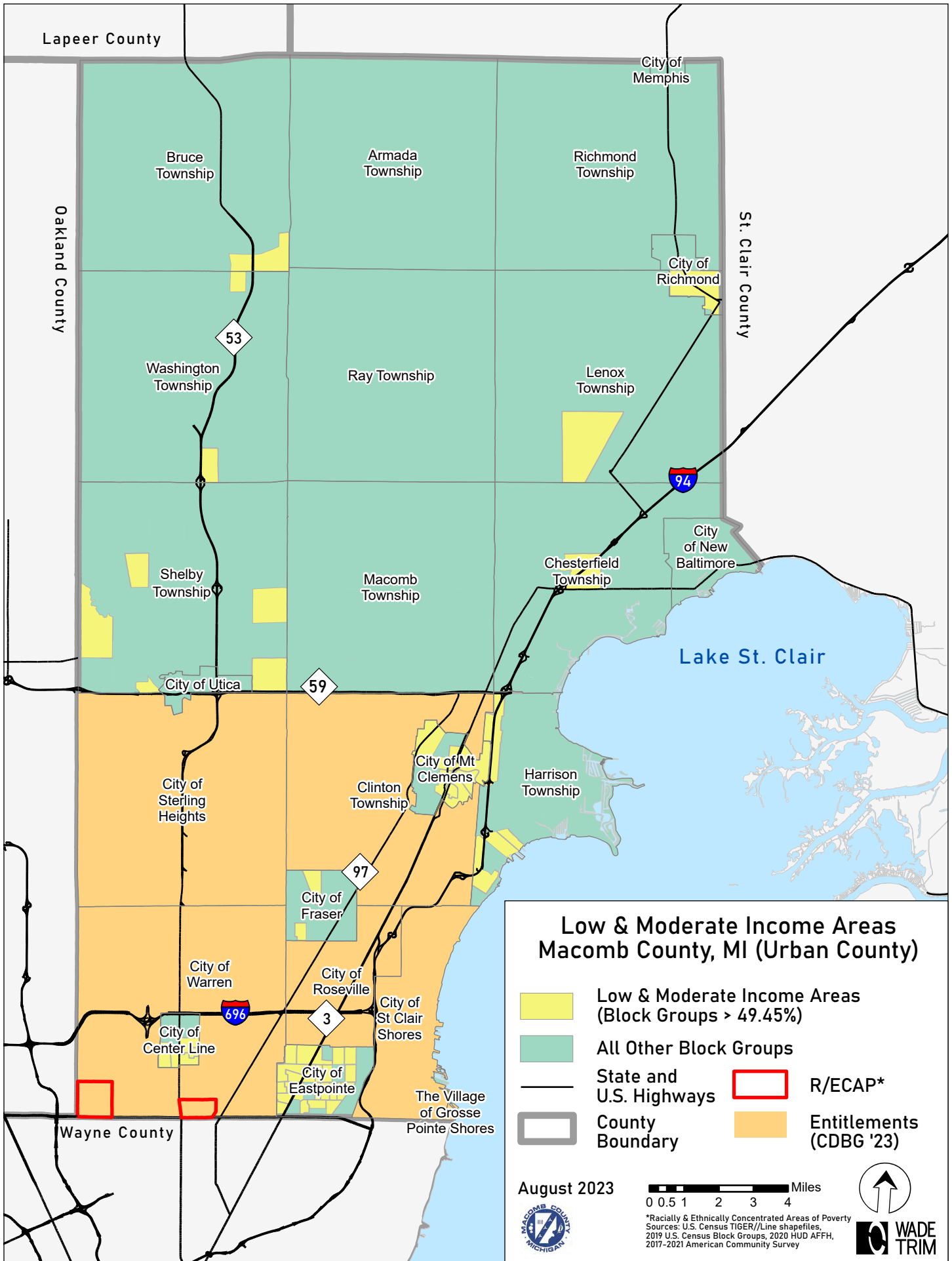
\*Racially & Ethnically Concentrated Areas of Poverty  
Sources: U.S. Census TIGER/Line shapefiles, 2023 U.S. Census Tracts, 2020 HUD AFFH, 2017-2021 American Community Survey

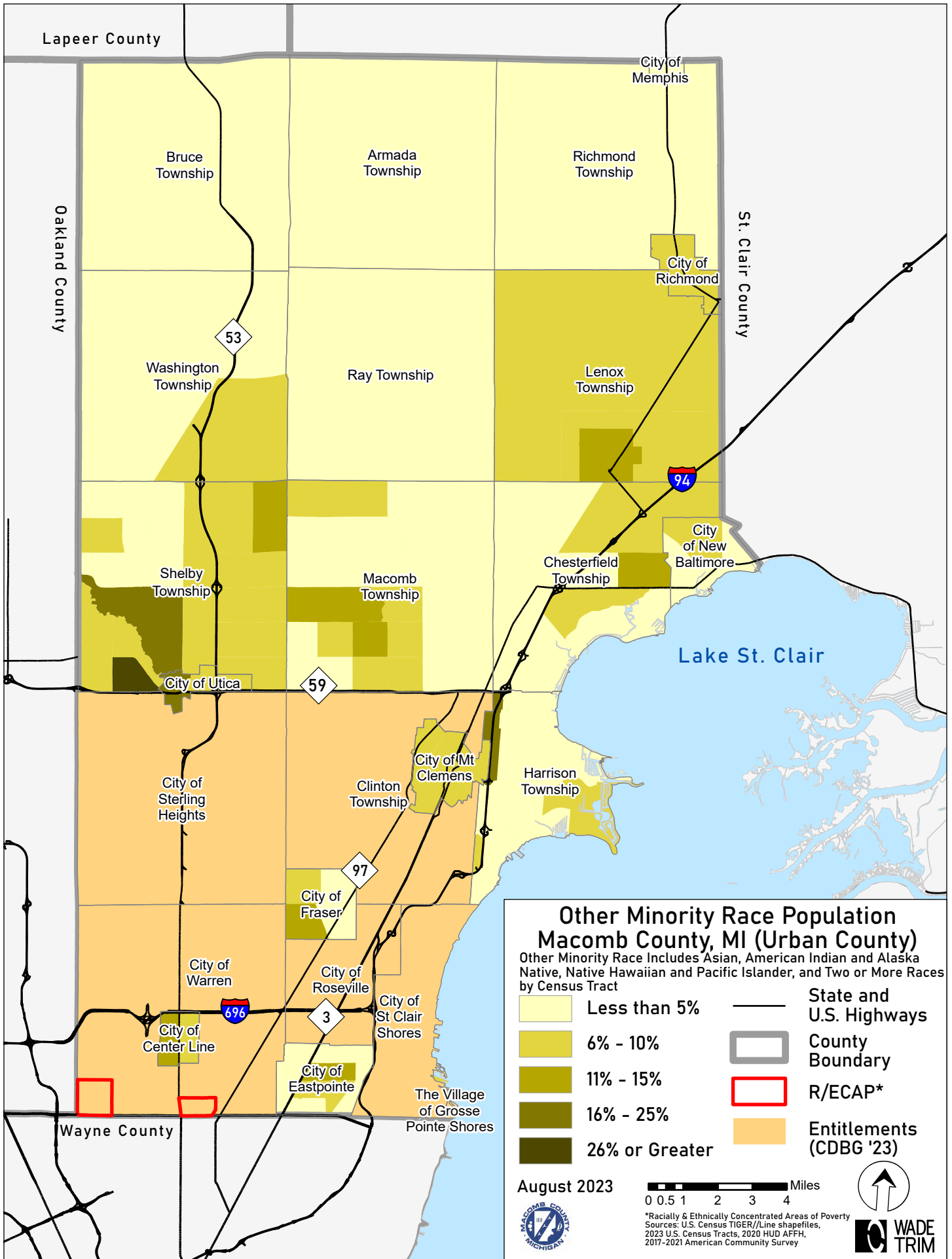


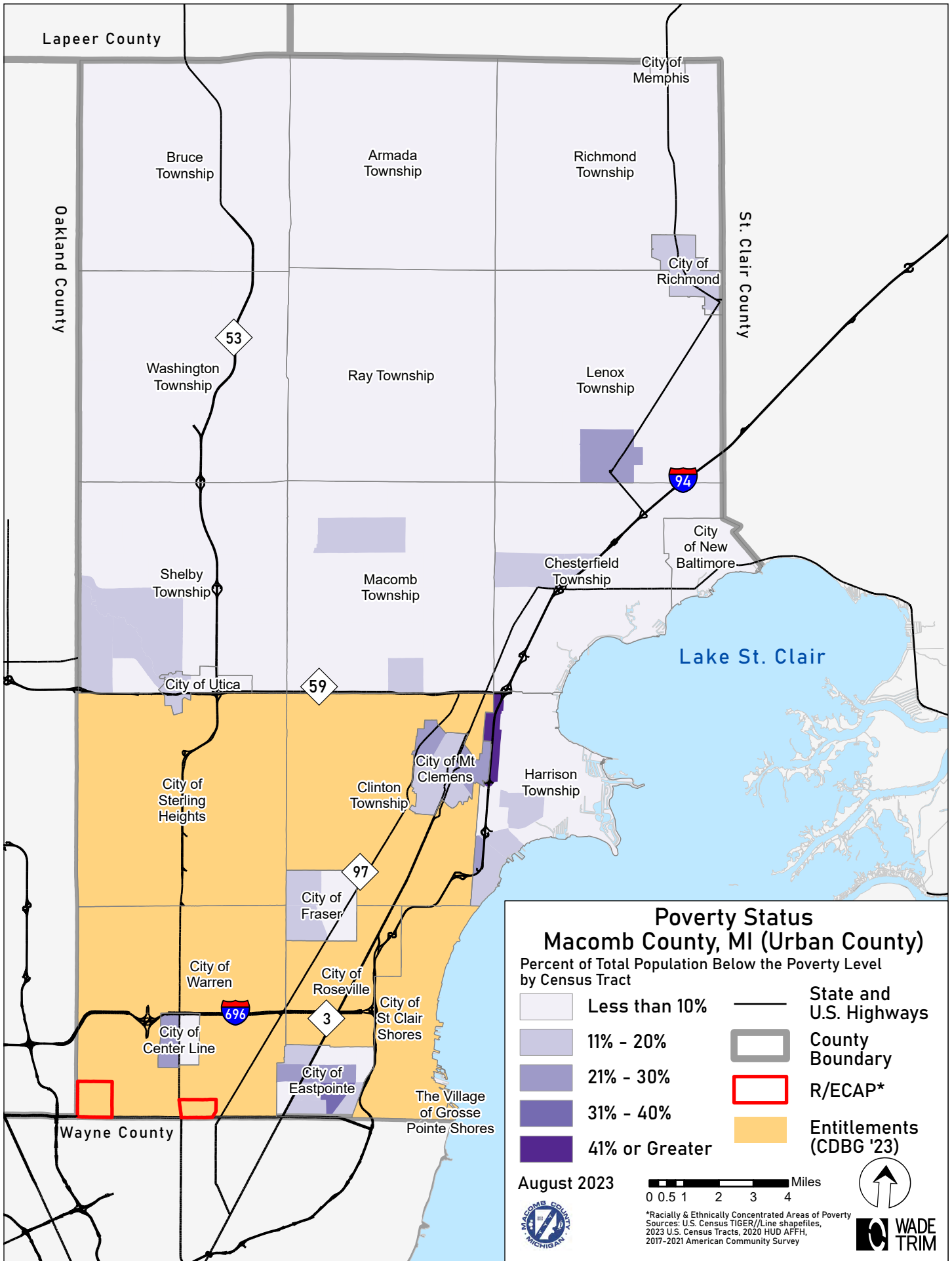












### Poverty Status Macomb County, MI (Urban County)

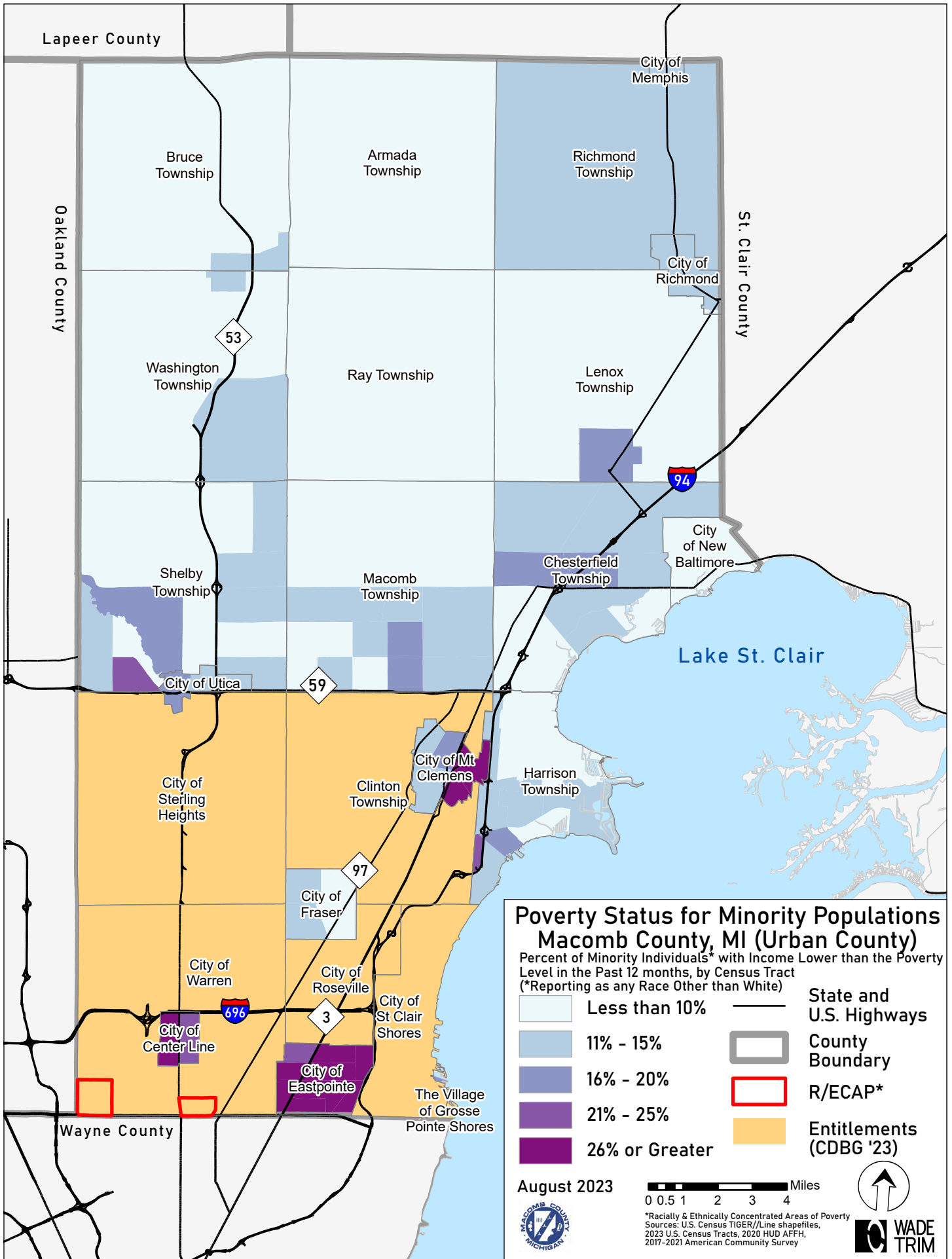
Percent of Total Population Below the Poverty Level  
by Census Tract

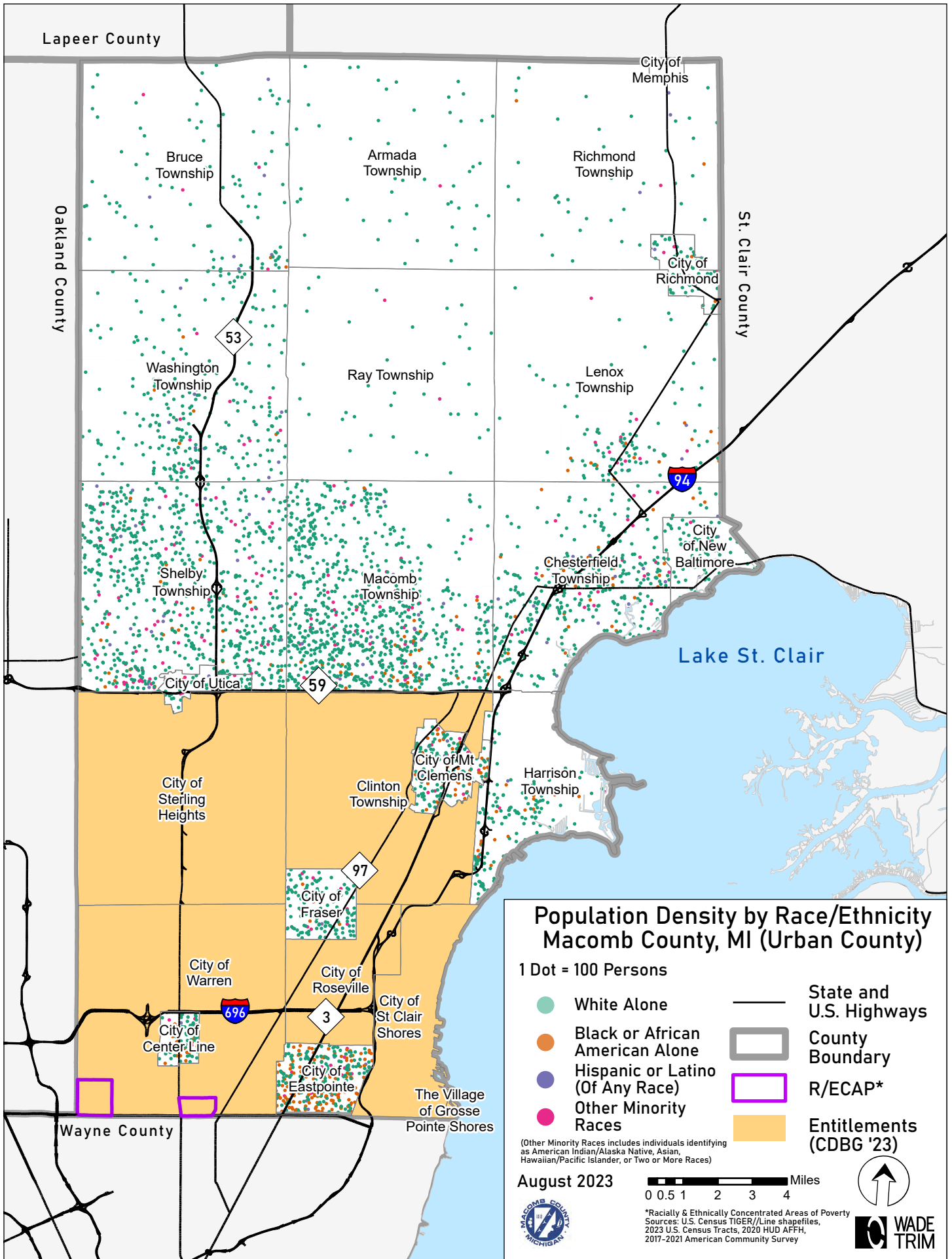
	Less than 10%		State and U.S. Highways
	11% - 20%		County Boundary
	21% - 30%		R/ECAP*
	31% - 40%		Entitlements (CDBG '23)
	41% or Greater		

August 2023

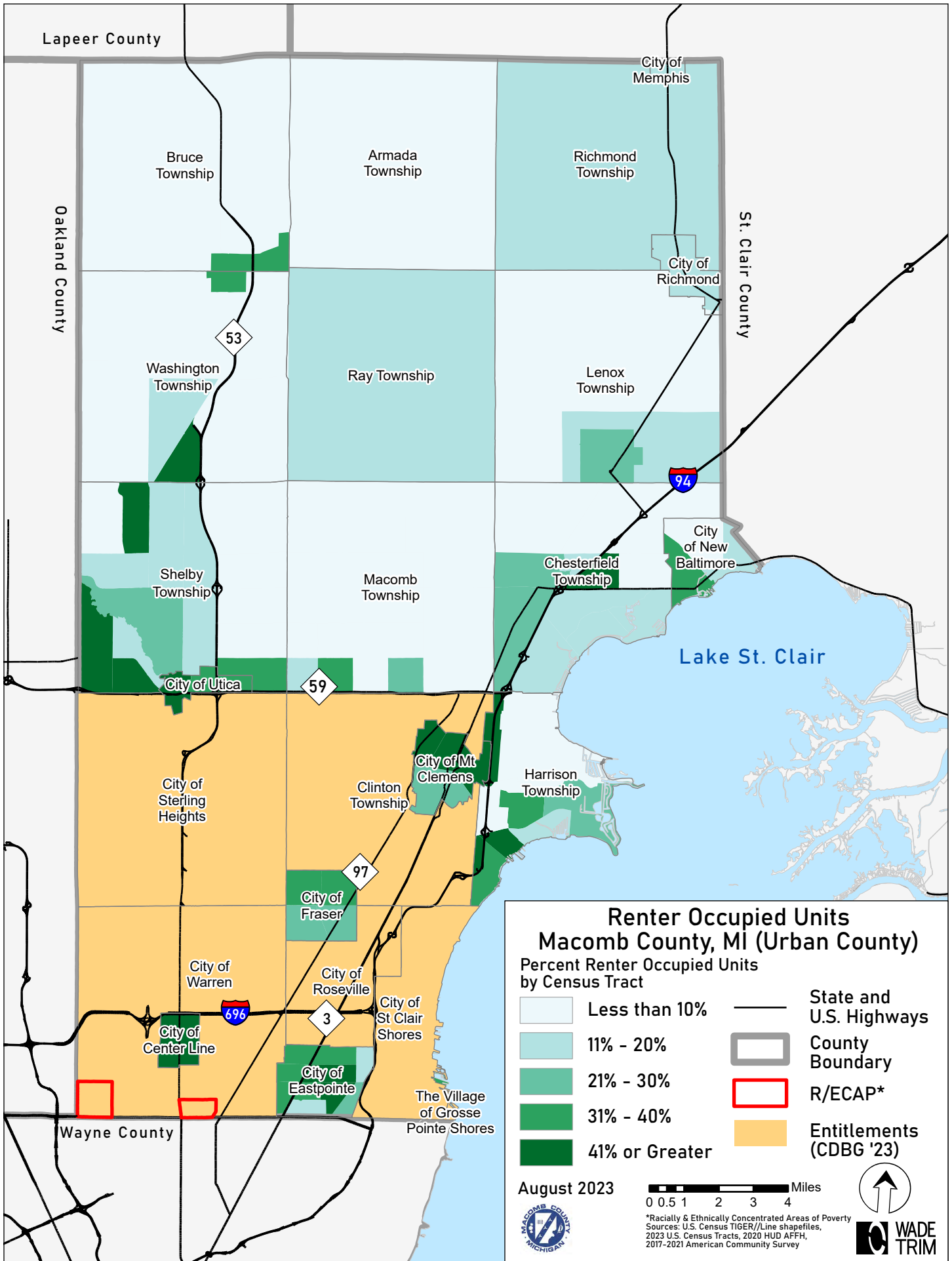
0 0.5 1 2 3 4 Miles

\*Racially & Ethnically Concentrated Areas of Poverty  
Sources: U.S. Census TIGER/Line shapefiles,  
2023 U.S. Census Tracts, 2020 HUD AFFH,  
2017-2021 American Community Survey









# NOTICE OF PUBLIC MEETING

## ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Communities which receive federal funds are required by the U.S. Department of Housing and Urban Development (HUD) to complete an Analysis of Impediments to Fair Housing Choice (AI) every five years. **HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.**

Macomb County will hold an open house meeting to inform Macomb County residents about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.

Date/Time	Location	Target Audience
August 9, 2023 at 10:00 am	Senior Auditorium, 21885 Dunham Road, Clinton Township, MI	General Public

The AI will cover the jurisdiction of the Macomb Urban County Community Development Block Grant program which includes all Macomb County communities with the exception of the cities of Sterling Heights, Roseville, Warren and St. Clair Shores and the Charter Township of Clinton.

Persons living and working in Macomb County are encouraged to attend and provide input. Anyone unable to attend these meetings but wishing to make their views known may do so by submitting written comments to:

Macomb County Planning and Economic Development  
Attn: Stephanie Burgess, Program Manager  
1 South Main Street, 7th Floor  
Mount Clemens MI, 48034

Comments may also be submitted via email to [stephanie.burgess@macombgov.org](mailto:stephanie.burgess@macombgov.org) or telephone (586) 466-6256. Finally, an online survey is being conducted to receive input. The survey will be available through August 25, 2023. The link to the survey can be found here:

<https://www.surveymonkey.com/r/MacombAI>

Reasonable accommodations will be made for individuals with disabilities or persons with Limited English Proficiency requiring auxiliary aids or services. Persons needing a special accommodation to participate should contact Stephanie Burgess, Program Manager at the address and/or contact information provided above. Requests must be received at least (5) working days prior to the meeting date.

***Mark A. Hackel***  
***Macomb County Executive***

***Mark Deldin***  
***Deputy County Executive***



## **Analysis of Impediments to Fair Housing Choice Public Meeting**

August 9, 2023 | 10:00am  
Senior Auditorium  
21885 Dunham Road  
Clinton Township, MI 48036



### **Summary: Public Meeting**

Macomb County is in the process of updating the Analysis of Impediments to Fair Housing Choice to develop an action plan to mitigate impediments to fair housing choice within the Macomb County.

On August 9, 2023, the County conducted a public meeting for fair housing which was located in the Macomb County Senior Auditorium.

In an effort to provide an environment that would allow for all attendees to participate, an open discussion where citizens were asked to discuss issues and concerns publicly was conducted along with printed surveys and an online survey option.

### **Open Discussion**

During the open discussion citizens were asked to speak their mind on fair housing issues and concerns affecting their respective community. Through this process many Macomb County residents and service providers spoke out. A number of issues were brought to the Project Team's attention. Listed below are issues that were discussed during the open discussion:

### **Fair Housing Needs and Concerns**

- Encourage communities to provide fair housing information as part of rental registration process.
- Better fair housing educations and access for renters
- Have more readily available details on complaint process and where to turn when an individual experiences housing discrimination.
- Education for Landlords
- Accessibility in older buildings/units
- Affordable Housing
  - Cost of new homes too high (property costs, home values, interest rates etc.)
  - Lack of supply
- Encourage communities to review regulatory impediments to fair housing such as zoning and restrictions on building smaller homes.

For questions regarding the Analysis of Impediments to Fair Housing Choice and other fair housing concerns, please contact Stephanie Burgess, at 586.466.6256 or [stephanie.burgess@macombgov.org](mailto:stephanie.burgess@macombgov.org).

Macomb County Planning and Economic Development  
Stephanie Burgess, Program Manager  
1 South Main Street, 7th Floor  
Mount Clemens MI, 48034

Analysis of Impediments to Fair Housing Choice - Public Outreach Meeting  
August 9, 2023 | 10:00am  
Senior Auditorium  
21885 Dunham Road  
Clinton Township, MI 48036



SIGN-IN SHEET  
(Please Print Clearly)

NAME	NEIGHBORHOOD/GROUP/AGENCY	ADDRESS	EMAIL/PHONE
Karan Babchani	Hearts 4 Homes	Karanbg@hearts4homes.org	
Christa Carpenter	Hearts 4 Homes	Christa@hearts4homes.org	
Rick Weber	Erie's Office MAP	R	
Julie Hintz	MEA	julie.hintz@macombgov.org	
JASON SMITH	WT	jsmith@wadevsn.com	
Roshindah Terzin	PCDC	terzinpcdc@equal.com	
DAsia McDonald	OIHSA	dasicam@oihsc.org	





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Cat. 563



- FAIR HOUSING INFO AS PART OF RENTAL REGISTRATION
- MORE EDUCATION FOR RENTERS
- BETTER COMMUNICATE COMPLAINT PROCESS
- AFFORDABILITY
  - PROPERTY COST
  - VALUES
  - INTEREST RATES
  - etc.
- ZONING REGULATION RESTRICTS SMALLER HOMES





**2023 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE  
AI FAIR HOUSING SURVEY  
July 24, 2023 – August 29, 2023**

**SURVEY SUMMARY**

Macomb County is in the process of drafting an Analysis of Impediments to Fair Housing Choice (AI) to affirmatively further Fair Housing in the County's CDBG Entitlement jurisdiction. The study area for the AI includes the following Macomb County communities: the Villages of Armada, New Haven, and Romeo; the Townships of Armada, Bruce, Chesterfield, Harrison, Lenox, Macomb, Ray, Richmond, Shelby and Washington; and the Cities of Center Line, Eastpointe, Fraser, Mount Clemens, New Baltimore, Richmond and Utica. Macomb County conducted a Fair Housing Survey during July and August 2023 to collect input and comments related to the Analysis of Impediments to Fair Housing Choice.

The survey was intended to collect information regarding housing needs in Macomb County, to identify any Fair Housing issues and concerns, to educate respondents regarding Fair Housing activities, and to gauge familiarity with Macomb County's programs and resources regarding Fair Housing. The survey was made available in hard copy form and online. The Fair Housing Survey included 25 questions in a multiple-choice and open-ended question format. An example of the survey is attached.

The online survey was publicly posted and made available on the County's website on July 24, 2023 and kept open until August 29, 2023. Additionally, the survey was emailed directly to communities within the study area and many non-profit service providers and stakeholders. Paper copies of the survey were distributed to attendees of the first public meeting held on August 9, 2023. Meeting attendees were also encouraged to invite friends and neighbors to take the online survey, and additional paper copies of the survey were made available upon request. Links to the survey were also printed on all handouts distributed at the public meeting.

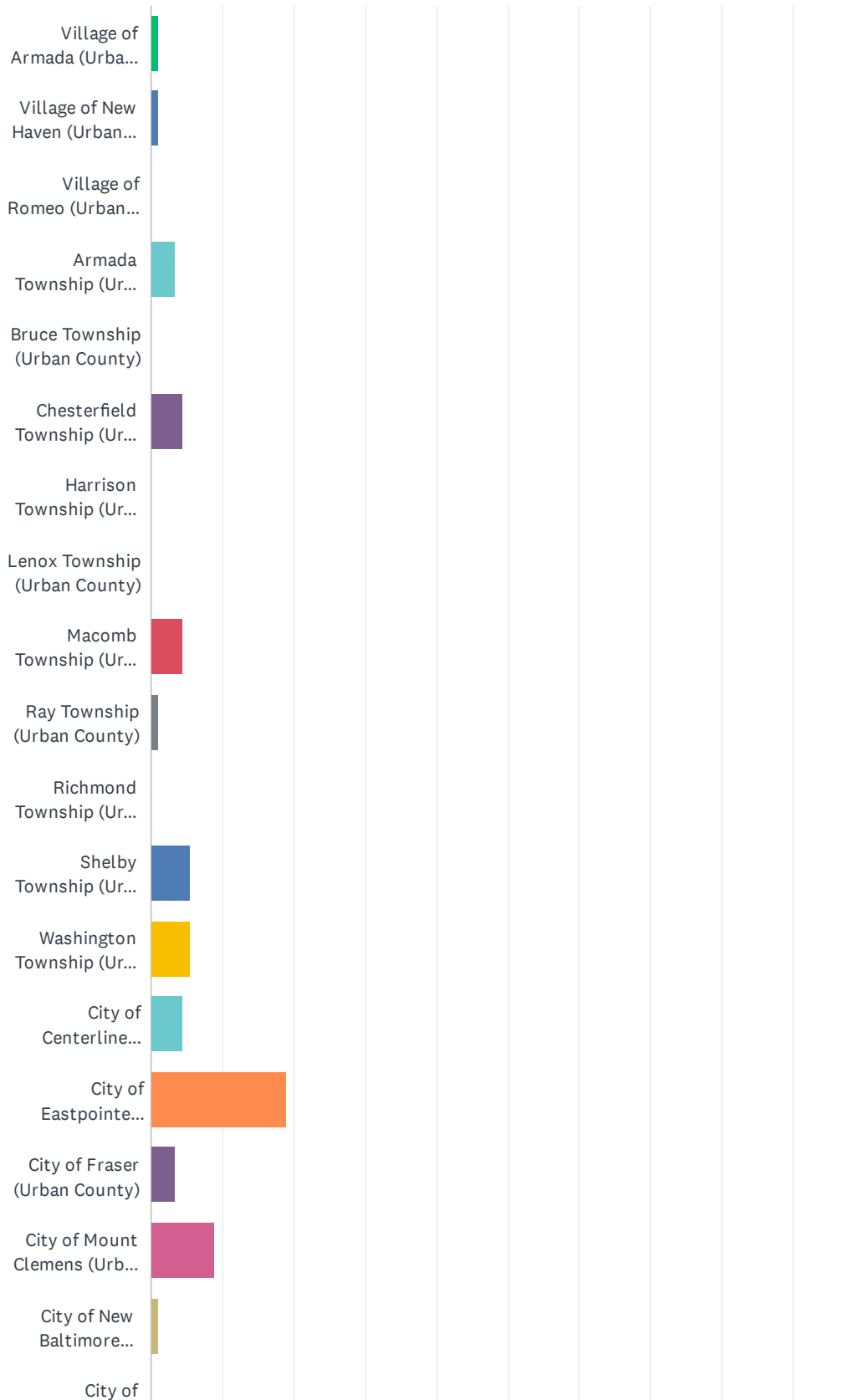
The survey was closed, and results were tallied during the week of August 29, 2023. In total, 90 surveys (electronic and paper) were returned at the end of survey period. Attached are the survey results.

For questions regarding the Analysis of Impediments to Fair Housing Choice, please contact Stephanie Burgess at : (586) 466-6256 or [stephanie.burgess@macomb.gov.org](mailto:stephanie.burgess@macomb.gov.org).

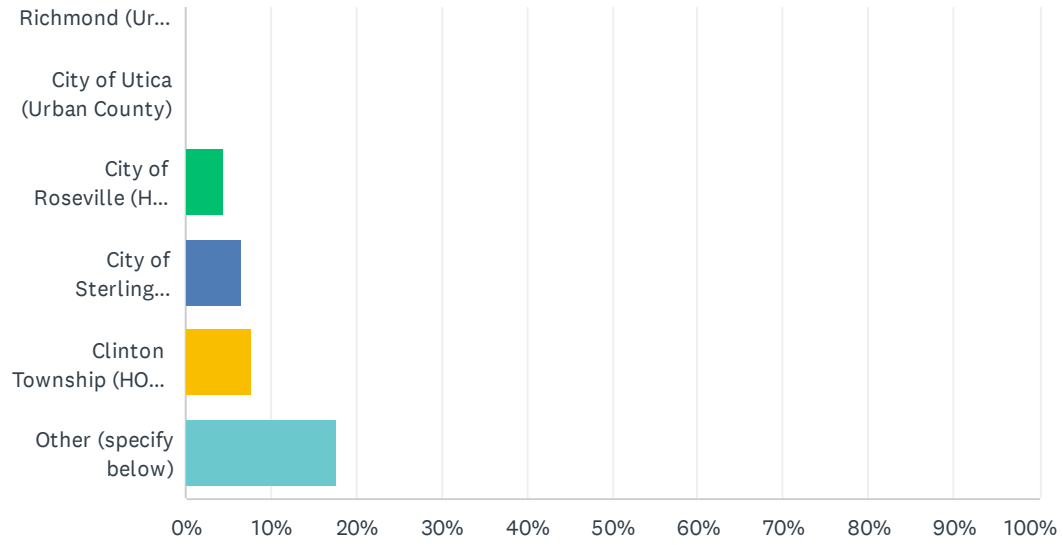
More information can be found at <https://mca.macombgov.org/MCA-CommunityServices-Documents>

# Q1 Where do you live?

Answered: 90 Skipped: 0



# Analysis of Impediments to Fair Housing Choice Survey



## Analysis of Impediments to Fair Housing Choice Survey

ANSWER CHOICES	RESPONSES	
Village of Armada (Urban County)	1.11%	1
Village of New Haven (Urban County)	1.11%	1
Village of Romeo (Urban County)	0.00%	0
Armada Township (Urban County)	3.33%	3
Bruce Township (Urban County)	0.00%	0
Chesterfield Township (Urban County)	4.44%	4
Harrison Township (Urban County)	0.00%	0
Lenox Township (Urban County)	0.00%	0
Macomb Township (Urban County)	4.44%	4
Ray Township (Urban County)	1.11%	1
Richmond Township (Urban County)	0.00%	0
Shelby Township (Urban County)	5.56%	5
Washington Township (Urban County)	5.56%	5
City of Centerline (Urban County)	4.44%	4
City of Eastpointe (Urban County)	18.89%	17
City of Fraser (Urban County)	3.33%	3
City of Mount Clemens (Urban County)	8.89%	8
City of New Baltimore (Urban County)	1.11%	1
City of Richmond (Urban County)	0.00%	0
City of Utica (Urban County)	0.00%	0
City of Roseville (HOME Consortium)	4.44%	4
City of Sterling Heights (HOME Consortium)	6.67%	6
Clinton Township (HOME Consortium)	7.78%	7
Other (specify below)	17.78%	16
<b>TOTAL</b>		<b>90</b>

#	OTHER (PLEASE SPECIFY)	DATE
1	Warren, MI	8/21/2023 11:47 AM
2	St. Clair Shores	8/9/2023 3:32 PM
3	Warren	8/2/2023 8:30 PM
4	Warren	8/2/2023 2:39 PM
5	Saint Clair Shores	7/28/2023 12:14 PM
6	Warren	7/27/2023 7:19 PM
7	Brownstown, MI (Wayne County)	7/27/2023 4:19 PM

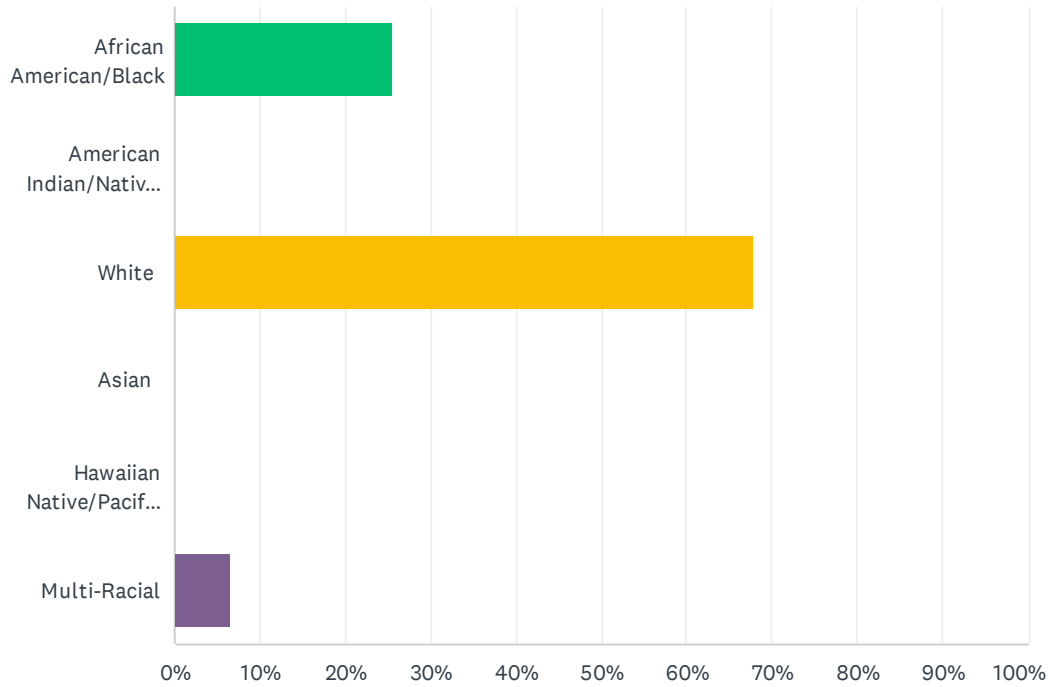
## Analysis of Impediments to Fair Housing Choice Survey

8	Warren	7/27/2023 2:02 PM
9	Work in the non-profit housing industry in Macomb	7/27/2023 11:41 AM
10	St. Clair Shores	7/27/2023 11:38 AM
11	City of Detroit	7/24/2023 11:54 AM
12	I work in Macomb County	7/24/2023 11:47 AM



## Q2 What is your race?

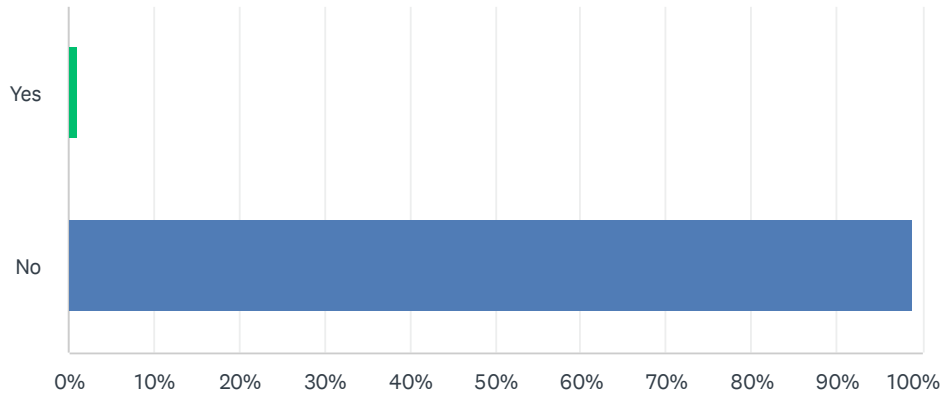
Answered: 90 Skipped: 0



ANSWER CHOICES	RESPONSES	
African American/Black	25.56%	23
American Indian/Native American	0.00%	0
White	67.78%	61
Asian	0.00%	0
Hawaiian Native/Pacific Islander	0.00%	0
Multi-Racial	6.67%	6
<b>TOTAL</b>		<b>90</b>

### Q3 Are you Hispanic or Latino?

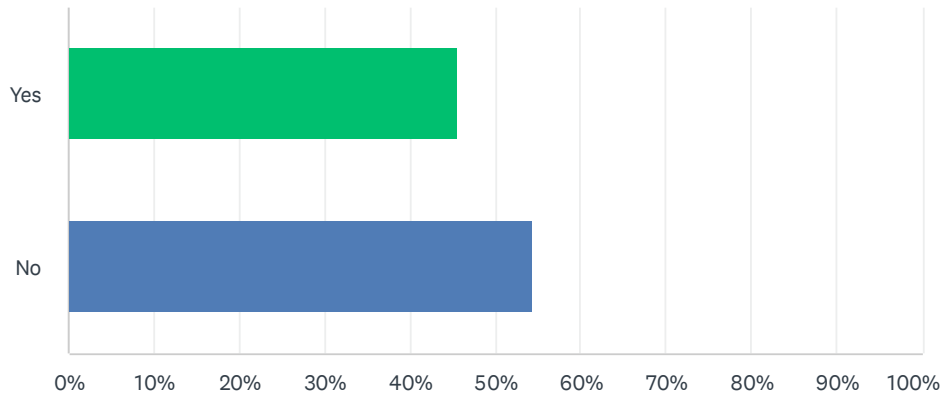
Answered: 90 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	1.11%	1
No	98.89%	89
TOTAL		90

Q4 Under the Fair Housing Act, it is illegal to discriminate against persons because of race, color, religion, sex (including gender identity and sexual orientation), disability, familial status, or national origin. Do you, or someone in your household, qualify under any of these protected classes?

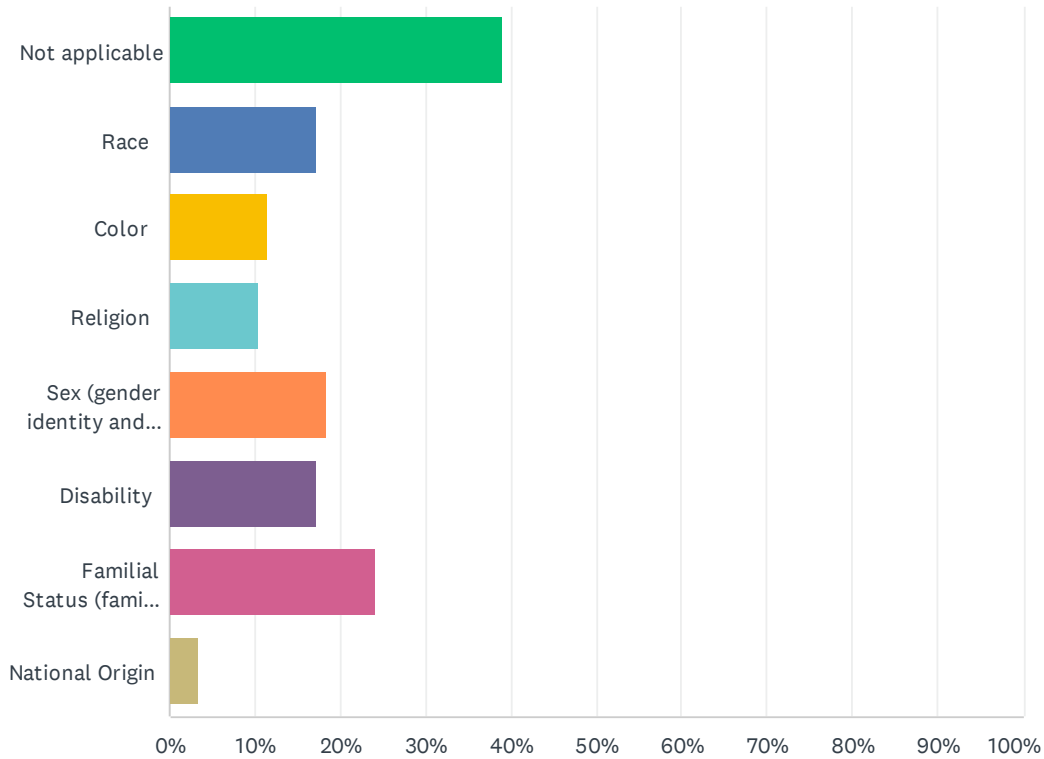
Answered: 90 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	45.56%	41
No	54.44%	49
TOTAL		90

### Q5 To which protected class do you/your household belong? (check all that apply)

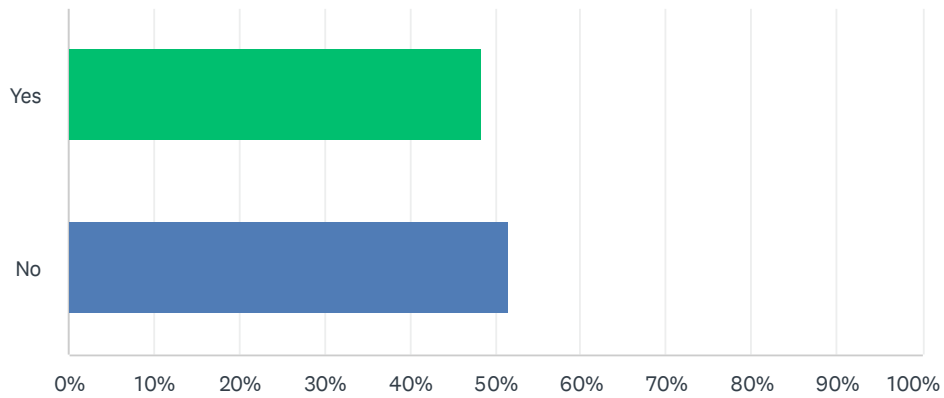
Answered: 87 Skipped: 3



ANSWER CHOICES	RESPONSES	
Not applicable	39.08%	34
Race	17.24%	15
Color	11.49%	10
Religion	10.34%	9
Sex (gender identity and sexual orientation)	18.39%	16
Disability	17.24%	15
Familial Status (family with one or more persons under 18 years of age)	24.14%	21
National Origin	3.45%	3
Total Respondents: 87		

## Q6 Do you have children under the age of 18 years?

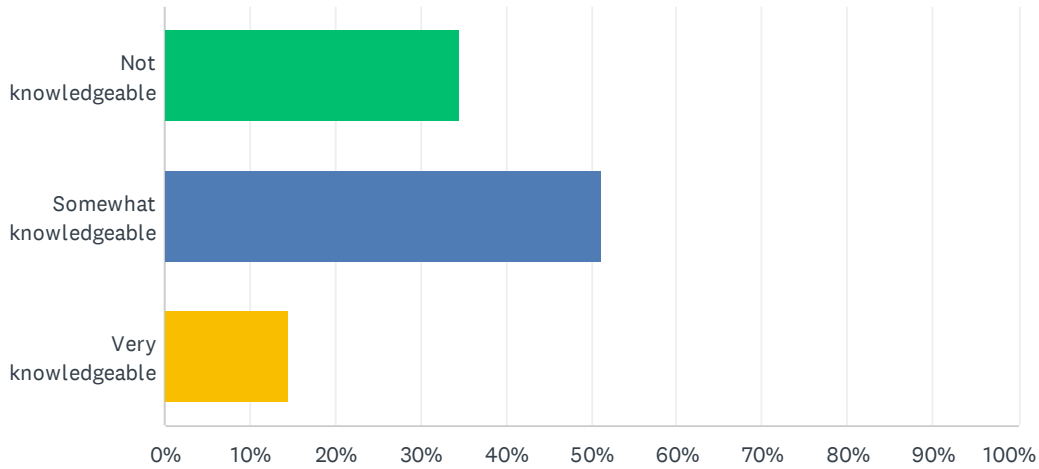
Answered: 89 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	48.31%	43
No	51.69%	46
TOTAL		89

## Q7 How much do you know about Fair Housing Laws, including State of Michigan Fair Housing Law?

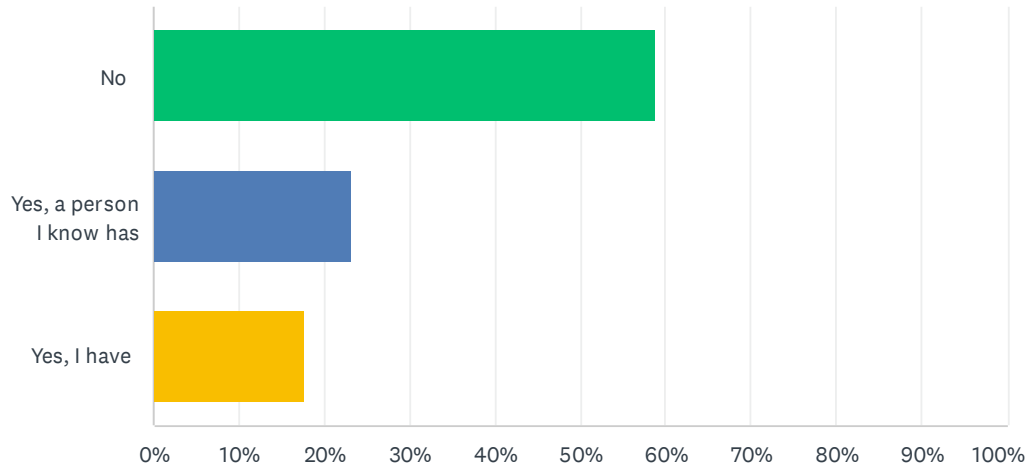
Answered: 90 Skipped: 0



ANSWER CHOICES	RESPONSES	
Not knowledgeable	34.44%	31
Somewhat knowledgeable	51.11%	46
Very knowledgeable	14.44%	13
<b>TOTAL</b>		<b>90</b>

## Q8 Have you, or any one you know, ever experienced housing discrimination?

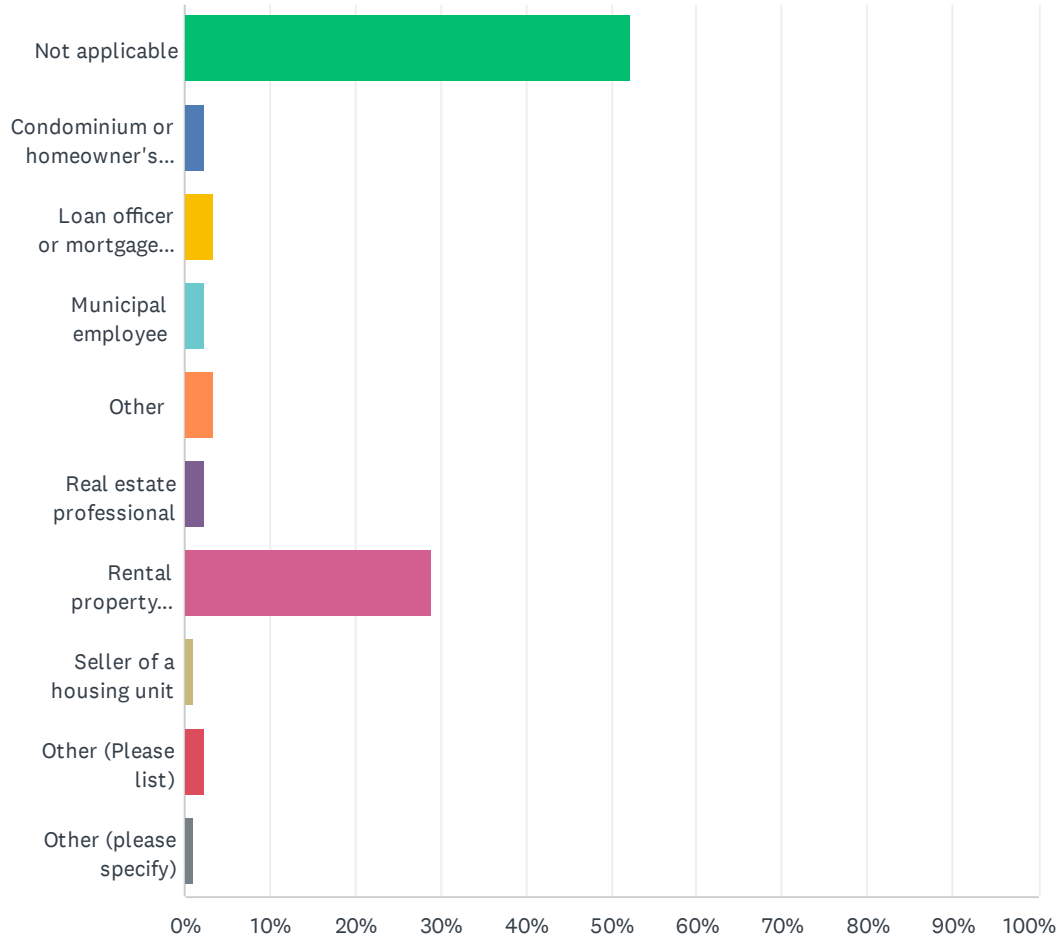
Answered: 90 Skipped: 0



ANSWER CHOICES	RESPONSES	
No	58.89%	53
Yes, a person I know has	23.33%	21
Yes, I have	17.78%	16
<b>TOTAL</b>		<b>90</b>

### Q9 Which of the following best describes the person or organization that discriminated against you or the person you know?

Answered: 86 Skipped: 4





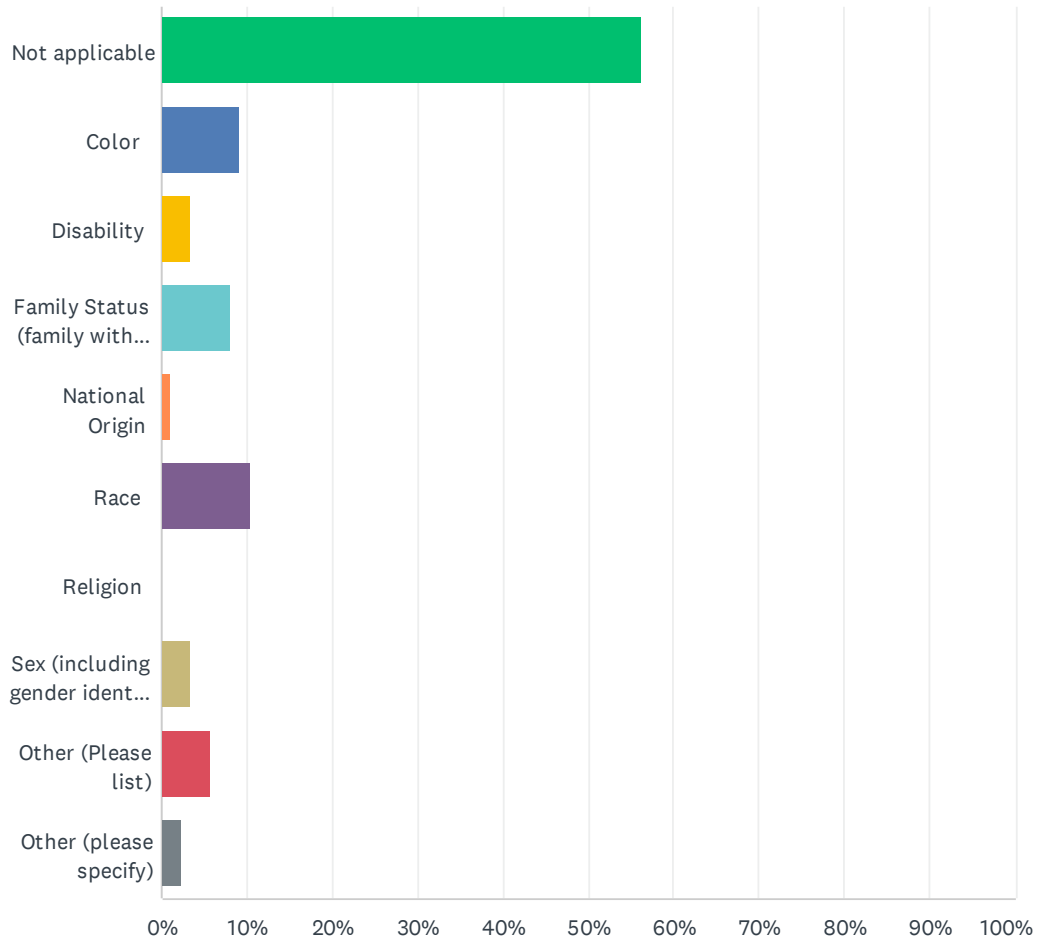
## Analysis of Impediments to Fair Housing Choice Survey

ANSWER CHOICES	RESPONSES	
Not applicable	52.33%	45
Condominium or homeowner's association	2.33%	2
Loan officer or mortgage broker	3.49%	3
Municipal employee	2.33%	2
Other	3.49%	3
Real estate professional	2.33%	2
Rental property manager/owner	29.07%	25
Seller of a housing unit	1.16%	1
Other (Please list)	2.33%	2
Other (please specify)	1.16%	1
<b>TOTAL</b>		<b>86</b>

#	OTHER (PLEASE SPECIFY)	DATE
1	Housing agency receiving get gov funding	7/27/2023 11:55 AM

# Q10 What do you believe was the basis for the discrimination you or the person you know experienced?

Answered: 87 Skipped: 3



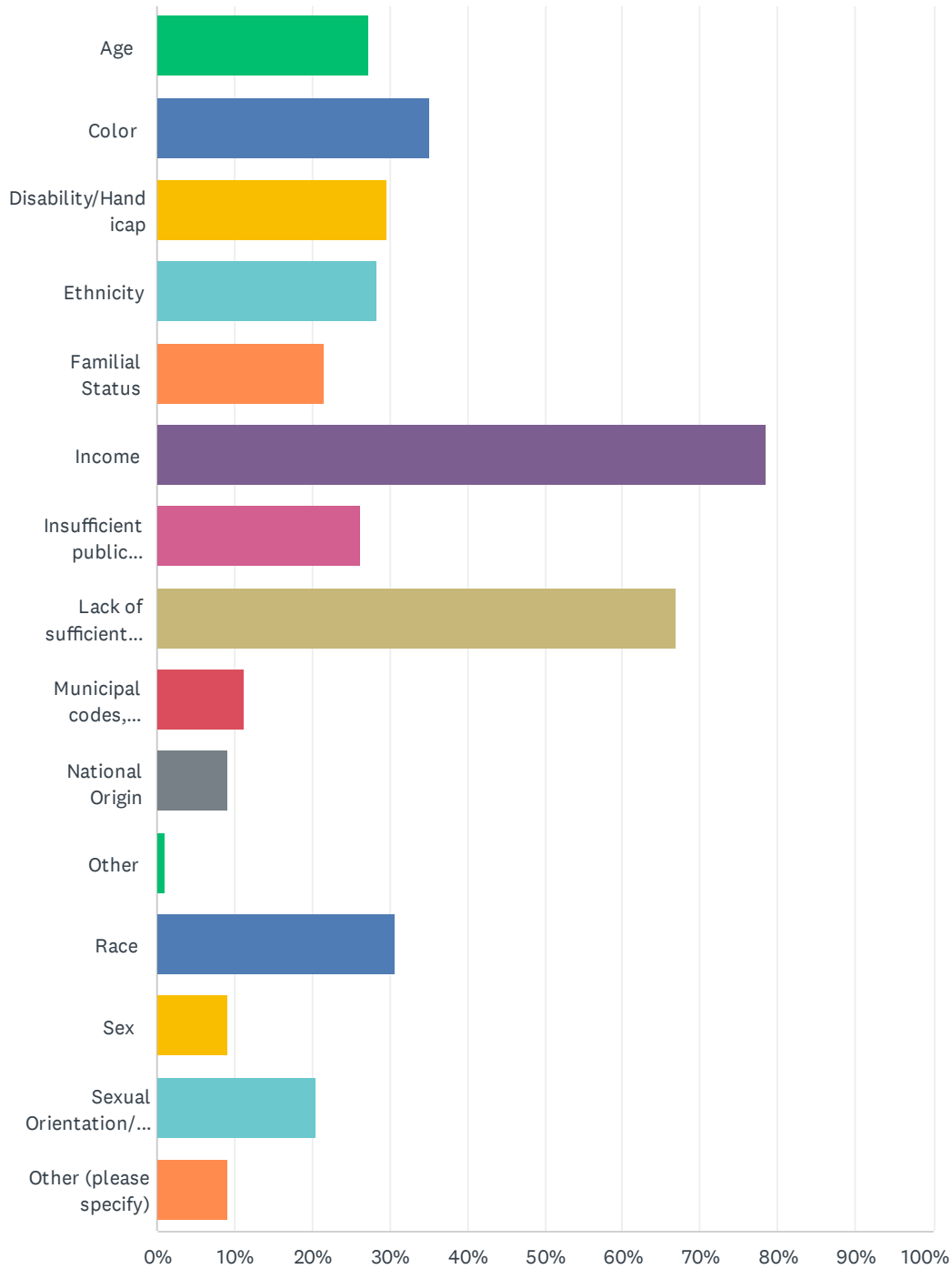
## Analysis of Impediments to Fair Housing Choice Survey

ANSWER CHOICES	RESPONSES	
Not applicable	56.32%	49
Color	9.20%	8
Disability	3.45%	3
Family Status (family with one or more persons under 18 years of age)	8.05%	7
National Origin	1.15%	1
Race	10.34%	9
Religion	0.00%	0
Sex (including gender identity or sexual orientation)	3.45%	3
Other (Please list)	5.75%	5
Other (please specify)	2.30%	2
<b>TOTAL</b>		<b>87</b>

#	OTHER (PLEASE SPECIFY)	DATE
1	Not enough income, to many people living in home	8/28/2023 6:21 PM
2	Financial	8/21/2023 11:47 AM

### Q11 What do you see as primary impediments to fair housing choices in Macomb County? (check all that apply).

Answered: 88 Skipped: 2



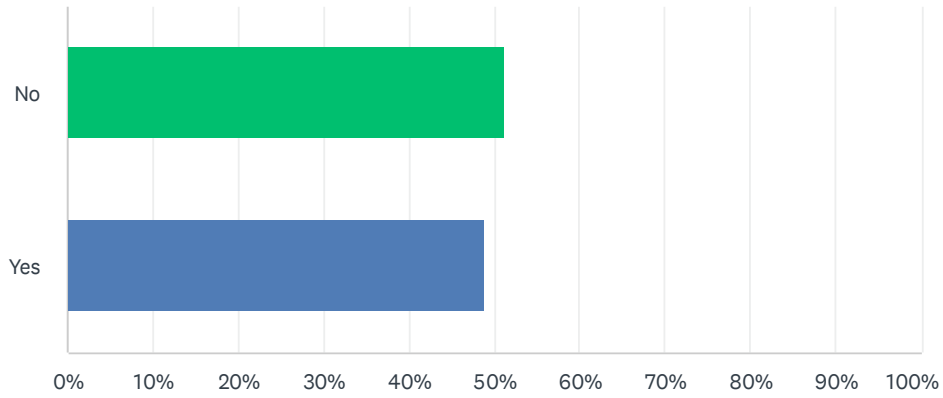
## Analysis of Impediments to Fair Housing Choice Survey

ANSWER CHOICES	RESPONSES	
Age	27.27%	24
Color	35.23%	31
Disability/Handicap	29.55%	26
Ethnicity	28.41%	25
Familial Status	21.59%	19
Income	78.41%	69
Insufficient public transportation	26.14%	23
Lack of sufficient affordable housing	67.05%	59
Municipal codes, ordinances, or regulations	11.36%	10
National Origin	9.09%	8
Other	1.14%	1
Race	30.68%	27
Sex	9.09%	8
Sexual Orientation/Gender Identity	20.45%	18
Other (please specify)	9.09%	8
<b>Total Respondents: 88</b>		

#	OTHER (PLEASE SPECIFY)	DATE
1	None	8/28/2023 7:50 PM
2	High property taxes	8/21/2023 4:21 PM
3	senior citizens	8/16/2023 5:44 PM
4	Property mgr wanted to illegally evict us to raise rent with MSHDA during covidp	8/14/2023 8:59 PM
5	Credit history	8/2/2023 5:14 PM
6	Z	8/2/2023 3:17 PM
7	Lack of education, knowledge that affordable housing is a major issue.	7/24/2023 1:51 PM
8	Lack of Education regarding fair housing.	7/24/2023 12:29 PM

## Q12 Do you feel your housing choices are geographically limited to certain areas or neighborhoods?

Answered: 90 Skipped: 0



ANSWER CHOICES	RESPONSES	
No	51.11%	46
Yes	48.89%	44
TOTAL		90

## Q13 If yes, please indicate areas or neighborhoods where housing choice is limited.

Answered: 48 Skipped: 42

#	RESPONSES	DATE
1	Neighborhoods that have houses costing \$300,000 or more	8/28/2023 6:43 PM
2	Not applicable	8/22/2023 6:49 PM
3	Lower income cities	8/21/2023 9:11 PM
4	All areas have limited affordable property	8/21/2023 4:32 PM
5	Macomb as a whole!	8/21/2023 11:47 AM
6	Warren	8/21/2023 11:18 AM
7	Macomb twp	8/19/2023 11:19 AM
8	Macomb twp	8/19/2023 10:11 AM
9	Everywhere but cities where there is a plethora of diversity	8/18/2023 4:55 PM
10	Mainly white middle, upper income community	8/18/2023 4:29 PM
11	Washington Township has VERY LITTLE affordable housing. Apartments are way over priced, especially for those on a fixed or limited income. There is a stigma in this area to being lower-income and NO low income housing is wanted here.	8/16/2023 5:44 PM
12	N/A	8/15/2023 1:53 PM
13	We as people all should have the same experience if living in a nice area not just to one area because of my color of my skin or I am not smart enough to work behind a desk. Things like that matter	8/15/2023 8:49 AM
14	You are ALWAYS given housing choices in the highest crime areas, least desirable cities and poor school districts.	8/14/2023 8:59 PM
15	N/A	8/14/2023 11:43 AM
16	All	8/3/2023 3:43 AM
17	Grosspointe Sterling Heights	8/2/2023 9:31 PM
18	It's cheaper the closer you get to 8 Mile Rd.	8/2/2023 8:30 PM
19	Decent areas that are affordable for single parents. Single parents don't want to be raising their children up in high crime areas, and the school district that can't provide proper education for them.	8/2/2023 7:38 PM
20	Southwest Warren Mi and centerline Mi	8/2/2023 6:45 PM
21	Chesterfield in New, Baltimore, Sterling, Heights, Utica	8/2/2023 5:14 PM
22	Macomb county, has a lot of properties for rent but not for low income families.	8/2/2023 3:51 PM
23	Grosse pointe	8/2/2023 3:40 PM
24	Detroit, East pointe, Warren, Roseville	8/2/2023 3:17 PM
25	Rural areas of Macomb county	8/2/2023 2:39 PM
26	Roseville, Warren, Sterling Heights	8/2/2023 2:32 PM
27	Macomb county as a whole	8/2/2023 2:25 PM

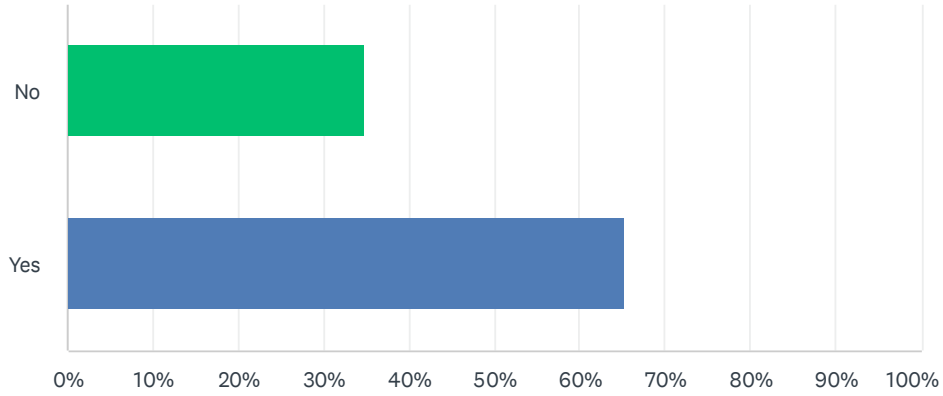


## Analysis of Impediments to Fair Housing Choice Survey

28	Detroit, Fraser, Roseville, Macomb, SouthField, Birmingham, Troy, Rochester,	8/2/2023 2:16 PM
29	Na	8/2/2023 2:06 PM
30	There aren't many affordable housing developments in the Macomb County area, unless you are senior. I also feel that with affordable housing the income limit to qualify is very low to the point where it isn't helping the main income class that actually needs affordable housing. Also, many of the individuals who seek affordable housing don't always have the best credit score and are turned down.	7/31/2023 8:38 AM
31	Most areas, but it feels like poverty ends up concentrated in Mount Clemens, Warren, Roseville, and Eastpointe areas.	7/28/2023 12:14 PM
32	warren	7/27/2023 7:19 PM
33	N/A	7/27/2023 4:19 PM
34	All over, there just is not enough affordable housing. The wait list are very long.	7/27/2023 12:38 PM
35	N:A	7/27/2023 12:06 PM
36	All throughout Macomb county	7/27/2023 11:55 AM
37	Mt Clemens and Roseville	7/27/2023 11:41 AM
38	Rural areas, northern Macomb County	7/25/2023 4:38 PM
39	Clinton township, mount clemens, east pointe	7/25/2023 8:47 AM
40	Most of Macomb County	7/25/2023 4:17 AM
41	I think people of color still have housing challenges when going into areas of predominately white people.	7/24/2023 4:02 PM
42	N/A	7/24/2023 2:52 PM
43	Moderate to upper income communities or neighborhoods that are exclusively zoned for single family housing, and commercial districts that don't allow any upper floor residential units/mixed-use development.	7/24/2023 1:46 PM
44	Sterling Heights, Shelby Twp,	7/24/2023 1:28 PM
45	Where I happen to live you can only find a single family house 3+ bedrooms. There are no rental properties or smaller starter homes.	7/24/2023 12:29 PM
46	The vast majority of land in Macomb County is zoned for single-family residences with large minimums for square footage and lot size. This increases the cost to purchase or rent housing, and limits choice for low-income residents to the inner-ring suburbs where smaller homes and multifamily apartments already exist. Low-density residential neighborhoods are also difficult to navigate using a wheelchair, which limits choice for people with mobility impairments.	7/24/2023 11:54 AM
47	Moderate to higher income communities	7/24/2023 11:47 AM
48	Sterling Heights, Ray Township, Utica, Armada etc.	7/24/2023 11:47 AM

### Q14 Do you perceive certain geographic areas or neighborhoods with Macomb County to be undesirable?

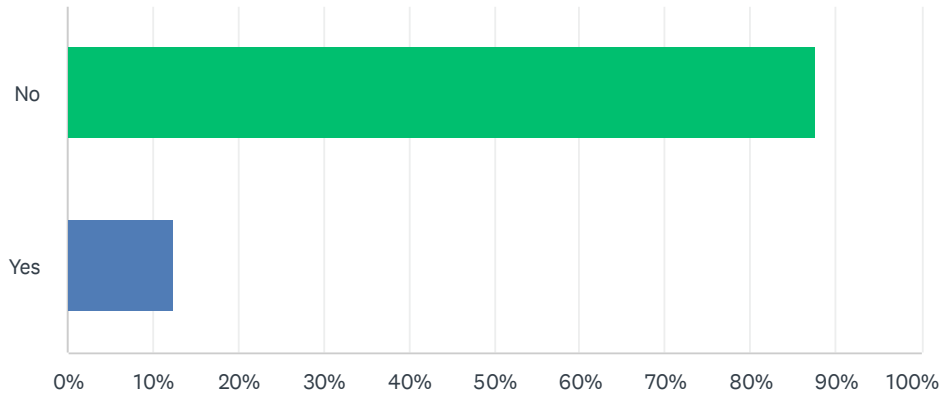
Answered: 89 Skipped: 1



ANSWER CHOICES	RESPONSES	
No	34.83%	31
Yes	65.17%	58
TOTAL		89

### Q15 Do you feel that there is an adequate supply of affordable housing that is available to all residents?

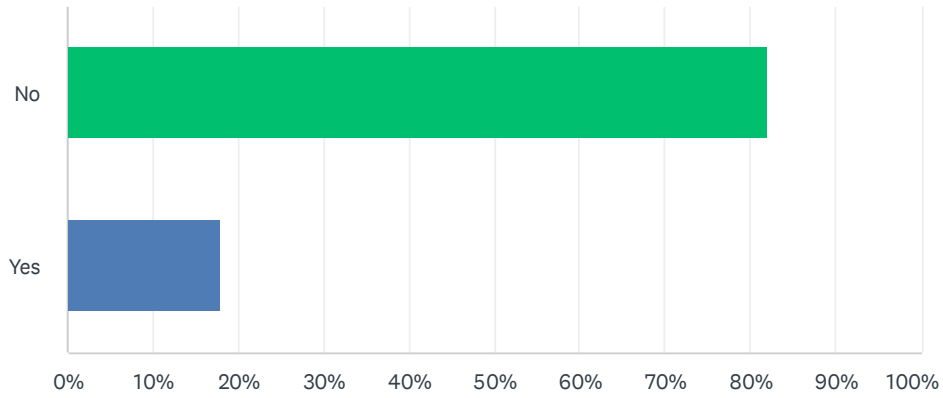
Answered: 89 Skipped: 1



ANSWER CHOICES	RESPONSES	
No	87.64%	78
Yes	12.36%	11
TOTAL		89

### Q16 Do you feel that there is an adequate supply of affordable housing that is available to disabled residents?

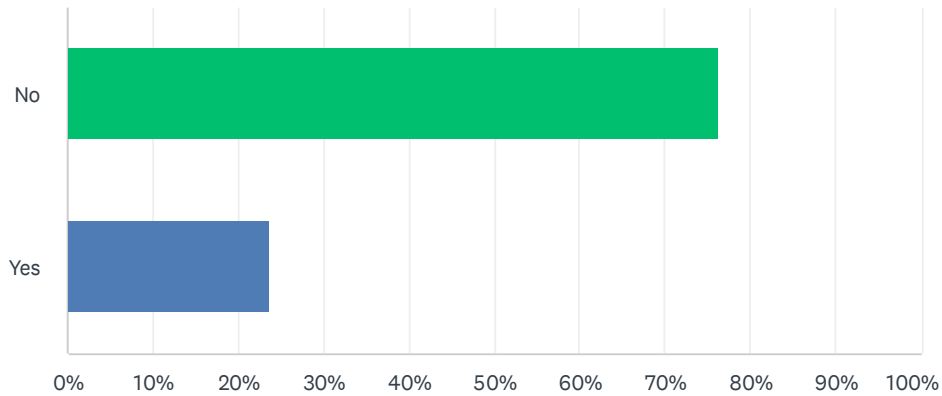
Answered: 89 Skipped: 1



ANSWER CHOICES	RESPONSES	
No	82.02%	73
Yes	17.98%	16
TOTAL		89

Q17 Do you feel that there is an adequate supply of affordable housing that is available to senior citizen residents? (For example, housing that permits aging in place, supportive senior communities, single-story housing, “granny-flats,” etc.).

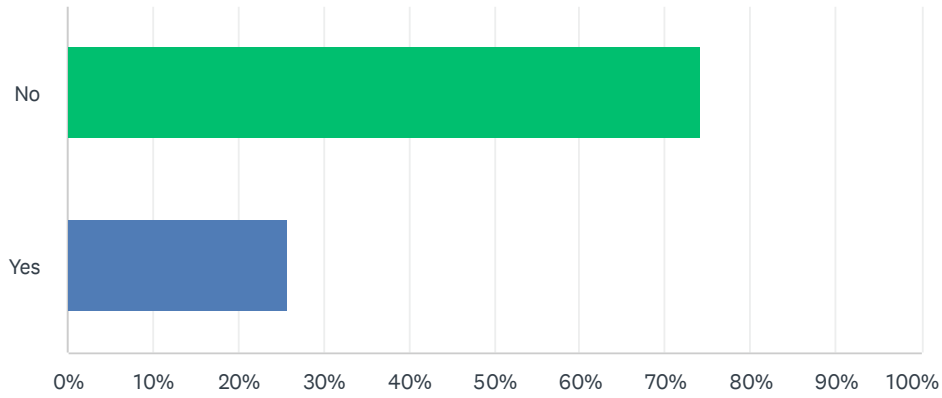
Answered: 89 Skipped: 1



ANSWER CHOICES	RESPONSES	
No	76.40%	68
Yes	23.60%	21
TOTAL		89

### Q18 Do you feel that there is an adequate supply of affordable housing that is available to residents with children?

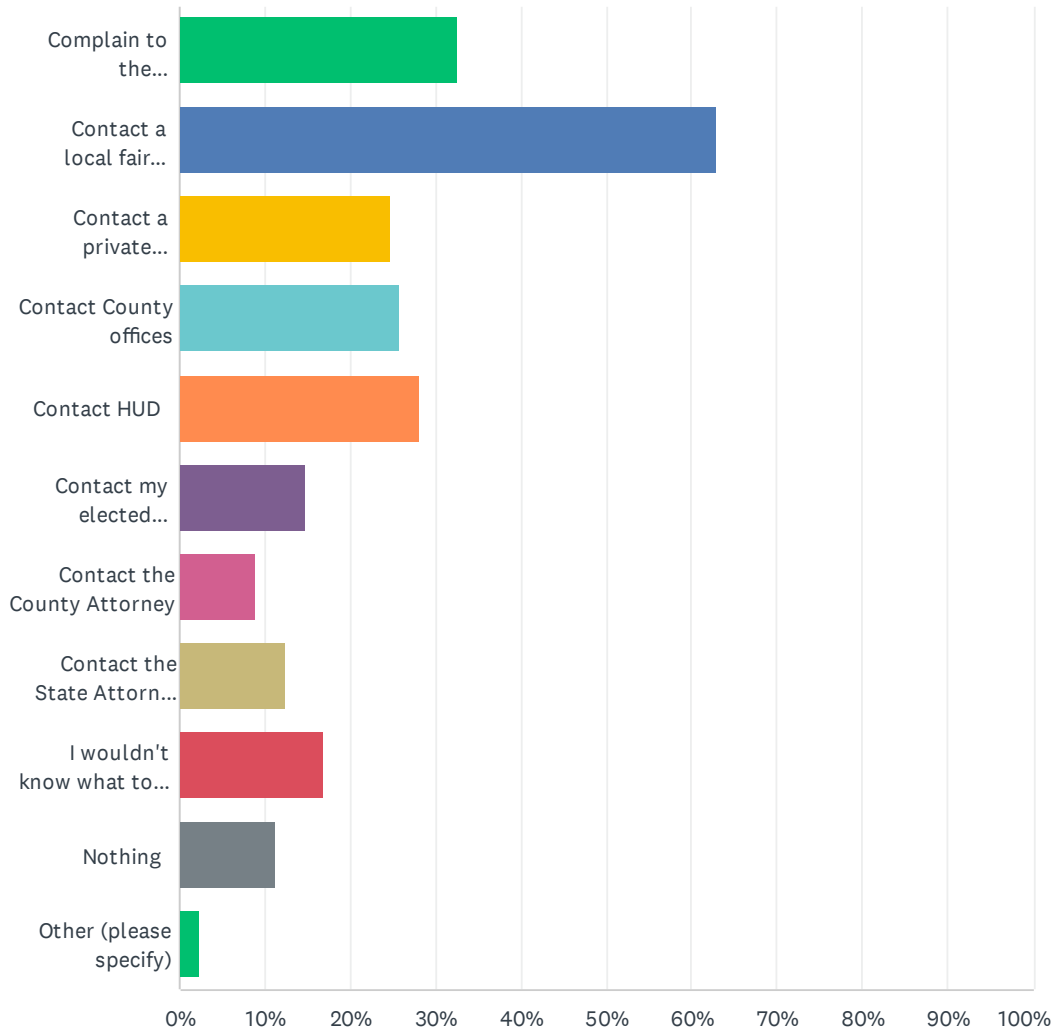
Answered: 89 Skipped: 1



ANSWER CHOICES	RESPONSES	
No	74.16%	66
Yes	25.84%	23
TOTAL		89

### Q19 What would you do, or did you do, if you were discriminated against in housing choice? (check all that apply)

Answered: 89 Skipped: 1





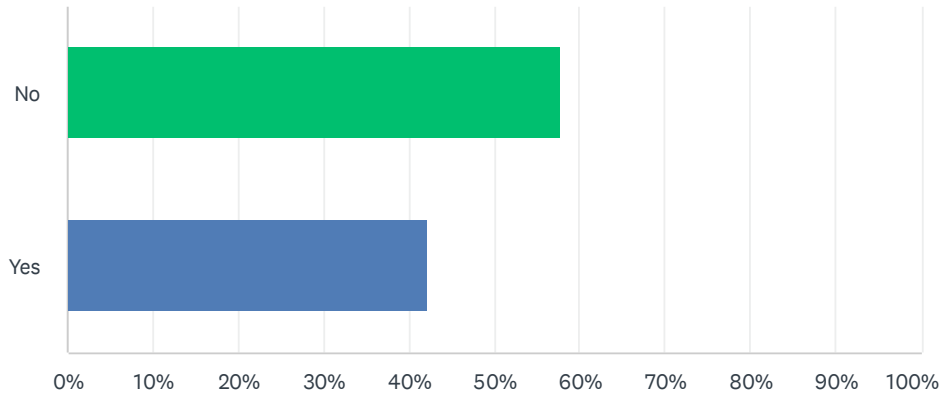
## Analysis of Impediments to Fair Housing Choice Survey

ANSWER CHOICES	RESPONSES	
Complain to the individual/organization that discriminated against me	32.58%	29
Contact a local fair housing organization	62.92%	56
Contact a private attorney	24.72%	22
Contact County offices	25.84%	23
Contact HUD	28.09%	25
Contact my elected municipal representative	14.61%	13
Contact the County Attorney	8.99%	8
Contact the State Attorney General	12.36%	11
I wouldn't know what to do	16.85%	15
Nothing	11.24%	10
Other (please specify)	2.25%	2
Total Respondents: 89		

#	OTHER (PLEASE SPECIFY)	DATE
1	Reported to MSHDA	8/14/2023 8:59 PM
2	The land lord submitted eviction to the 39th district court to judge hakim	8/7/2023 10:44 AM

## Q20 Are you familiar with the fair housing or social services provided by Macomb County?

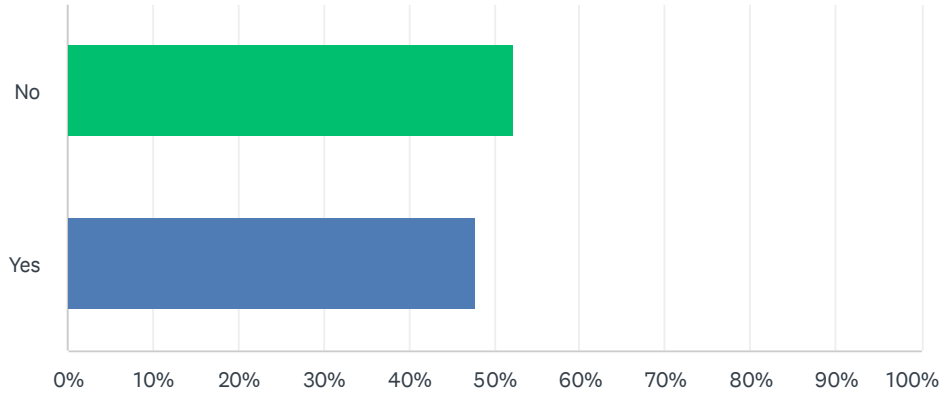
Answered: 90 Skipped: 0



ANSWER CHOICES	RESPONSES	
No	57.78%	52
Yes	42.22%	38
TOTAL		90

## Q21 Have you seen or heard information regarding the fair housing programs, laws, or enforcement?

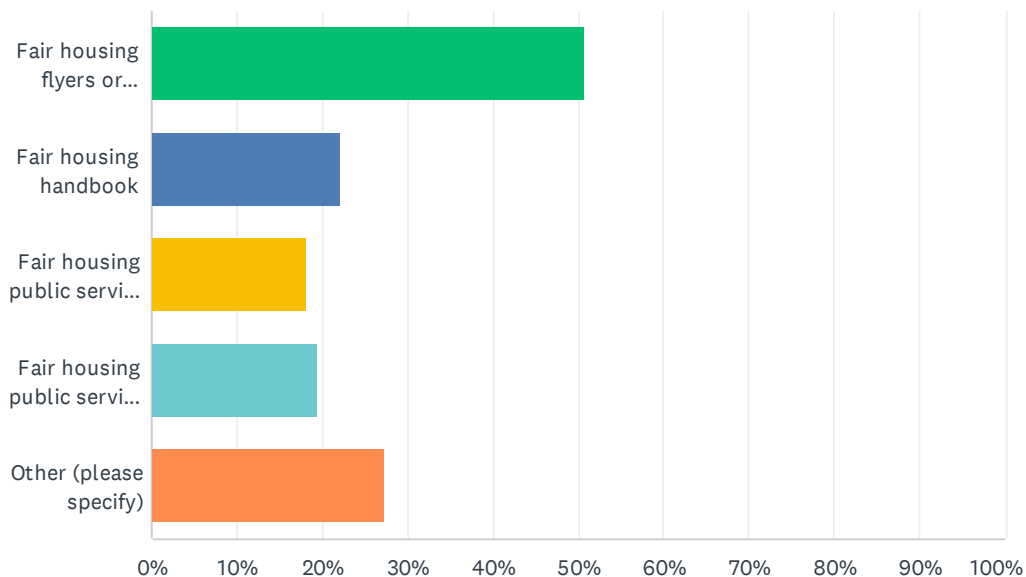
Answered: 90 Skipped: 0



ANSWER CHOICES	RESPONSES	
No	52.22%	47
Yes	47.78%	43
TOTAL		90

## Q22 What Fair Housing information have you seen/heard? (check all that apply)

Answered: 77 Skipped: 13



ANSWER CHOICES	RESPONSES
Fair housing flyers or pamphlets	50.65% 39
Fair housing handbook	22.08% 17
Fair housing public service announcement on the radio	18.18% 14
Fair housing public service announcement on the television	19.48% 15
Other (please specify)	27.27% 21
Total Respondents: 77	

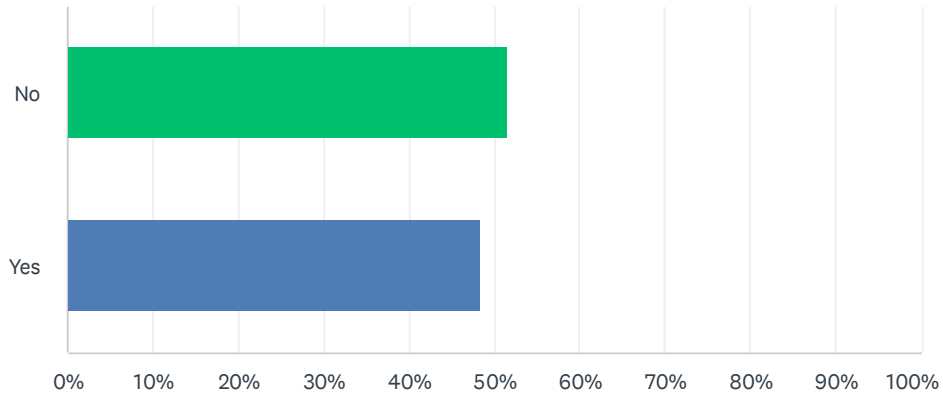
#	OTHER (PLEASE SPECIFY)	DATE
1	None	8/21/2023 9:11 PM
2	word of mouth	8/21/2023 7:02 PM
3	none	8/21/2023 4:32 PM
4	Fair Housing Seminars	8/16/2023 5:44 PM
5	None	8/15/2023 1:42 PM
6	They told little to nothing	8/15/2023 8:49 AM
7	None	8/14/2023 11:43 AM
8	Nothing	8/7/2023 10:44 AM
9	Nothing but word of mouth	8/2/2023 7:38 PM
10	None	8/2/2023 6:45 PM

## Analysis of Impediments to Fair Housing Choice Survey

11	Online	8/2/2023 5:14 PM
12	None	8/2/2023 3:51 PM
13	None	8/2/2023 3:40 PM
14	None	8/2/2023 3:17 PM
15	None	8/2/2023 3:10 PM
16	None	8/2/2023 2:25 PM
17	None	8/2/2023 2:16 PM
18	had someone from fair housing talk to our clients	7/27/2023 3:37 PM
19	None	7/26/2023 8:48 AM
20	N/A	7/24/2023 2:52 PM
21	Fair housing trainings in Continuing Ed for RE license	7/24/2023 1:43 PM

### Q23 Do you think that adequate fair housing information is available in other language translations?

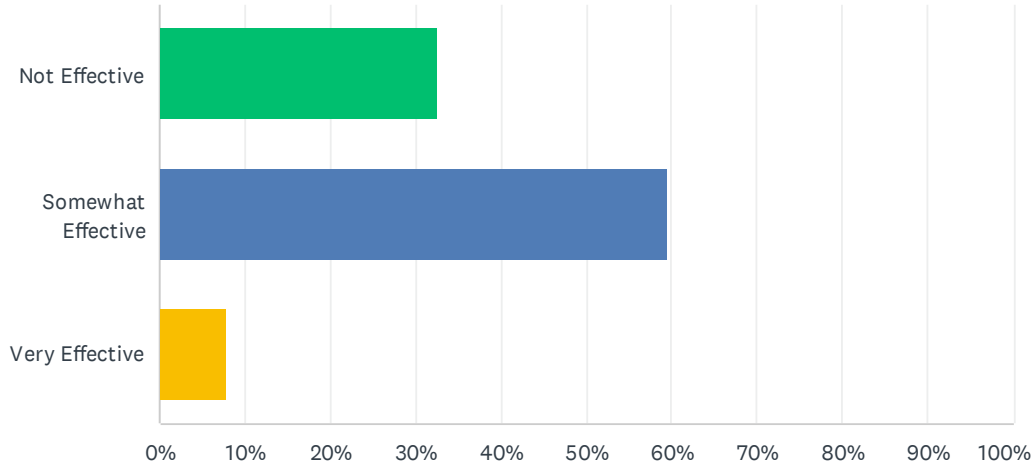
Answered: 89 Skipped: 1



ANSWER CHOICES	RESPONSES	
No	51.69%	46
Yes	48.31%	43
TOTAL		89

## Q24 In your opinion, how effective are the current fair housing laws, programs, and enforcement mechanisms?

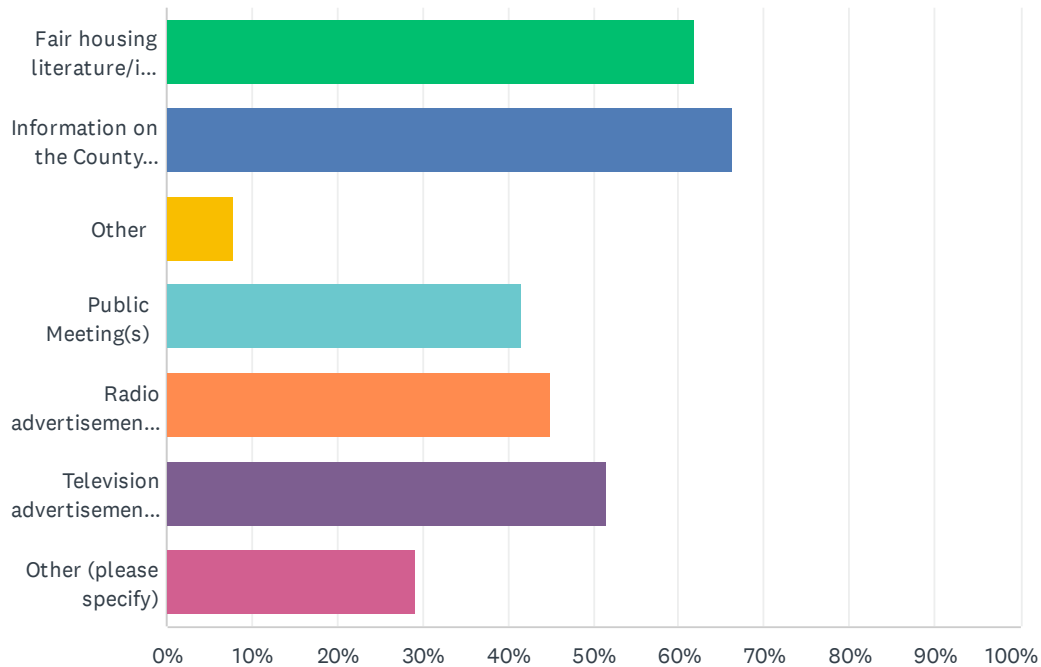
Answered: 89 Skipped: 1



ANSWER CHOICES	RESPONSES	
Not Effective	32.58%	29
Somewhat Effective	59.55%	53
Very Effective	7.87%	7
TOTAL		89

## Q25 What do you feel would be the most effective ways to inform the residents about their fair housing rights and/or responsibilities? (check all that apply)

Answered: 89 Skipped: 1



ANSWER CHOICES	RESPONSES
Fair housing literature/information in public libraries and County Offices	61.80% 55
Information on the County website	66.29% 59
Other	7.87% 7
Public Meeting(s)	41.57% 37
Radio advertisements/announcements	44.94% 40
Television advertisements/announcements	51.69% 46
Other (please specify)	29.21% 26
Total Respondents: 89	

#	OTHER (PLEASE SPECIFY)	DATE
1	Social media	8/28/2023 6:21 PM
2	social media platforms	8/18/2023 4:29 PM
3	The one's that live their life there go to the area and give the Information they will thank you.	8/15/2023 8:49 AM
4	Enforcement of the laws and provide an attorney to sue the landlord or mgt co!	8/14/2023 8:59 PM
5	Emails	8/3/2023 3:43 AM



## Analysis of Impediments to Fair Housing Choice Survey

6	Facebook	8/2/2023 8:30 PM
7	Flyers in the mail. Around the stores	8/2/2023 7:38 PM
8	World Wide Web/social media	8/2/2023 6:45 PM
9	Email	8/2/2023 3:40 PM
10	Mail information	8/2/2023 2:32 PM
11	Required to be provided with lease agreement	8/2/2023 2:16 PM
12	By mail	8/2/2023 2:06 PM
13	something in the mail or put on the residents door, like a pamphlet or flyer with a QR code for more information or a web link they can go to or a direct line to someone to retrieve more information	7/31/2023 8:38 AM
14	mailed directly to people's homes	7/29/2023 8:38 AM
15	use social media to promote: facebook, instagram, snapchat, twitter	7/28/2023 11:53 AM
16	Mail	7/28/2023 11:52 AM
17	information at dhs, or pantries	7/27/2023 7:19 PM
18	social media, faith-based agencies and places of worship	7/27/2023 2:02 PM
19	Train Macomb County staff	7/27/2023 11:41 AM
20	Social Media	7/25/2023 2:54 PM
21	Social media campaigns	7/24/2023 1:51 PM
22	Online via email, social media, ads, etc.	7/24/2023 1:46 PM
23	Social Media advertisements/announcements	7/24/2023 1:43 PM
24	Social Media	7/24/2023 1:28 PM
25	Social media	7/24/2023 12:49 PM
26	mailers	7/24/2023 11:47 AM