/// ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CITY OF LIVONIA
CITY OF WESTLAND
CHARTER TOWNSHIP OF REDFORD
2023

Livonia

CHARTER TOWNSHIP OF REDFORD
REDFORD TOWNSHIP
Est. March 1833

CITY OF WESTLAND
MICHIGAN

EQUAL HOUSING
OPPORTUNITY

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BACKGROUND

The Consolidated Plan regulations (24 CFR 91) require each state and local government receiving Community Development Block Grant (CDBG) funds to submit a certification that it 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.

An Analysis of Impediments to Fair Housing Choice (AI) is an examination of the impediments or barriers to fair housing that affect protected classes within a geographic region. Any discussion of impediments to fair housing focuses on discrimination and should not be confused with a full-scale discussion of housing affordability. The Federal Fair Housing Act bars discrimination in housing based on race, color, religion, sex, national origin, familial status (families with children), and disability. Michigan's Elliott-Larsen Civil Rights Act protects those categories and adds marital status and age as protected categories.

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 30 years. However, recent reports show that barriers to affirmatively further fair housing choice still exist.

HUD defines impediments to fair housing choice as any action, omission, or decision:

- Taken because of race, color, religion, sex, disability, familial status, or national origin that restricts housing choices or the availability of housing choice.
- That constitutes a violation, or potential violation, of the Fair Housing Act.

- That is counterproductive to fair housing choice, such as community resistance when minorities, persons with disabilities and/or low-income persons first move into white and/or moderate-income areas, or resistance to the siting of housing facilities for persons with disabilities; or
- That has the effect of restricting housing opportunities on the basis of race, color religion, sex, disability, familial status, or national origin.

Further, HUD interprets that to affirmatively further fair housing a jurisdiction should:
- Analyze and eliminate housing discrimination in the particular jurisdictions.
- Promote fair housing choice for all persons.
- Provide opportunities for inclusive patterns of housing occupancy.
- Promote housing that is physically accessible to, and usable by, all persons, particularly persons with disabilities; and
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.

Definitions

The following definitions have been adopted by the City of Livonia, Redford Township, and the City of Westland for purposes of this study.

Fair Housing: equal and free access to residential housing choices regardless of race, color, religion, sex, age, disability, familial status (the presence of children), national origin, marital status, creed, ancestry, or unfavorable military discharge. Residential housing is fundamental to meeting essential needs and pursuing personal, educational, employment or other goals.

Impediments to fair housing: 1) any actions, omissions, or decisions taken because of race, color, religion, sex, age, handicap (disability), familial status (the presence of children), national origin, marital status, creed, ancestry, or unfavorable military discharge, which restrict housing choice, or 2) any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, age, disability, familial status or national origin or marital status, creed, or ancestry.

A central tenet of this study is that affordable housing is linked to fair housing in much the same way that issues of race and class are linked. This analysis assesses barriers to affordability, as well as fair

housing issues. This assertion does not indicate that racial and ethnic discrimination have ended. Rather, it contends that they may be fading and that other forms of discrimination, not based solely on race and ethnicity, are increasing.

A second tenet concerns the dynamics of the neighborhood life cycle. Neighborhoods are established; they then grow, prosper, mature, and then may begin to decline as the physical environment changes (e.g., new, more exciting homes are built with new, and possibly better, services offered elsewhere). Mainstream buyers are most likely to choose those opportunities perceived as more desirable. As the older neighborhood loses its cachet and the "smart" money moves elsewhere, prices may decline, and the neighborhood begins an economic and, possibly a racial or ethnic, transition which results in a re-segregation of the community. This often results in minor changes in the lives of the lower-income or minority residents who moved for an improved quality of life. If this premise is true, it is necessary to address the root(s) of the problem which may have to do with market dynamics as much as racial and income prejudice. Fair housing would then involve the successful retention of middle-income and non-minority residents in neighborhoods at-risk of downward spiral, every bit as much as opening new housing opportunities for minority and lower-income persons.

The three CDBG entitlement communities of Livonia, Redford Township, and Westland recognize the complexity of fair housing issues and the increasing inter-dependence between each jurisdiction. Thus, the three communities agreed to jointly produce what is intended to be a more comprehensive, thorough, and effective assessment of fair housing within the study area than would otherwise be possible independent from one another.

PURPOSE & METHODOLOGY

The intent of this AI is to establish a single framework by which Livonia, Redford Township, and Westland can jointly approach, assess and affirmatively further fair housing. It seeks to identify any local housing concerns and impediments to the exercise of fair housing choice in the cities of Westland and Livonia, and the Township of Redford. This analysis attempts to identify any attitudes, barriers, institutional practices, and public policies that create barriers to affirmatively further fair housing. Research and analysis of information regarding housing choice and restrictions was based upon review of socioeconomic and housing characteristics.

This analysis will evaluate a broad range of quantitative and qualitative data, document identified impediments to fair housing choice and to suggest actions that can be considered in working toward overcoming or mitigating the identified impediments. The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, which affect people who are protected under fair housing law. Many sources of information were used to compile this document, including U.S. Census and American Community Survey data, the jurisdictions' Consolidated Plans, Comprehensive Annual Performance and Evaluation Reports (CAPERs), previous AI's, comprehensive planning documents, and a wealth of other information from government and private institutions, and from citizens.

This AI is an update to the 2017 Analysis of Impediments to Fair Housing Choice completed for the Cities of Westland and Livonia, and the Charter Township of Redford, Michigan. Along with updated data and analysis, this AI also includes public input and review process via direct contact with stakeholders, public forums to collect input from citizens, distribution of draft reports for citizen review and formal presentation of findings.

Context

Joint Community Profile

DEMOGRAPHICS

General Characteristics

Each of the three communities are unique but share similarities. All are geographically proximate, located in Wayne County due west of the City of Detroit, and all are adjacent to one another. See **Map 1** for the geographic location of each of the communities. Redford Township has an irregular configuration, since much of its original territory was annexed by the City of Detroit during its period of explosive growth in the 1920's. It shares boundaries with the cities of Detroit to the east, Southfield to the north, Livonia to the west, and Dearborn Heights to the south. Livonia is a large suburb of 36 square miles and is bound by Redford Township to the east, the City of Farmington Hills to the north, affluent Plymouth and Northville Townships to the west, and Westland to the south. Westland is immediately south of Livonia and like Redford Township has an irregular configuration, sharing multiple borders with the cities Garden City, Inkster, Wayne, Dearborn Heights, and Romulus. To Westland's west is the Township of Canton.

All three communities are mature, having been largely developed between the 1940's and the 1970's. As they continue to mature, they are becoming more racially and ethnically diverse. Over the past 50 years all of the municipalities have benefited from the out-migration by families from the City of Detroit and, to a lesser extent, from other suburbs. Historically, these families were young and upwardly mobile, white, and seeking a better way of life. They found a variety of housing values and styles, from modestly constructed frame structures to more substantial and larger brick homes. Over the last couple of decades, minority representation has grown in each community. These communities are now home to an array of ethnoburbs, small neighborhood enclaves that support and attract minority populations, cultures, and businesses.

Along with Wayne County and the majority of Metropolitan Detroit, all three communities have been impacted by the economic restructuring of the regional economy. However, over the last decade,

Redford Township and the City of Westland have both experienced population growth over the last decade. The City of Livonia lost the greatest percentage of its population, losing 1.5% since 2010. Wayne County as a whole lost a similar percentage of its population as Livonia. Over the same time period, Metro Detroit saw a population growth of 2.7%, a larger growth than either Redford Township or the City of Westland.

Population

Table 1 reveals that the population of metropolitan Detroit (defined for this analysis as the seven county SEMCOG region), Wayne County, and two of the three focus communities have all increased in population between 2010 and 2020. SEMCOG estimates that the population of Livonia, Redford Township, Westland, and Wayne County will continue to decline over the next 25 years. As a whole, the population of the focus area is stagnant with little growth expected in the near future.

TABLE 1: TOTAL POPULATION OF AI STUDY AREA

Municipality	2010	2020	% Growth 2010 – 2020	2045 Estimate	Projected Growth 2020-2040
Livonia	96,942	95,535	-1.5%	94,228	-1.4%
Redford Township	48,362	49,504	2.4%	45,277	-8.5%
Westland	84,094	85,420	1.6%	85,427	0.0%
Wayne County	1,820,650	1,793,561	-1.5%	1,844,061	2.8%
Metro Detroit	4,704,809	4,830,489	2.7%	5,104,922	5.7%

Source: U.S. Census 2020; SEMCOG Community Profile Data – February 2022
TABLE 1 – Total Population of AI Study Area

Although each community is unlikely to see significant gains in its total population over the next 20 years, each community will continue to see a re-alignment of its population. **Table 2** shows that each community's elderly, over 65, population will generally increase, while its youth population, under 18, will decline.

Map 1 – AI Study Area
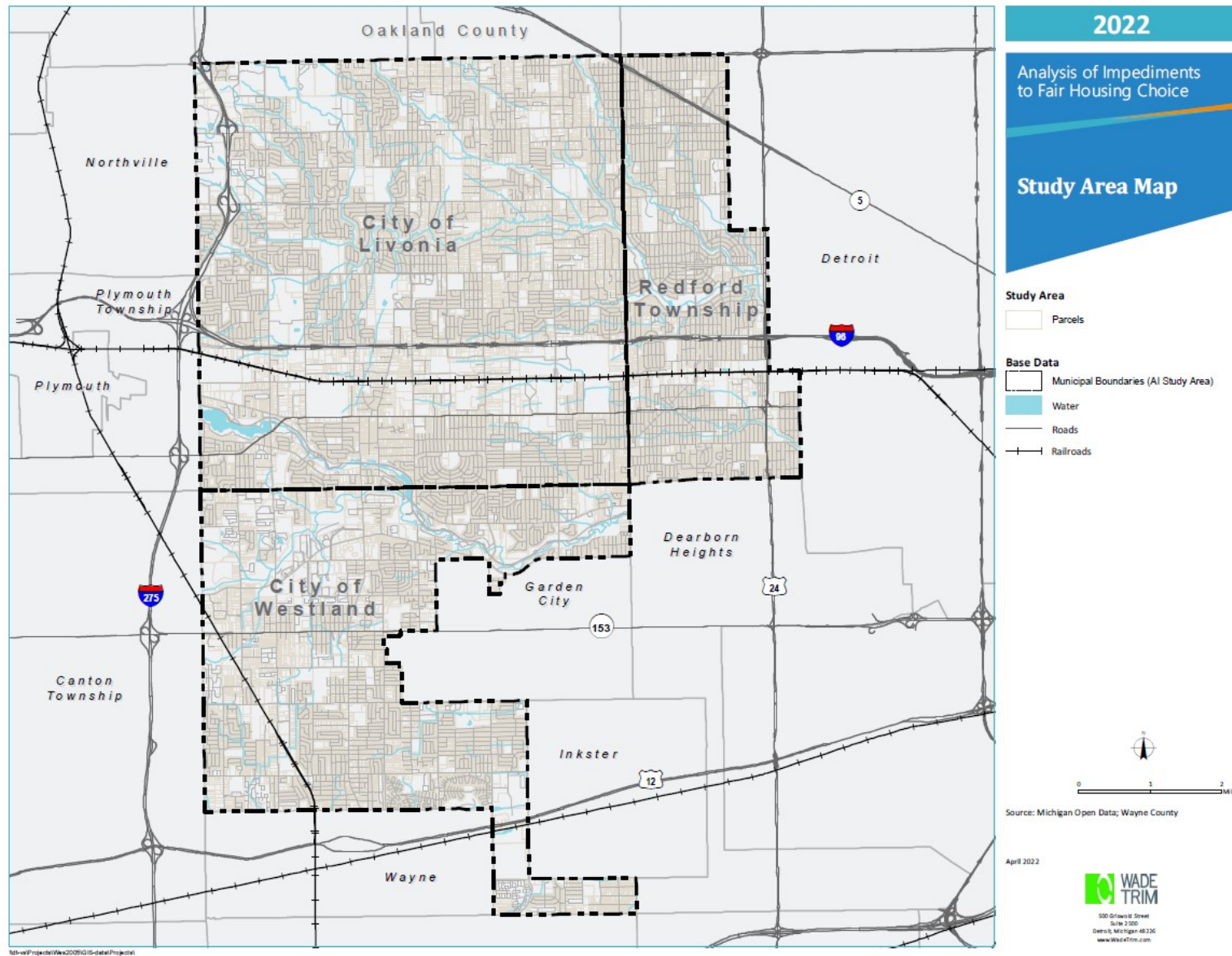
This aging of the population, especially in inner-ring and mature communities, is not unique. However, the challenge of providing the required services to meet the needs of this changing population must be strategically addressed in each community. An additional challenge to this population shift is the significant loss of residents between the ages of 18-64 who are the key occupants of both owner- and renter-occupied households. SEMCOG estimates that combined the three communities will lose more than 7,500 people of this key population cohort.

The **Populations Under Age 18 Map** demonstrates that many households dispersed throughout the study area include young people; however, there are several block groups in southern Westland, and several throughout Redford that have a concentration of young people greater than 30%. Most block groups throughout the study area have about 10% to 30% of its population that are young residents under 18 years of age.

The location of elderly members in the study area does not follow a strong trend. Block groups in most parts of the study area concentrations of elderly persons at a percentage of 10% or higher. Livonia has a number of block groups that has concentration of elderly persons at a rate of 20% or greater. This can be seen graphically in the **Populations Over Age 65 Map**. Within the study area, there are three block groups that have an elderly population concentration of 40% or greater. These groups are in Westland and Livonia.

TABLE 2: POPULATION BY AGE GROUP

	2016-2020 ACS		2045 Estimate		Change 2020 - 2045
Livonia	**#**	**%**	**#**	**%**	**#**
65 and over	18,740	19.9%	21,058	22.3%	2,318
25-64	50,839	54.0%	48,806	51.8%	-2,033
18-24	7,173	7.6%	7,249	7.7%	76
5-17	12,794	13.5%	12,524	13.3%	-270
Under 5	4,703	5.0%	4,591	4.9%	-112
Redford	**#**	**%**	**#**	**%**	**#**
65 and over	6,030	12.8%	9,693	21.4%	3,663
25-64	26,818	8.2%	23,214	51.3%	-3,604
18-24	3,869	56.9%	3,539	7.8%	-330
5-17	7,268	15.4%	6,323	14.0%	-945
Under 5	3,093	6.6%	2,508	5.5%	-585
Westland	**#**	**%**	**#**	**%**	**#**
65 and over	13,547	16.5%	19,631	23.0%	6,084
25-64	44,963	54.9%	43,291	50.7%	-1,672
18-24	6,527	8.0%	6,533	7.6%	6
5-17	11,407	13.9%	11,390	13.3%	-17
Under 5	5,494	6.7%	4,582	5.4%	-912

Source: 2016-2020 American Community Survey; SEMCOG Community Profiles – February 2022

TABLE 2: Population by Age Group

As noted, Redford and Westland experienced an increase in its population between 2010 and 2020. Over the same 10-year period, Livonia saw a slight decrease in population. **Table 3** shows the change in population by natural increase (more births than deaths) and migration since 2000. While the data displayed in this table is the most up to date available, it is not reflective of the most recent population trends identified in the 2016-2020 ACS. Generally, **Table 3** identifies that significant changes in population are due to migration, not the result of natural increase, and suggests that over the last 20 years the southeast Michigan region has seen a slight increase in population, while the AI communities have seen slight decreases. Evidently, migration plays an important role in the growth or decline of populations, and each of these communities has seen a decrease in the residential vacancy rate since 2010. It will be an ongoing challenge for these communities to address this realignment of population and housing and continue to offer housing choices that meet resident demand.

TABLE 3: POPULATION CHANGE

	2000-2005 Average	2011-2018 Average
Livonia		
Natural Increase	9	-153
Net Migration	-1,321	-207
Pop. Change	-1,312	-360
Redford		
Natural Increase	198	48
Net Migration	-934	-175
Pop. Change	-736	-127
Westland		
Natural Increase	402	113
Net Migration	-1,451	-128
Pop. Change	-1,049	-15
Outer-Wayne County		
Natural Increase	5,451	2,488
Net Migration	-11,496	-2,386
Pop. Change	-6,045	102

Source: Michigan Department of Community Health Vital Statistics, U.S. Census Bureau and the SEMCOG Community Profile Data, April 2022

TABLE 3: Population Change

INCOME AND EMPLOYMENT CHARACTERISTICS

Income

A decent income is necessary to provide life's essentials, including decent, safe, and sanitary housing. Adequate income is also essential to gaining access (by virtue of community, neighborhood, or voluntary association) to other facilities and services which provide a high standard of living. Examples would include proximity to, or having easy access to, employment centers; excellent public schools, which not only educate, but also help individuals make friends through clubs and informal associations; high quality and well-maintained parks and recreational facilities; and excellent libraries and cultural venues. These features create communities that individuals want to live, and remain in.

Higher-income households demand, and receive, these amenities as a matter of course; choosing to live in those communities that can provide them. From a municipal perspective, a strong tax base is indispensable in order to provide desired services and amenities, and in order to attract additional development and residents.

According to the U.S. Census Bureau's 2016-2020 American Community Survey (ACS) data, all three communities have a higher median household, median family, and median non-family income than Wayne County. However, it is likely that a key determinant of this statistic is the inclusion of the City of Detroit in the Wayne County estimate. **Table 4** shows that although the AI Study Area has a higher median income for households, families, and non-families than Wayne County, only the City of Livonia has the highest median income for households and families, when compared to the other municipalities in this analysis.

TABLE 4: INCOME COMPARISONS

Municipality	Median Household Income	Median Family Income	Median Non-Family Income
Livonia	$82,158	$98,634	$48,102
Redford	$60,249	$72,119	$39,168
Westland	$51,956	$68,125	$34,811
Wayne County	$49,359	$63,896	$31,449

Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

TABLE 4: Income Comparisons

Employment

Due to the restructuring of the domestic auto industry, the southeast Michigan region was in a near decade-long recession, losing employment every year since 2001. Staggering job loss, declining personal income, home foreclosure, an eroding tax base, and reductions in government services are challenges this region faces every day. From year 2000 to 2009, Southeast Michigan lost almost 500,000 jobs, or 20% of its total employment opportunities. A rapidly transforming new economy has left many less skilled and educated workers behind. Unemployment – already among the highest in the nation at eight percent in 2008 – skyrocketed to more than 15% in 2009. The study area is not immune to these larger regional, state, and national economic challenges.

However, the region has begun to recover from this economic downturn. Since 2015, the region as a whole gained 91,547 jobs. Redford Township and Westland lost employment, while Livonia gained employment opportunities. **Table 5** shows that forecasted through 2045, all three communities are expected to decrease in employment opportunities in the next couple of decades; however, the region as a whole is expected to see an increase in employment opportunities. These new jobs are very likely to be focused away from higher-paying manufacturing jobs and towards service and health care related industries.

TABLE 5: EMPLOYMENT PROJECTIONS

Municipality	2020	2025 Forecast	2045 Forecast	% Change 2020-2045
Livonia	89,498	87,714	88,876	-0.7%
Redford	19,125	18,443	17,734	-7.3%
Westland	26,630	25,696	26,268	-1.4%
Wayne County	940,409	932,389	949,345	1.0%
Metropolitan Detroit	2,865,770	2,862,711	2,959,998	3.3%

Source: SEMCOG Community Profile Data, March 2022

TABLE 5: Employment Projections

Tables 6-8 display the forecasted jobs expected in each of the three communities. Not surprisingly manufacturing is the largest industry that expects to see job losses in the coming years. This decline is directly related to the regional economic realignment away from auto-related employment opportunities. As the study area's population ages, demand for health services will grow and it is expected that many jobs in health care will become available in both the three communities and throughout the region. Although this increase in employment opportunities is encouraging many of these newly created jobs will require advanced education and training. This change in employment opportunities, from a manufacturing-based economy to a service and health care focused economy, needs to be recognized by the three communities as a potential challenge to meet the service and education needs of the community.

TABLE 6: CITY OF LIVONIA - CURRENT AND FORECASTED JOBS BY INDUSTRY

Jobs by Industry	2020	2045	Change
Natural Resources, Mining, & Construction	5,326	5,274	-52
Manufacturing	9,493	6,180	-3,313
Wholesale Trade, Transportation, Warehousing, & Utilities	6,474	7,098	624
Retail Trade	9,314	9,627	313
Knowledge-based Services	19,431	20,555	1,124
Services to Households & Firms	5,820	6,620	800
Private Education & Healthcare	15,586	18,406	2,820
Leisure & Hospitality	7,780	8,548	768
Public Administration & Other Services	6,775	6,568	-207
Total	**85,999**	**88,876**	**2,877**

Source: SEMCOG Community Profile Data, March 2022

TABLE 6: City of Livonia - Current and Forecasted Jobs by Industry

TABLE 7: REDFORD TOWNSHIP - CURRENT AND FORECASTED JOBS BY INDUSTRY

Jobs by Industry	2020	2045	Change
Natural Resources, Mining, & Construction	1,358	1,337	-21
Manufacturing	3,597	2,150	-1,447
Wholesale Trade, Transportation, Warehousing, & Utilities	1,624	1,528	-96
Retail Trade	1,927	1,347	-580
Knowledge-based Services	2,440	2,528	88
Services to Households & Firms	1,456	1,603	147
Private Education & Healthcare	2,842	3,300	458
Leisure & Hospitality	1,891	2,002	111
Public Administration & Other Services	1,990	1,939	-51
Total	**19,125**	**17,734**	**-1,391**

Source: SEMCOG Community Profile Data, March 2022

TABLE 7: Redford Township - Current and Forecasted Jobs by Industry

TABLE 8: CITY OF WESTLAND - CURRENT AND FORECASTED JOBS BY INDUSTRY

Jobs by Industry	2020	2045	Change
Natural Resources, Mining, & Construction	1,436	1,392	-44
Manufacturing	1,405	1,019	-386
Wholesale Trade, Transportation, Warehousing, & Utilities	2,087	1,886	-201
Retail Trade	5,006	3,282	-1,724
Knowledge-based Services	3,275	3,240	-35
Services to Households & Firms	1,956	2,212	256
Private Education & Healthcare	5,263	6,253	990
Leisure & Hospitality	3,820	4,081	261
Public Administration & Other Services	2,959	2,903	-56
Total	**27,207**	**26,268**	**-939**

Source: SEMCOG Community Profile Data, March 2022

TABLE 8: City of Westland - Current and Forecasted Jobs by Industry

The unemployment rate for Metropolitan Detroit has consistently been higher than the national average since 2001. However, the gap between national and local unemployment rates has begun to shrink. **Table 9** provides a comparison of the average unemployment rates in metropolitan Detroit and the nation from 2011-2021.

TABLE 9: UNEMPLOYMENT RATES, 2011-2022

Date	Detroit-Livonia-Dearborn PMSA	United States
Jan. 2011	13.1%	9.1%
Jan. 2012	11.9%	8.3%
Jan. 2013	12.3%	8.0%
Jan. 2014	10.7%	6.6%
Jan. 2015	8.0%	5.7%
Jan. 2016	6.1%	4.8%
Jan. 2017	6.5%	4.7%
Jan. 2018	5.8%	4.0%
Jan. 2019	5.8%	4.0%
Jan. 2020	5.3%	3.5%
Jan. 2021	6.7%	6.4%
Jan. 2022	Not Available	4.0%

Source: Bureau of Labor Statistics (BLS), March 2, 2022

TABLE 9: Unemployment Rates, 2011 - 2022

Figure 1 displays the ten-year unemployment rate for the Detroit-Livonia-Dearborn, MI PMSA. This graph clearly displays a substantial peak in the regional unemployment rate beginning in January 2020 and through January 2021, which is directly related to the COVID-19 pandemic. It is important to note that this peak is still lower than the unemployment rates identified in 2011, which are the result of the great recession and housing crisis that began in 2008. The region's high dependency on the domestic automotive industry, which required in-person work contributed to the employment decline when the pandemic required individuals to stay at home for safety.

FIGURE 1: UNEMPLOYMENT RATE: WAYNE COUNTY

Figure 1: Unemployment Rate: Wayne County
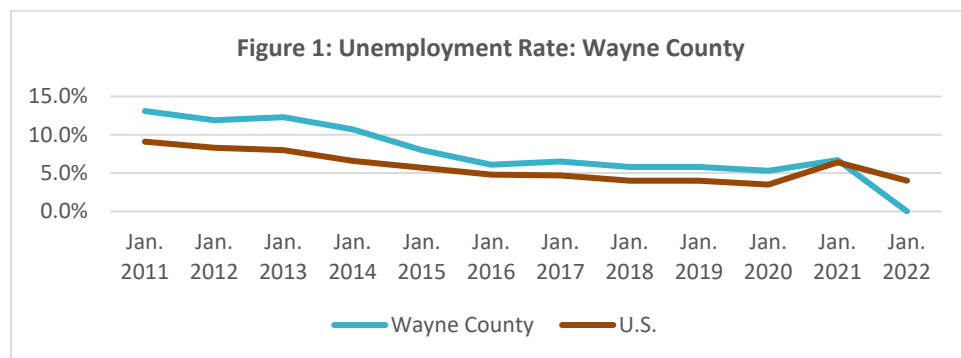
Source: Bureau of Labor Statistics (BLS), March 2, 2022

Since the height of the pandemic, the unemployment rates have declined nationally and regionally. **Table 10** shows that unemployment in each of the three communities also saw significant decline in unemployment rates between 2010 and 2020.

TABLE 10: PERCENT PERSONS (16 YEARS & OVER) WHO ARE UNEMPLOYED

Municipality	Census 2010	ACS 2016-2020
Livonia	5.4%	2.9%
Redford	8.4%	4.1%
Westland	7.7%	3.1%
Wayne County	9.7%	5.3%

Source: U.S. Census Bureau 2010 and 2016-2020 American Community Survey

TABLE 10: Percent Persons (16 years & over) who are Unemployed

Poverty

According to the 2016-2020 ACS each of the three community's poverty rate was below Wayne County and the SEMCOG region. Of the three AI communities, Westland had the highest poverty rate of 13.6%, followed by Redford Township at 11.6%, and Livonia at 5.1%. Since 2010, poverty levels increased slightly in Livonia, while decreasing slightly in Westland and Wayne County. Redford saw the largest increase in poverty levels, increasing 3.7% from 7.9% in 2010 to 11.6% in 2020.

TABLE 11: PERCENT OF INDIVIDUALS BELOW POVERTY LEVEL

Municipality	Census 2010	ACS 2016-2020
Livonia	5.0%	5.1%
Redford	7.9%	11.6%
Westland	13.7%	13.6%
Wayne County	21.4%	21.3%

Source: US. Census Bureau 2010 and ACS 2016-2020

TABLE 11: Percent of Individuals Below Poverty Level

RACE, ETHNICITY, AND SPECIAL NEEDS CHARACTERISTICS

Race and Ethnicity

Broken into major racial and ethnic groupings, the makeup of the study area shows a steadily increasing minority population. This aligns with nationwide trends suggesting that the United States will be a minority-majority population over the next several decades. **Table 12** below shows that between 2010 and 2020 the AI Study Area as a whole lost White residents, while at the same time experienced significant

increases in minority population, especially in its Black population. Redford Township experienced both the greatest percentage loss of White residents and the greatest percentage increase of Black residents over this 10-year period.

TABLE 12: MAJOR RACIAL AND ETHNIC GROUPS IN 2010-2020

LIVONIA	2010	%	2020	%	% Change 2010-2020
White	87,332	90.1%	80,242	84.0%	-6.1%
Black	3,264	3.4%	4,488	4.7%	1.3%
Asian	2,441	2.5%	3,011	3.2%	0.7%
Hispanic	2,399	2.5%	3,483	3.6%	1.1%
Multi-Racial	1,205	1.2%	3,791	4.0%	2.8%
Other	301	0.3%	520	0.5%	0.2%
Total Population	**96,942**	**100.0%**	**95,535**	**100.0%**	**-**
REDFORD	2010	%	2020	%	% Change 2010-2020
White	31,292	64.7%	21,167	42.8%	-21.9%
Black	13,292	28.7%	23,163	46.8%	18.1%
Asian	399	0.8%	422	0.9%	0.1%
Hispanic	1,420	2.9%	1,878	3.8%	0.9%
Multi-Racial	1,093	2.3%	2,472	5.0%	2.7%
Other	267	0.6%	402	0.8%	0.2%
Total Population	**48,362**	**100.0%**	**49,504**	**100.0%**	**-**
WESTLAND	2010	%	2020	%	% Change 2010-2020

White	61,826	73.5%	54,273	63.5%	-10.0%
Black	14,347	17.1%	18,504	21.7%	4.6%
Asian	2,526	3.0%	3,682	4.3%	1.3%
Hispanic	3,165	3.8%	3,860	4.5%	0.7%
Multi-Racial	1,730	2.1%	4,424	5.2%	3.1%
Other	500	0.6%	677	0.8%	0.2%
Total Population	**84,094**	**100.0%**	**85,420**	**100.0%**	**-**
SEMCOG Region	**2010**	**%**	**2020**	**%**	**% Change 2010-2020**
White	3,223,281	68.5%	3,108,251	64.3%	-4.2%
Black	1,018,089	21.6%	997,657	20.7%	-0.9%
Asian	168,092	3.6%	245,417	5.1%	1.5%
Hispanic	182,970	3.9%	242,671	5.0%	1.1%
Multi-Racial	92,100	2.0%	205,178	4.2%	2.2%
Other	20,211	0.4%	31,315	0.6%	0.2%
Total Population	**4,704,743**	**100.0%**	**4,830,489**	**100.0%**	**-**

Source: SEMCOG Community Profile Data, March 2022; ACS 2016-2020

TABLE 12: Major Racial and Ethnic Groups in 2010 & 2020

The **Black/African American Population Map** and the **Hispanic/Latinx Population Map** display the concentrations of black and African American populations and Hispanic/Latinx populations within the study area. Redford has the most block groups with concentrations of black/African American populations greater than 20%. Westland follows a similar trend as Redford. Livonia only has two block groups where black/African American populations are concentrated greater than 20%. Hispanic and Latinx populations follow a similar trend (more block groups with higher concentrations in Redford and Westland than in Livonia with higher concentrations), but the block groups that have high black/African American populations do not necessarily align as the same block groups with high Hispanic/Latinx populations, though there is some overlap.

TABLE 13: MINORITY CONCENTRATIONS AND INCOME LEVELS BY CENSUS TRACT IN AI COMMUNITIES

Census Tract	% Minority residents	Income as % of 2010 MFI for area	2021 Est. MFI for Tract	Income Description
Livonia				
5561	12.68%	$64,288	Middle	5561
5562	20.76%	$98,841	Upper	5562
5563	22.09%	$94,012	Upper	5563
5564	10.78%	$123,829	Upper	5564
5565	13.78%	$102,621	Upper	5565
5566	5.17%	$126,699	Upper	5566
5567	6.90%	$103,903	Upper	5567
5568	5.56%	$119,647	Upper	5568
5569	17.46%	$101,114	Upper	5569
5570	19.20%	$81,244	Upper	5570
5571	13.61%	$104,669	Upper	5571
5572	11.31%	$85,923	Upper	5572
5573	5.89%	$109,812	Upper	5573
5574	5.93%	$136,797	Upper	5574
5575	4.41%	$117,938	Upper	5575
5576	4.13%	$125,933	Upper	5576
5577	3.24%	$106,283	Upper	5577
5579	9.25%	$106,063	Upper	5579
5580	6.35%	$94,998	Upper	5580
5581	6.16%	$97,039	Upper	5581
5582	13.91%	$99,444	Upper	5582
5583	12.01%	$76,214	Upper	5583
5584	9.49%	$92,454	Upper	5584
5585	6.01%	$84,548	Upper	5585
5586	9.49%	$91,349	Upper	5586
5587	2.99%	$96,015	Upper	5587
5588	8.54%	$93,164	Upper	5588
5589	8.61%	$95,356	Upper	5589
5590	11.22%	$95,770	Upper	5590
5591	20.96%	$95,337	Upper	5591
5592	10.89%	$84,994	Upper	5592

Census Tract	% Minority residents	Income as % of 2010 MFI for area	2010 Est. MFI for Tract	Income Description
Redford Township				
5541	44.7%	$57,544	Middle	5541
5542	34.0%	$53,832	Middle	5542
5543	24.8%	$82,331	Upper	5543
5544	46.5%	$61,626	Middle	5544
5545	31.6%	$59,001	Middle	5545
5546	17.1%	$67,868	Middle	5546
5547	31.1%	$104,066	Upper	5547
5548	55.8%	$69,922	Middle	5548
5549	49.5%	$82,513	Upper	5549
5551	36.3%	$70,845	Middle	5551
5553	50.4%	$63,296	Middle	5553
5554	80.6%	$63,748	Middle	5554
5555	52.1%	$57,022	Middle	5555
5556	34.4%	$79,153	Upper	5556
Westland				
5651	40.2%	$74,022	Middle	5651
5652	37.4%	$97,196	Upper	5652
5653	65.7%	$41,360	Moderate	5653
5656	7.9%	$90,589	Upper	5656
5657	27.8%	$96,875	Upper	5657
5658	15.5%	$68,000	Middle	5658
5659	11.3%	$66,612	Middle	5659
5670	57.9%	$59,541	Middle	5670
5671	24.3%	$53,813	Middle	5671
5672.01	17.6%	$79,637	Upper	5672.01
5672.02	23.5%	$68,044	Middle	5672.02
5673	13.2%	$72,195	Middle	5673
5674	10.3%	$75,423	Upper	5674
5678	31.6%	$85,257	Upper	5678
5679	16.7%	$91,732	Upper	5679
5680	9.6%	$98,244	Upper	5680
5682	12.6%	$79,467	Upper	5682

Census Tract	% Minority residents	Income as % of 2010 MFI for area	2010 Est. MFI for Tract	Income Description
Westland				
5683	29.9%	$61,136	Middle	5683
5684	19.5%	$62,335	Middle	5684
5685	32.8%	$26,363	Low	5685
5687	25.9%	$74,889	Middle	5687
5683	29.9%	$61,136	Middle	5683

Source: 2021 Census Report, Obtained from Government Website www.ffiec.gov

TABLE 13: Minority Concentrations and Income Levels By Census Tract in AI Communities

The **Minority Race Population Map,** the **Poverty Status Map,** and the **Low- and Moderate-Income Populations Map** collectively paint a picture about the geographic concentrations of non-white persons by block groups, as well as low-income populations by block group within each community. It should be noted that the source for these maps is American Community Survey 5-year Estimates for years 2015-2019 and 2016-2020, where data is available. It is possible that the data portrayed in the maps do not align with the data shown in **Table 13**, especially with the slightly changed grouping of "non-white persons" as opposed to "minority residents".

The **Minority Race Population Map** shows that there are not significant concentrations of minority populations within the study area. There is only one block group between the three communities that has a minority concentration greater than 45%, in northern central Westland. The **Poverty Status Map** shows that there is one block group, in southern Redford, that has a percentage of the population living below the poverty level (greater than 60%). Data indicates that most of the study area has less than 20% of its population living below the poverty line. There are a few block groups in Westland and Redford that have between 20% and 60% population living below the poverty line. There is only one block group in Livonia that has a poverty status concentration greater than 20%. The **Low- and Moderate-Income Populations Map** display block groups that have a low- and moderate-income population percentage of greater than 51.00%. Most of these block groups are in Redford and Westland, and many of these block groups overlap with block groups that have high percentages of minority populations and impoverished populations.

Population with a Disability

Population with a Disability

Disability is defined by the Census Bureau as a lasting physical, mental, or emotional conditional that makes it difficult for a person to do activities or impedes them from being able to go outside the home alone or to work. Using this definition, the AI Study Area's disabled population comprised 31,650 persons according to the 2016-2020 American Community Survey (ACS). With the exception of Westland, **Table 14** shows that Livonia and Redford had disability rates less than those of Wayne County. Both Redford and Westland have a slightly higher disability rate than Livonia. The availability of accessible housing plays a role in housing choice, as does the availability of disability services and related facilities.

TABLE 14: DISABILITY STATUS OF THE CIVILIAN NON-INSTITUTIONALIZED POPULATION

Jurisdiction	ACS 2020	Percent
Livonia	11,724	12.5%
Redford	6,929	14.8%
Westland	12,997	16.0%
Wayne County	275,590	15.8%
State of Michigan	1,401,370	14.2%

Source: U.S. Census Bureau, 2016-2020 American Community Survey (ACS) 5-Year Estimates

TABLE 14: Disability Status of the Civilian Non-Institutionalized Population

The **Disability Status Map** shows the percentage of the population living with a physical or mental disability by block group within the study area. While there is no significant concentration of block groups with a higher percentage of the population living with a disability, Westland has the most block groups that have populations with higher percentages of residents living with a disability. These subtle patterns may indicate that housing for differently abled individuals is not as readily available or affordable in Redford and Livonia, or it may indicate that there is an abundance of housing options in Westland that cater to the needs of disabled populations.

Land Use

Land Use

Roughly 43% of the study area's land use is residential; with the City of Westland having the majority of the area's land use that is considered multi-family residential use. Each community's industrial land is located along the CSX Class 1 Railroad, which is the major freight line between Detroit, Lansing, Grand Rapids, and Chicago. Both Livonia and Westland have significant commercial areas (10.4% and 8.1%, respectively). This has enabled these two communities to develop several activity generating centers, drawing people from across western Wayne County and possibly the metropolitan area. Redford Township, on the other hand, shows comparable land-use ratios but has less available land area to work

with. Its commercial and industrial uses are older and more localized, making it better equipped to serve neighborhood and local needs for shopping, and employment. All three communities have been able to use tax revenues to provide a variety of public services to residents.

The **Existing Land Use Map** shows the breakdown of land use types within the study area. Single-Family Residential land use types are the most common land use within Redford, Livonia, and Westland.

TABLE 15: LAND USE/LAND COVER IN 2020

Land Use	Livonia		Redford		Westland		Study Area	
	Acres	%	Acres	%	Acres	%	Acres	%
Agricultural	110	0.5%	7	0.1%	115	0.9%	232	0.5%
Single-family residential (including Mobile Home)	9,557	41.7%	3,289	45.7%	4,812	36.8%	17,658	40.9%
Multiple-family residential	429	1.9%	66	0.9%	792	6.1%	1,287	3.0%
Commercial	2,378	10.4%	345	4.8%	1,062	8.1%	3,785	8.8%
Industrial	1,483	6.5%	356	4.9%	402	3.1%	2,241	5.2%
Governmental/Institutional	1,913	8.3%	474	6.6%	794	6.1%	3,181	7.4%
Park, recreation, and open space	2,087	9.1%	458	6.4%	1,588	12.1%	4,133	9.6%
Airport	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Transportation, Communication, & Utility	142	0.6%	22	0.3%	71	0.5%	235	0.5%
Other (Parking/Extractive)	57	0.2%	11	0.2%	18	0.1%	86	0.2%
Vacant/Not Parceled	4,682	20.4%	2,165	30.1%	3,417	26.1%	10,264	23.7%
Water	105	0.5%	2	0.0%	14	0.1%	121	0.3%
Total Acres	**22,943**	**100%**	**7,195**	**100%**	**13,085**	**100%**	**43,223**	**100%**

SEMCOG: Community Profile Data, March 2022

TABLE 15: Land Use/Land Cover in 2020

Transportation is available for most residents in the study area. Each of the three communities offer reliable transportation options to residents, including special needs populations. Both Redford Township and Westland provide public transit to residents through the SMART bus system. SMART is the regional public transportation provider for Macomb, Oakland, and Wayne Counties. Redford Township's Connector service provides curb-to-curb bus service throughout the community and selected locations outside of Redford.

The Redford Connector tailors its schedule so that seniors can get to their appointments, but is also available to any residents who need to travel to the local grocery store, hairdresser, Redford Community

Center, or any other necessary destination. The bus runs Monday through Friday from 8:00 A.M. to 3:00 P.M. Redford seniors 62 and over/disabled populations ride for $2.00, while all other persons are charged $4.00 per trip. In Westland, SMART has partnered with the Nankin Transit Commission to provide residents ages 55 and over, and those who are physically and/or mentally challenged, with transportation for medical and non-medical trips.

The City of Livonia and Livonia Housing Commission administer three transportation assistance programs to assist Livonia residents with employment and social service needs. The programs are heavily marketed to senior citizens and persons with disabilities, but the transportation programs are not restricted to special needs populations. The City of Livonia electorate opted out the SMART regional transportation program several years ago. The local Livonia Community Transit Program was established and the City of Livonia levees .5 mills of mileage which generates $950,000 annually to operate the community transportation program. The Transit Program is a call for service program and is highly responsive to the transportation needs of residents especially elderly and disabled.

In addition to the Community Transit Program, the City of Livonia allocates federal HUD Community Development Block Grant (CDBG) funds to facilitate the Livonia Senior Van Transportation program. In recent years, CDBG funds have been allocated to sponsor senior citizen transportation with social service needs. The Livonia Housing Commission also administers a transportation program for residents of low-income Public Housing. The residents of Public Housing have limited incomes and mobility options; therefore, the Housing Commission sponsors a transportation program and has two transportation vehicles to assist Public Housing elderly and disabled residents with social service needs.

HOUSING

Housing Market Characteristics

Housing in the study area is primarily comprised of single-family detached units. This is especially true in Livonia and Redford Township, where 90.1% and 93.9% of the housing units are single-family, respectively. Although the primary housing type in Westland is also single-family, it accounts for only about 66% of the total housing stock, condominiums, apartments, and duplexes, comprising the remaining 34% of the city's total housing stock. Additionally, Westland has a greater number of mobile and manufactured homes, which comprises about 3% of its total housing units. See the below table for additional information.

TABLE 16: HOUSING UNITS BY UNIT TYPE

Municipality	1-Unit	2-Units	3- to 4-Units	5- to 9-Units	10 or More Units	Other
Livonia	33,587	123	397	1,509	1627	28
Redford Township	17,194	93	159	232	507	109
Westland	23,244	832	1,122	2,944	6357	684

Source: U.S. Census Bureau, 2016-2020 American Community Survey (ACS) 5-Year Estimates

TABLE 16: Housing Units By Unit Type

Much of the housing in the study area is older, especially in Redford Township where over 79% of owner-occupied housing and over 70% of renter-occupied housing was built prior to 1959. The majority occupied housing construction in all three communities occurred between 1940 and 1979. During this forty-year period 76.0% of Livonia's current housing stock, 87.8% of Redford's housing stock, and 71.5% of Westland's housing stock were constructed. These units are most likely to have led-based paint hazards. Evidently, a significant portion of the AI jurisdiction's housing is over 40 years old. In Redford Township, roughly 93% of all single-family homes were constructed before 1980 and these units reflect the size and configuration patterns characteristic of that era. In Livonia and Westland, about 79% and 74% of occupied housing structures were conducted prior to 1980, respectively.

Over 45% of the housing stock over 60 years old and are very likely to require ongoing maintenance and system upgrades to remain in good repair. These units are generally the most affordable but are also the most vulnerable to deterioration. This remains a major concern. Livonia and Westland experienced continued housing development in the 1980s through the 1990s and early 2000s. In Livonia, 16% of its occupied housing stock was constructed between 1980 and 2000, while in Westland nearly 21% was constructed.

Table 17 also shows that Westland has a much larger stock of rental housing (14,091 units) as compared to the other two communities (5,211 in Livonia and 4,789 in Redford).

TABLE 17: YEAR OF HOUSING CONSTRUCTION

Age of Structure	Livonia				Redford				Westland			
	Owner		Renter		Owner		Renter		Owner		Renter	
	#	%	#	%	#	%	#	%	#	%	#	%
2014 or later	92	0.3%	0	0.0%	121	0.9%	93	1.9%	105	0.5%	82	0.6%
2010 to 2013	121	0.4%	65	1.2%	65	0.5%	14	0.3%	61	0.3%	16	0.1%
2000 to 2009	1,286	4.0%	161	3.1%	202	1.5%	237	4.9%	1,140	5.4%	393	2.8%
1980 to 1999	4,779	14.9%	1,323	25.4%	368	2.7%	261	5.4%	3,781	17.9%	3,536	25.1%
1960 to 1979	12,548	39.1%	1,931	37.1%	2,055	15.2%	823	17.2%	7,130	33.8%	6,903	49.0%
1940 to 1959	11,945	37.3%	1,547	29.7%	10,128	75.0%	3,060	63.9%	8,185	38.8%	2,933	20.8%
1939 or earlier	1,289	4.0%	184	3.5%	566	4.2%	301	6.3%	690	3.3%	228	1.6%
Total occupied housing units	**32,060**	**100.0%**	**5,211**	**100.0%**	**13,505**	**100.0%**	**4,789**	**100.0%**	**21,092**	**100.0%**	**14,091**	**100.0%**

Source: U.S. Census Bureau, 2016-2020 American Community Survey (ACS) 5-Year Estimates

TABLE 17: Year of Housing Construction

Table 18 shows that all Redford Township and Westland experienced a small increase in new housing units between 2010 and 2020, much like the trend in Southeast Michigan. Livonia, much like Outer-Wayne County saw slight decreases in housing units over the last 10 years. This reflects the current trend regionally and nationally towards new construction in the outside of the inner ring of the urban core.

TABLE 18: HOUSING UNITS IN AI STUDY AREA

Jurisdiction	Housing Units 2010	Housing Units 2020	% Change 2010-2020
Livonia	40,401	40,380	-0.1%
Redford Township	20,739	20,848	2.5%
Westland	39,201	39,633	1.1%
Outer-Wayne County	821,729	790,191	-3.8%
Southeast Michigan	2,060,785	2,087,258	1.3%

Source: SEMCOG Community Profile Data – March 2022

TABLE 18: Housing Units in AI Study Area

Table 19 shows the residential vacancy rate decreased since 2010 in each of the three communities, with Redford Township and Westland seeing the largest changes in vacancy, from representing a decrease of about 28% each. Vacancy decreased by 6.2% in Livonia. In 2010, Redford had 449 fewer vacant homes than in 2010, while Westland had 961 fewer vacancies than 2010. These rather drastic decreases in vacant units is somewhat unique to the study area, as Wayne County saw a 12% increase in vacancy since 2010, and the SEMCOG (Metropolitan Detroit) area saw a decrease in vacancy of only about 1%.

While the decreases in vacancy indicate a desirability of these communities, and an increased need for public services (with an increased tax base to provide them), it is important to periodically evaluate the status of housing occupancy to be aware of potential trends and long-term effects. Substantial increases or decreased in vacant housing in the AI Study Area could greatly impacts the ability of each community to maintain and provide quality public services to their residents as each rely on property tax revenue as the key source of funding. The significance of the changing occupancy rates in the AI Study Area and the larger region can point towards a loss or gain in demand for housing and would reflect on the overall strength of the local housing market and economy.

TABLE 19: VACANCY IN AI STUDY AREA

Jurisdiction	Vacant Units 2010	Vacant Units 2019 (ACS)	Change 2010-2019
Livonia	1,687	1,582	-105
Redford Township	1,591	1,142	-449
Westland	3,315	2,354	-961
Wayne County	118,944	132,820	13,876
SEMCOG Area	215,991	213,460	-2,531

Source: SEMCOG Community Profile Data – March 2022

TABLE 19: Vacancy in AI Study Area

A large portion of homeowners moved into their home between 2000 and 2014, representing 45.3% of all housing residents in the AI Study Area. During this 14-year period, 42% of Livonia, 50% of Redford, and 46% of Westland residents moved into their current unit. This relatively new concentration of residents likely reflects that there is a demand for the supply of affordable housing for starting and first-time homebuyer households. Some units have been purchased by persons of modest means, who may or may not have the means to maintain them; others are still owned by their original occupants, who no longer have either the physical or financial ability to maintain them properly, while still others are rented. The result is that these units are subject to significant deterioration absent major investments in repair.

Additionally, the three communities have homes that are now old enough that construction styles, floor plans, the amount of living area, and other amenities offered may not always reflect contemporary preferences among homebuyers. One result is that, although many homes remain desirable, and sell easily to families who have a choice, some do not sell as easily in today's housing market. This drives middle-income households, that can maintain and upgrade such units, to other neighborhoods and maybe even to other communities. It also comes just when these homes and neighborhoods require active and aggressive maintenance, and significant levels of investment, to maintain viability. See **Table 20** for further detail.

TABLE 20: DURATION OF OCCUPANCY

Moved Into Unit	Livonia				Redford				Westland			
	Owner		Renter		Owner		Renter		Owner		Renter	
	#	%	#	%	#	%	#	%	#	%	#	%
2017 or Later	1,515	4.7%	909	17.4%	816	6.0%	598	12.5%	823	3.9%	2771	19.7%
2015 to 2016	2,529	7.9%	1,384	26.6%	830	6.1%	1,227	25.6%	1,678	8.0%	3,537	25.1%
2010 to 2014	5,530	17.2%	1,980	38.0%	2,596	19.2%	2,125	44.4%	3,989	18.9%	5,456	38.7%
2000 to 2009	7,568	23.6%	650	12.5%	3,819	28.3%	637	13.3%	4,997	23.7%	1756	12.5%
1990 to 1999	6,455	20.1%	251	4.8%	2,241	16.6%	100	2.1%	3,959	18.8%	323	2.3%
1989 or Earlier	8,463	26.4%	37	0.7%	3,203	23.7%	102	2.1%	5,646	26.8%	248	1.8%
Total	**32,060**	**100**	**5,211**	**100**	**13,505**	**100**	**4,789**	**100**	**21,092**	**100**	**14,091**	**100**
Median Year of Move	**1,515**		**4.7%**		**909**		**17.4%**		**816**		**6.0%**	

Source: U.S. Census Bureau, 2016-2020 American Community Survey (ACS) 5-Year Estimates

TABLE 20: Duration of Occupancy

All three communities have strategies in place to address the aging housing stock. Older housing typically needs maintenance and repair, for which housing rehabilitation programs have been set up. The City of Livonia offers income eligible residents loans from $5,000 - $15,000 for major home improvements to bring the home up to applicable city building codes. For minor home repair improvements, the city provides up to $5,000 in grant awards. In Redford Township income-eligible households and eligible homeowners may qualify for both major and minor home repairs. These repairs are secured by installation payment low interest loans, not to exceed $5,000. Redford also offers loans

or grants to qualified low- and moderate-income homeowners for limited repairs of hazardous housing conditions through an Emergency Rehabilitation Program. The City of Westland provides both general home rehabilitation and emergency home rehabilitation grants, loans, or deferred loans to low- and moderate-income homeowners.

Unfortunately, the difficulty of housing repair and maintenance of units constructed pre-1978 is compounded by special hazards (e.g., lead-based paint), which add complexity to the process and increase overall costs. The result is that the amount of required private and/or public investment for these properties is significant. Each community should therefore monitor these conditions as the housing stock continues to age. Certain areas in all three jurisdictions have been determined to be functionally and/or physically obsolete, and redevelopment of improper and/or obsolete land uses has been adopted in a limited number of instances. Additional redevelopment projects are possible in all three communities. This may provide opportunities for the development of new and affordable housing.

Despite the decrease in vacancy rates and population growth in Westland and Redford Township, the AI Study Area experienced a decrease in owner-occupied housing in all three communities. Redford Township experienced the greatest decline in owner-occupied housing, losing 3,136 owner-occupied units between 2010 and 2020. It should be noted that Livonia, Westland, and Redford Township have high rates of owner-occupancy; however, these decreases in owner-occupancy could signal a broader trend of unaffordability for homeowners in the southeast Michigan region. This signals an increased need for affordability measures and rehabilitation. This decline in owner-occupancy could also signal a trend of impermanence, suggesting that some residents are transient, choosing to reside where the rent is most affordable and moving around as necessary. **Table 21** also shows that, as a whole, the three-community AI Study Area lost a total of 4,147 owner-occupied housing units. Similarly, but even more drastically, Wayne County lost a total of 30,368 owner-occupied units since 2010.

TABLE 21: OWNER-OCCUPIED HOUSING

Jurisdiction	Owner-Occupied 2010	Owner-Occupied 2020	Change 2010-2020	Percent Owner-Occupied 2020
Livonia	32,777	32,721	-56	87.9%
Redford Township	16,525	13,389	-3,136	87.6%
Westland	22,249	21,267	-982	64.3%
Wayne County	464,603	434,235	-30,368	67.2%

Source: 2006-2010 & 2016-2020 American Community Survey (ACS) 5-Year Estimates

TABLE 21: Owner-Occupied Housing

Renter occupied housing units increased in all three communities within the AI Study Area. The greatest increase in renter occupied housing occurred in Redford Township where the number of renter occupied housing increased by 2,206 since 2010. **Table 22** shows that the City of Westland has the highest concentration of renter occupied housing units within the AI Study Area and just below the county and average. Livonia saw a less-significant increase in renter-occupied housing with an increase of 450 units.

TABLE 22: RENTER-OCCUPIED HOUSING UNITS

Jurisdiction	Owner-Occupied 2010	Owner-Occupied 2020	Change 2010-2020	Percent Owner-Occupied 2020
Livonia	4,479	4,929	450	13.1%
Redford Township	2,331	4,537	2,206	25.3%
Westland	12,344	13,686	1,342	37.5%
Wayne County	226,340	260,623	34,283	39.1%

Source: 2006-2010 & 2016-2020 American Community Survey (ACS) 5-Year Estimates

TABLE 22: Renter-Occupied Housing Units

Housing Affordability

There are a variety of housing types and price ranges in the AI study area. The most current data is the 2016-2020 American Community Survey 5-Year Estimates. Median home values in Redford Township and Westland decreased in the last decade, while the median home value in Livonia increased.

TABLE 23: MEDIAN HOME VALUES, 2020

Value	Livonia		Redford		Westland	
$1,000,000 or more	103	0.3%	56	0.4%	55	0.3%
$500,000 to $999,999	130	0.4%	93	0.7%	125	0.6%
$300,000 to $499,999	4,708	14.4%	249	1.9%	593	2.8%
$250,000 to $299,999	4,909	15.0%	92	0.7%	804	3.8%
$200,000 to $249,999	7,117	21.8%	252	1.9%	1090	5.1%
$175,000 to $199,999	4,333	13.2%	450	3.4%	1185	5.6%
$150,000 to $174,999	5,259	16.1%	1071	8.0%	4,046	19.0%
$125,000 to $149,999	2,705	8.3%	1614	12.1%	3,713	17.5%
$100,000 to $124,999	1,531	4.7%	2,808	21.0%	3,465	16.3%
$80,000 to $99,999	766	2.3%	2,642	19.7%	2,465	11.6%
$60,000 to $79,999	547	1.7%	2,327	17.4%	1,603	7.5%
$40,000 to $59,999	199	0.6%	1,149	8.6%	828	3.9%
$30,000 to $39,999	93	0.3%	276	2.1%	465	2.2%
$20,000 to $29,999	78	0.2%	182	1.4%	311	1.5%
$10,000 to $19,999	209	0.6%	84	0.6%	287	1.3%
Less than $10,000	34	0.1%	44	0.3%	232	1.1%
Total	**32,721**	**100.0%**	**13,389**	**100.0%**	**21,267**	**100.0%**
Median Value	**$204,300**		**$99,900**		**$131,600**	

Source: U.S. Census Bureau, 2016-2020 American Community Survey (ACS) 5-Year Estimates

TABLE 23: Median Home Values, 2020

Livonia is comprised of several affluent neighborhoods where housing values are well above $200,000 (about 52% of total units), while Redford Township and Westland have less than 6% and 12.5%, respectively, of their occupied housing units valued above $200,000 in 2020. In Redford Township and Westland typical prices vary roughly from $60,000 to $150,000, according to the 2016-2020 American Community Survey. However, in all three communities a smaller number of units can be found at either end of the value spectrum.

It is likely that many of these homes, especially those at the lower end of the value range are aging, substandard and require repair, or are dilapidated and are no longer suitable for housing. Still, a large number of decent, or potentially decent, units are affordable and are available in the AI Study Area.

Housing Problems

In Wayne County, households experiencing housing problems correlate strongly with household income.
Table 24 shows that households earning <30% HAMFI have the highest percentage of households
experiencing one or more identified housing problems. Overall, about one third of all households within
Wayne County experience 1 or more housing problems, suggesting that there is a need for housing
rehabilitation county-wide, including within Livonia, Redford Township, and Westland.

TABLE 24: HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS: WAYNE COUNTY

Wayne County Household Income	# With Problems	% With Problems	# Without Problems	% Without problems
<= 30% HAMFI	101,385	15.0%	34,195	5.1%
>30% to >=50% HAMFI	59,960	8.9%	30,290	4.5%
>50% to >=80% HAMFI	43,670	6.5%	74,980	11.1%
>80% to >=100% HAMFI	10,835	1.6%	53,730	7.9%
>100% HAMFI	13,215	2.0%	254,335	37.6%
TOTAL	**229,060**	**33.9%**	**447,525**	**66.1%**

Source: HUD CHAS 2014-2018

TABLE 24: Households with Disproportionate Housing Needs: Wayne County

In the Livonia, 10,210 households were living in housing with some type of housing problem. Housing problems can range from lacking complete plumbing or kitchen, overcrowding, or cost burden greater than 30% or 50% of income. Of all housing with problems in Livonia, a greater percentage of renter households experience housing problems (36.6%) when compared to owner households (16.3%). **Table 25** also provides an analysis of the severe housing problems by tenure in Livonia. According to **Table 25**, it appears that there are more owner households with severe housing problems (in number), but renter households experience a greater proportions of severe housing problems than owner households (17% versus less than 7%).

TABLE 25: HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS: LIVONIA

Livonia	Owner	%	Renter	%
Household has at Least 1 of 4 Housing Problems	5,170	16.3%	1,965	36.6%
Household has none of 4 Housing Problems OR Cost Burden not available, no other problems	26,570	83.7%	3,405	63.4%
Household has at Least 1 of 4 Severe Housing Problems	2,160	6.8%	915	17.0%
Household has none of 4 Severe Housing Problems OR Cost Burden not available, no other problems	29,575	93.2%	4,455	83.0%
TOTAL	**31,735**	**100.0%**	**5,370**	**100.0%**

Source: HUD CHAS 2014-2018

TABLE 25: Households with Disproportionate Housing Needs: Livonia

In Redford Township, 7,295 households were living in housing with some type of housing problem. Again, housing problems can range from lacking complete plumbing or kitchen, overcrowding, or cost burden greater than 30% of income. Additionally, of all owner-occupied housing with problems in Redford Township, 19% of households experience housing problems and 8.7% experience severe housing problems. For renters, 45% of household experience housing problems while 29.3% experience severe housing problems. **Table 26** indicates that there are only slightly more owner households that experience some form of housing problem (3,665 owner households versus 3,630 renter households), this represents a significantly smaller portion of all available owner households than renter households.

TABLE 26: HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS: REDFORD

Redford Township	Owner	%	Renter	%
Household has at Least 1 of 4 Housing Problems	2,510	19.0%	2,200	45.1%
Household has none of 4 Housing Problems OR Cost Burden not available, no other problems	10,710	81.0%	2,675	54.9%
Household has at Least 1 of 4 Severe Housing Problems	1,155	8.7%	1,430	29.3%
Household has none of 4 Severe Housing Problems OR Cost Burden not available, no other problems	12,060	91.2%	3,445	70.7%
TOTAL	**13,220**	**100.0%**	**4,875**	**100.0%**

Source: HUD CHAS 2014-2018

TABLE 26: Households with Disproportionate Housing Needs: Redford

In the City of Westland, 16,990 households were living in housing with some type of housing problem. Again, housing problems can range from lacking complete plumbing or kitchen, overcrowding, or cost burden greater than 30% of income. In Westland, renter households experience a greater degree of housing problems than do owner households, in both number and proportion. Nearly 50% of renter households experience housing problems, and over 25% experience severe housing problems. According to **Table 27**, it appears that renter households have a disproportionate housing need when compared to owner households (48.5% versus 21.3% housing problems, and 25.2% versus 10.0% severe housing problems).

TABLE 27: HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS: WESTLAND

Redford Township	Owner	%	Renter	%
Household has at Least 1 of 4 Housing Problems	4,475	21.3%	6,855	48.5%
Household has none of 4 Housing Problems OR Cost Burden not available, no other problems	16,540	78.7%	7,275	51.5%
Household has at Least 1 of 4 Severe Housing Problems	2,105	10.0%	3,555	25.2%
Household has none of 4 Severe Housing Problems OR Cost Burden not available, no other problems	18,910	90.0%	10,575	74.8%
TOTAL	**21,015**	**100.0%**	**14,130**	**100.0%**

Source: HUD CHAS 2014-2018

TABLE 27: Households with Disproportionate Housing Needs: Westland

Notes: 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%.

Table 28 shows that the City of Westland has the most affordable rents of the three communities and are likely at or below the fair market rent for Wayne County as established by HUD for fiscal years 2012 and 2012 (Table 29).

TABLE 28: RENTAL RATES FOR RENTER-OCCUPIED HOUSING UNITS

Contract Rent	Livonia		Redford		Westland	
	#	%	#	%	#	%
Less than $500	421	8.5%	354	7.8%	1,445	10.6%
$500 - $999	2,446	49.6%	2,323	51.2%	9,835	71.9%
$1,000 - $1,499	1,531	31.1%	1,505	33.2%	1,832	13.4%
$1,500 - $1,999	197	4.0%	32	0.7%	99	0.7%
$2,000 - $2,499	48	1.0%	0	0.0%	64	0.5%
$2,500 - $2,999	40	0.8%	0	0.0%	66	0.5%
$3,000 or more	48	1.0%	0	0.0%	0	0.0%
No Rent Paid	198	4.0%	323	7.1%	345	2.5%
Total Units	4,929	100.0%	4,537	100.0%	13,686	100.0%
Median Rent	$934		$918		$797	

Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

TABLE 28: Rental Rates for Renter-Occupied Housing Units

TABLE 29: FAIR MARKET RENT (WAYNE COUNTY, MI)

Fair Market Rents (FMR's)	2012	2022
Efficiency	$586	$733
One-Bedroom	$667	$848
Two-Bedroom	$798	$1,084
Three-Bedroom	$954	$1,371
Four-Bedroom	$984	$1,473

Source: HUDuser.org, FY2022 & FY2012

TABLE 29: Fair Market Rent (Wayne County, MI)

A look at minority renter housing needs in each community will further inform our study of rental housing conditions in each community. **Tables 30-32** refer to data on minority needs, as well as the entire population, in order to identify any significant differences in need.

Table 30 provides data related to households that experience a cost burden of >30% of income, and those that experience severe housing costs burden (>50% of income) by income group for the City of Livonia. According to 2014-2018 HUD-CHAS data, the City of Livonia has 6,905 households that experience cost

burden, and 2,710 that experience severe cost burden. According to **Table 30**, when looking at severe cost burden it appears that extremely low-income households (<30% HAMFI) experience a disproportionate housing need when compared to other income groups.

TABLE 30: HOUSEHOLDS WITH SEVERE HOUSING COST BURDEN: LIVONIA

Livonia	# With Cost Burden >30%	% With Severe Cost Burden >50%
<= 30% HAMFI	1,620	1,400
>30% to >=50% HAMFI	1,735	750
>50% to >=80% HAMFI	2,020	435
>80% to >=100% HAMFI	730	60
>100% HAMFI	800	65
TOTAL	**6,905**	**2,710**

Source: HUD CHAS 2014-2018
Note: Severe housing cost burden is defined as greater than 50% of income.

TABLE 30: Households with Severe Housing Cost Burden: Livonia

Table 31 provides data related to households that experience a cost burden of >30% of income, and those that experience severe housing costs burden (>50% of income) by income group for Redford Township. According to 2014-2018 HUD-CHAS data, the Redford Township has 4,500 households that experience cost burden, and 2,335 that experience severe cost burden. Nearly half of the renter households experiencing severe cost burden fall within the <30% HAMFI income group.

TABLE 31: HOUSEHOLDS WITH SEVERE HOUSING COST BURDEN: REDFORD

Redford	# With Cost Burden >30%	% With Severe Cost Burden >50%
<= 30% HAMFI	1,690	1,430
>30% to >=50% HAMFI	1,095	625
>50% to >=80% HAMFI	1,385	280
>80% to >=100% HAMFI	240	0
>100% HAMFI	90	0
TOTAL	**4,500**	**2,335**

Source: HUD CHAS 2014-2018
Note: Severe housing cost burden is defined as greater than 50% of income.

TABLE 31: Households with Severe Housing Cost Burden: Redford

Table 32 provides data related to households that experience a cost burden of >30% of income, and those that experience severe housing costs burden (>50% of income) by income group for the City of Westland. According to 2014-2018 HUD-CHAS data, Westland has 10,855 households that experience cost burden, and 5,060 that experience severe cost burden.

TABLE 32: HOUSEHOLDS WITH SEVERE HOUSING COST BURDEN: WESTLAND

Redford	# With Cost Burden >30%	% With Severe Cost Burden >50%
<= 30% HAMFI	3,625	3,050
>30% to >=50% HAMFI	3,115	1,420
>50% to >=80% HAMFI	3,160	475
>80% to >=100% HAMFI	620	75
>100% HAMFI	335	30
TOTAL	**2,524**	**5,060**

Source: HUD CHAS 2014-2018
Note: Severe housing cost burden is defined as greater than 50% of income.

TABLE 32: Households with Severe Housing Cost Burden: Westland

It should be noted that there are some adverse living conditions in rental housing in the study area, experienced primarily by those lowest income groups (<30% HAMFI and >30% to >50% HAMFI). This is probably due to the tendency of renter households to have less income than owner households. All three communities are working to provide owner housing opportunities for those who currently rent. Rehabilitation and rental assistance should also be considered for rental units.

The generally accepted definition of affordability, according to HUD, is for a household to pay no more than 30% of its annual income on housing. Families who pay more than 30% of their income for housing are considered cost burdened and may have difficulty affording other necessities such as food, clothing, transportation, and medical care. The lack of affordable housing is a significant hardship for low-income households preventing them from meeting their other basic needs. As of June 2022, housing values are currently well below income growth as labor markets work to keep up with inflation and the growing housing market. As a result, there are several downward pressures that keep housing out of reach to many families and keep homeowners from maintaining homes to a high standard. Primarily in the region and in the AI study area, housing costs are outpacing increases in income.

It should be noted that although the addition of transportation costs to housing affordability does provide a "better" picture of the true costs, there are other costs, in particular the direct and indirect costs of living in higher poverty vs. lower poverty communities that should also be considered. For instance, when evaluating neighborhood costs and benefits, indirect factors such as quality of local

schools, access to employment, exposure to environmental hazards, exposure to crime, health outcomes, and quality of municipal and social services, should also be considered.

Additionally, homeownership may be difficult for many lower-income and lower-income minority households to achieve in many segments of the market. Unable to afford the costs of homeownership and other necessities, they may find renting or home-sharing to be more realistic options. The cost of homeownership, while not an impediment to fair housing per se, certainly affects the ability of many minority households to obtain decent housing.

PUBLIC HOUSING DEVELOPMENTS IN AI JURISDICTIONS

City of Livonia

- **McNamara Towers:** 136 units. Elderly Public Housing - serving low- and moderate-income seniors and disabled individuals 55 and older.
- **William Brashear Tower**: 196 units. Section 8 & barrier-free units - serving seniors aged 62 and older.
- **Livonia Opportunity House**: 16 units. Subsidized low-rent, affordable housing for disabled adults.
- **Ziegler Place**: 140 units. Section 8 & barrier-free units, serving low- and moderate-income elderly and disabled families.
- **Trinity Park**: 8 units. Subsidized low-rent, affordable housing for seniors.
- **Newburgh Village**: 120 units. Retirement community serving low- and moderate-income seniors and disabled adults 55 and older.
- **Silver Village**: 108 units. Retirement community serving low- and moderate-income seniors and disabled adults 55 and older.

TABLE 33: LIVONIA PUBLICLY SUPPORTED HOUSING UNITS

Housing Type	#
Public Housing	150
Project-based Section 8	352
Housing Choice Voucher (HCV)	63
TOTAL	565

Source: AFFH Data Tool; accessed May 2022.
*Livonia Housing Commission supports about 900 families through the HCV program.
TABLE 33: Livonia Publicly Supported Housing Units

Redford Township

- **Coventry Place**: 97 units. Serving low- and moderate-income seniors.

- **Redford Opportunity House**: 6 units. Subsidized low-rent, affordable housing for seniors.

TABLE 34: REDFORD TWP. PUBLICLY SUPPORTED HOUSING UNITS

Housing Type	#
Project-based Section 8	63
Housing Choice Voucher (HCV)	457
Other Multifamily	39
TOTAL	**559**

Source: AFFH Data Tool; accessed May 2022

TABLE 34: Redford Twp. Publicly Supported Housing Units

City of Westland

- **Greenwood Villa**: 298 units. Serving low- and moderate-income seniors (accepts Section 8).

- **Thomas F Taylor Towers:** 266 units. Subsidized barrier-free, low-rent units.

- **Village of Our Saviour's Manor:** 49 units. Affordable senior living community for seniors 62 and older.

- **Liberty Hill Housing**: 9 units. Low-income housing for individuals with disabilities.

- **Westgate Towers:** 148 units. Affordable housing for seniors. Barrier-free and accepts Section 8.

TABLE 35: WESTLAND PUBLICLY SUPPORTED HOUSING UNITS

Housing Type	#
Project-based Section 8	561
Housing Choice Voucher (HCV)	844
Other Multifamily	58
TOTAL	**1,463**

Source: AFFH Data Tool; accessed May 2022

TABLE 35: Westland Publicly Supported Housing Units

SENIOR HOUSING FACILITIES

Newburgh Village and Silver Village, provide affordable housing for the low-income and disabled elderly population. The Livonia Housing Commission will be developing a third senior housing facility with a proposed 120 units, Newburgh Village II, thereby allowing seniors who can no longer stay in their single-family home the ability to remain in affordable housing. Income and age limitations apply.

- Newburgh Village – 120 garden-style apartments located adjacent to Edward Hines Nature & Recreation Park.

- Silver Village – 108 garden-style apartments ideally located near the municipal civic center, 49 acres of city parkland, and the YMCA.

Institutional Analysis

Lending Practices and Public/Private Policy

MORTGAGE LENDING AND HMDA DATA ANALYSIS

Aggregate home mortgage, and refinancing and improvement loan transaction data for the Detroit-Livonia-Dearborn MSA can indicate patterns or trends in mortgage banking. This data is made available to the public through the Home Mortgage Disclosure Act (HMDA). Disclosure is required of financial institutions by the Federal Government, and the resulting reports provide summaries for loan approvals, denials, and withdrawals for federally insured and conventional mortgages, mortgage refinancing, and home improvement loans.

In many cases, data is aggregated for the Detroit metropolitan area as a whole; as such, it must be assumed that lending practices and patterns in the AI Study Area (Livonia, Westland, and Redford Township) are similar to those experienced elsewhere in the larger MSA region. This information is provided in **Tables 36 – 40**. All data was derived from the HMDA website, www.ffiec.cfpb.gov/data-browser/, accessed in May 2022.

Financing institutions can take one of several actions pertaining to the mortgage loan application:
- "Loan originated" indicates that the loan was made by the lending institution/
- "Approved, not accepted" represents loans approved by the lender, but not accepted by the applicant. This generally occurs if better terms are found at another lending institution.
- "Denied" defines a situation where the loan application failed.
- "Withdrawn" means that the applicant closed the application process.
- "Determined incomplete" means that the loan application process was closed by the institution due to incomplete information.

Table 36 displays the actions taken for loans in each of the three AI Study Area communities. For all three communities conventional loans had both the highest origination and denial rates. The data

presented in **Table 36** does not show a significant concentration of loan denials in any one particular community.

TABLE 36: DISPOSITION OF LOAN APPLICATIONS BY TYPE

DETROIT-LIVONIA-DEARBORN, MSA, 2020

	Conventional	Federally Insured	Veterans Affairs Guaranteed
Livonia			
Loan Originated	5,578	486	281
Approved, not accepted	203	25	8
Denied	582	93	46
Withdrawn	844	104	60
Determined incomplete	277	60	16
Redford Township			
Loan Originated	1,090	533	89
Approved, not accepted	54	23	11
Denied	305	122	21
Withdrawn	260	119	30
Determined incomplete	87	57	15
Westland			
Loan Originated	2,296	533	196
Approved, not accepted	91	31	13
Denied	414	99	47
Withdrawn	358	130	52
Determined incomplete	179	65	24

Source: HMDA Data Browser, 2020

TABLE 36: Disposition of Loan Applications by Type

In 2020, denial rates for Black applicants ranged from 17.2% for federally insured home purchases to 29.3% for conventional loan applications. This is nearly 6% and over 18% higher than the denial percentage for White applicants for the same loans within the Detroit-Livonia-Dearborn MSA (**Table 37**). Asian applicants were denied at a higher rate than any other race or ethnicity for VA loan applications (18.5%); however, it should be noted that there was a relatively small amount of loans applications received when compared to Hispanic applicants (9.9% denial rate), White applicants (9.8% denial rate), Black applicants (16.1% denial rate), and applicants of other or mixed races (8.2% denial rate). With the

exception of FSA/RHS loans, white loan denial rates are lower than Black, Hispanic, and Asian loan denial rates.

It is also important to consider the criteria for home refinancing loans since they allow mortgagers to take advantage of lower interest rates, obtain better terms, and thereby improve their financial position. With home purchases and values on the rise in the region, refinance loans are critical for mortgagers in the metro Detroit region. Additionally, they make the cost of housing less expensive and enable those who use them to lower housing costs, make necessary improvements, or move to better housing. Here too, the data diverges between the various groups.

TABLE 37: DISPOSITION OF LOAN APPLICATIONS BY RACE/ETHNICITY

DETROIT-LIVONIA-DEARBORN, MSA, 2020

	Federally Insured (FHA)	Conventional	FSA/RHS	VA
White Received	**5,627**	**46,616**	**23**	**2,402**
Originated	3,604	31,557	15	1,536
Denied	647	5,172	4	235
Other Disposition	1,376	9,887	4	631
Black Received	**3,025**	**6,710**	**3**	**732**
Originated	1,703	3,066	1	416
Denied	519	1,963	0	118
Other Disposition	803	1,648	2	198
Hispanic Received (any race)*	**531**	**2,710**	**1**	**162**
Originated	341	1,583	1	107
Denied	78	538	0	16
Other Disposition	112	589	0	39
Asian Received	**113**	**4,065**	**0**	**27**
Originated	55	2,669	0	16
Denied	19	448	0	5
Other Disposition	39	948	0	6
Other Received**	**4,732**	**15,336**	**19**	**1,365**
Originated	1,187	8,028	1	543
Denied	403	2,282	0	112
Other Disposition	3,142	5,026	18	710

Source: HMDA Data Browser, 2020
*Includes Joint Hispanic/Not Hispanic Applications
**Including Race Not Available

TABLE 37: Disposition of Loan Applications by Race/Ethnicity

The major reasons given for application denial are also of great importance when analyzing trends in mortgage lending. **Table 38** provides the six major reasons loans were denied in 2020. For all races and ethnicities, the three main reasons for denial were 1) poor credit history, 2) unfavorable debt-to-income ratio, and 3) collateral.

TABLE 38: REASONS FOR DENIAL OF LOAN APPLICATIONS

DETROIT-LIVONIA-DEARBORN, MSA, 2020

	Federally Insured	Conventional	Refinance	Home Improvement
White Applicants	**647**	**5,712**	**4**	**235**
Debt-to-Income Ratio	125	1,547	1	22
Employment History	19	121	0	6
Credit History	147	1,306	2	83
Collateral	133	896	1	35
Credit Application Incomplete	104	542	0	46
Other	119	760	0	43
Black Applicants	**519**	**1,963**	**0**	**118**
Debt-to-Income Ratio	106	428	0	12
Employment History	18	25	0	1
Credit History	122	858	0	53
Collateral	126	295	0	16
Credit Application Incomplete	36	127	0	16
Other	111	230	0	20
*Hispanic Applicants (any race)**	**61**	**399**	**0**	**13**
Debt-to-Income Ratio	8	101	0	3
Employment History	4	14	0	1
Credit History	11	136	0	4
Collateral	18	62	0	1
Credit Application Incomplete	7	35	0	2
Other	13	51	0	2
*Other Applicants***	**422**	**2,730**	**0**	**117**
Debt-to-Income Ratio	73	801	0	10
Employment History	19	61	0	2
Credit History	83	623	0	38
Collateral	107	502	0	21
Credit Application Incomplete	58	349	0	27
Other	82	394	0	19

Source: HMDA Data Browser, 2020
*Does not include Joint Hispanic/Not Hispanic Applicants
**Including Race Not Available

TABLE 38: Reasons for Denial of Loan Applications

Poor credit history was the top reason Black applicants were denied loans conventional, refinance, and home improvement loans. Issues with collateral was the top reason Black applicants were denied federally insured loans. The leading reason for denied loans for White applicants was poor debt-to-income ratio and poor credit history. Both credit history and debt-to-income ratio had similar denial rates across loan type. For Hispanic applicants, credit history is the major reason for denial. However, denials due to poor credit history were not as significant for Hispanic applicants as they were for Black and White applicants. While there are differences in approval rates between all races and ethnicities the differences between Black applicants appear to be higher than White applicants.

PRIVATE POLICIES AND PRACTICES

The real estate industry has been the target of much criticism concerning unprofessional, unethical, or illegal practices which could affect fair housing. Reforms governing real estate qualifications and practices have been set in place over the past 40 years, and virtually every real estate agent and firm is required to train staff and adhere to specific conduct standards concerning fair housing. This has helped to reduce the instance of blatantly discriminatory and otherwise unprofessional practices in the industry, and has helped open the housing market for qualified buyers.

PUBLIC POLICIES AND PRACTICES

Racial and ethnic minorities have often raised concerns about the provision of unequal or discriminatory public safety and other human services. All three communities have experienced significant increases in minority populations over the last ten years. Although Livonia has a significantly smaller minority population than Redford or Westland, the trend for all three communities points to a continuing loss of majority (i.e., White) population and increase in minority (i.e., Black, Hispanic, Asian, etc.) populations. All three communities are aware of the need to provide services on an equal basis and have targeted essential services for low-income and minority residents.

Additionally, each community has undertaken many activities to provide affordable and fair housing for all residents and has made the provision of affordable housing its number one community development priority by allocating a large percentage of CDBG program funds for housing rehabilitation designed to meet the needs of the extremely-low-income, very-low-income, low-income, and moderate-income populations, and persons with special needs. Some specific examples of local policies and practices follow:

<u>Community Development Block Grant</u>

- In its most recent consolidated plan (through 2021), Livonia targeted its CDBG and related funds to improving the condition of housing, increasing the supply of affordable housing, improving access to affordable housing, reducing the cost burden for renter households, and reducing blight. Additionally, the city provided funding for essential human services including domestic abuse prevention, mental health counseling, transportation assistance, payment assistance, and fair housing services to citizens. The Lansing Housing Commission runs a robust program to provide public housing and supportive housing opportunities for qualifying populations.

- Redford Township has focused its CDBG program on the provision of housing rehabilitation services, providing special guidance related to fair housing and homeownership when possible. The township also funded public services including senior programming, assistance to those families at risk of homelessness, transportation, crime prevention, and youth services. The township focuses a large portion of its CDBG funding into blight removal and the SNAP/SNAP II programs to increase homeownership opportunities, improve housing quality, and reduce barrier to accessing affordable housing. Some of the beneficiaries are minority residents, including non-residents. The township entered into an agreement with the Michigan State Housing Development Authority (MSHDA) to have that entity provide rental assistance vouchers to income-eligible families.

- Westland has allocated its CDBG funds to housing rehabilitation and public improvements in CDBG-eligible areas and to target populations, such as the elderly, youth, and domestic violence survivors. These funds are directed to all types of housing including, homeowners, renters, and first-time homebuyers. The Westland Housing Commission implemented an extensive program to provide housing voucher assistance for those living in privately-owned dwelling units.

<u>Section 8 and Housing Choice Voucher Programs</u>

The U.S. Department of Housing and Urban Development (HUD) provides financial housing assistance to eligible low-income families based upon income. The amount the family pays for rent and utilities will generally not exceed 30% of income. Family income must be within HUD guidelines for household size in order to qualify. Owners of rental properties must comply with HUD program requirements. The rent for a property must be reasonable and must pass the HUD Housing Quality Standards.

- The Livonia Housing Commission currently assists approximately 909 families (according to the 2016-2021 consolidated plan).

- The Westland Housing Commission currently assists approximately 1,244 families (according to the 2021-2025 consolidated plan).

Equal Housing Opportunity Plans

Livonia, Redford Township and Westland have adopted Equal Housing Opportunity Plans which strive to reach out to lower-income families, to promote more housing opportunities for families outside low-income and minority-impacted areas, to promote employment opportunities in employment practices, and to promote business opportunities in housing programs for Section 3, women- and minority-owned businesses.

Other Public Actions to Address Housing and Service Needs:

All three communities have homebuyer and housing rehabilitation programs.

- Livonia, Redford Township and Westland offer an emergency rehabilitation program for qualified low- and moderate-income homeowners to make limited repairs of hazardous housing conditions that may jeopardize the health or safety of a homeowner, e.g., fuse panel for electrical services, furnace, water break, roof leak or sewer back up.
- All three communities have established ongoing and productive relationships with private lenders. These entities have assisted lower income homebuyers by providing low cost, flexible mortgage products. These relationships were significant in regard to implementation of the Neighborhood Stabilization Program (NSP), placing qualified homeowners into previously foreclosed and vacant homes.
- Redford Township provides barrier free home access grants, loans, or deferred loans for low- and moderate-income homeowners to improve accessibility and convenience for persons with permanent physical handicaps. Westland also provides low interest loans.
- Livonia, Redford Township and Westland enacted rental certification ordinances, with inspections conducted every two years. This ordinance has been combined with code enforcement, and with demolition efforts, and with locally- and federally funded infrastructure improvements, to make a significant impact on removing incipient blight from the community.
- All three communities are members of the Out-Wayne County Coalition on Homelessness, and have been able to tap into, that organization's resources to better serve the homeless population.

INTEGRATION AND ISOLATION

In order to affirmatively further fair housing, the cities of Westland and Livonia, and Redford Township must recognize barriers to fair housing choice and provide actions to increase choice. An analysis of isolation and integration across the city 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 in these AI communities, 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 indicates that racial separation has diminished since the 1960s. The report, published by the Manhattan Institute for Policy Research, 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. 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.

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, DC according to "A Right to Housing: Foundation for a New Social Agenda" published by Temple University. 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." 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 Land Institute, which published "Residential Segregation and Low-Income Working Families." 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 highways system are still felt today, in areas of the New York City, (e.g., the Bronx), Detroit (Mexicantown & 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 polices that remain pervasive in this country.

INTEGRATION AND ISOLATION IN LIVONIA, WESTLAND, AND REDFORD TOWNSHIP

Areas of racial integration and isolation can be found in the Livonia, Westland, and Redford Township. Non-White persons make up 18.3% of the total population of these AI communities. Based on this percentage, an assumption can be made that a Census tract with at least 13.8 percent people that

identify as non-white would be fairly integrated per the local averages. Census tracts with percentages much higher or much lower than 13.8 percent would be considered more isolated for the demographic group that lives in the Census Tract. For example, Census Tract 5554 has the highest percentage (86.71 percent) of Non-White populations and therefore minority populations are isolated within this neighborhood.

HUD defines racial concentration as an area having more than 50 percent non-White/Caucasian population. Within the AI Study Areas, there are ten Census tracts that meet HUD's definition (indicated with an asterisk).

TABLE 39: CONCENTRATIONS OF MINORITY POPULATIONS BY CENSUS BLOCK GROUP

Census Tract	Municipality	Total Population	Total Minority Population	% of Total
AI Study Area	All	222,021	59,648	26.87%
5541*	Redford Township	3,937	2,122	53.90%
5542	Redford Township	2,809	1,015	36.13%
5543	Redford Township	4,882	2,057	42.13%
5544*	Redford Township	3,454	2,279	65.98%
5545	Redford Township	2,682	1,293	48.21%
5546	Redford Township	3,339	912	27.31%
5547*	Redford Township	3,072	1,669	54.33%
5548*	Redford Township	3,148	1,582	50.25%
5549	Redford Township	3,298	1,566	47.48%
5551	Redford Township	4,437	1,428	32.18%
5553*	Redford Township	3,387	2,474	73.04%
5554*	Redford Township	2,529	2,193	86.71%
5555*	Redford Township	2,999	1,921	64.05%
5556	Redford Township	2,838	1,065	37.53%
5561	Livonia	3,359	826	24.59%
5562	Livonia	2,705	379	14.01%
5563	Livonia	3,236	406	12.55%
5564	Livonia	4,280	426	9.95%
5565	Livonia	1,971	392	19.89%
5566	Livonia	3,667	297	8.10%
5567	Livonia	2,519	213	8.46%
5568	Livonia	1,771	230	12.99%

5569	Livonia	3,767	734	19.49%
5570	Livonia	3,088	486	15.74%
5571	Livonia	2,462	638	25.91%
5572	Livonia	1,888	157	8.32%
5573	Livonia	2,122	198	9.33%
5574	Livonia	3,191	361	11.31%
5575	Livonia	3,835	195	5.08%
5576	Livonia	2,862	111	3.88%
5577	Livonia	4,254	112	2.63%
5579	Livonia	4,052	339	8.37%
5580	Livonia	4,329	504	11.64%
5581	Livonia	3,377	499	14.78%
5582	Livonia	4,549	945	20.77%
5583	Livonia	1,619	173	10.69%
5584	Livonia	4,478	532	11.88%
5585	Livonia	3,563	221	6.20%
5586	Livonia	1,803	186	10.32%
5587	Livonia	2,700	194	7.19%
5588	Livonia	2,683	302	11.26%
5589	Livonia	1,848	237	12.82%
5590	Livonia	2,767	330	11.93%
5591	Livonia	2,542	347	13.65%
5592	Livonia	2,210	308	13.94%
5651	Westland	3,377	1,404	41.58%
5652	Westland	4,989	2,162	43.34%
5653.01*	Westland	2,294	1,606	70.01%
5653.02	Westland	4,328	1,960	45.29%
5656	Westland	2,117	88	4.16%
5657	Westland	3,211	717	22.33%
5658	Westland	3,347	469	14.01%
5659	Westland	2,437	412	16.91%
5670*	Westland	4,103	2,984	72.73%
5671	Westland	3,185	545	17.11%
5672.01	Westland	3,707	293	7.90%
5672.02	Westland	2,559	863	33.72%
5673	Westland	4,543	593	13.05%
5674	Westland	2,614	212	8.11%
5678	Westland	4,448	1,301	29.25%
5679	Westland	3,271	595	18.19%

5680	Westland	1,809	350	19.35%
5682	Westland	3,866	794	20.54%
5683	Westland	3,982	1,182	29.68%
5684	Westland	4,052	987	24.36%
5685	Westland	3,829	1,183	30.90%
5687	Westland	3,703	1,604	43.32%
5688*	Westland	3,100	2,020	65.16%
5689	Westland	2,842	470	16.54%

Census tracts with the highest concentration of minority populations

Census tracts the most representative of the overall City percentage for minority populations

Source: 2016-2020 American Community Survey 5-Year Estimates

TABLE 39: Concentrations of Minority Populations by Census Block Group

Local Practices

Fair Housing

FAIR HOUSING AGENCIES

The jurisdictions have the ability to enforce fair housing requirements and can use the offices of various Federal and/or State agencies. These include:

U.S. Government:

- Department of Housing and Urban Development - Office of Fair Housing and Equal Opportunity
- Department of Justice
- Department of Treasury
- Environmental Protection Agency
- Department of Labor

State of Michigan:

There are a number of state agencies responsible for enforcing fair housing law, from real estate practices to mortgage approval and homeowner's insurance. Anyone who believes that they have been unlawfully discriminated against in housing is able to get assistance from the State, including counseling and representation, if necessary. The State of Michigan's fair housing laws are substantially equivalent with Federal statutes, meaning that they provide the same level of protection to protected individuals that the Federal government would.

Local and Municipal:

The Township of Redford relies on HUD, and the State of Michigan to counsel and represent aggrieved individuals and families. Its Community Development and Home Maintenance Departments also provide guidance to individuals and families on fair housing concerns.

Both Livonia and Westland contract with the Fair Housing Center of Metropolitan Detroit (FHC) to provide technical and consultative services. Examples include FHC training of housing commission board

members and staff on fair housing requirements, advocating for those who may have experienced unlawful discrimination, and conducting fair housing testing within each city.

Finally, the Housing Commissions in both Livonia and Westland provide guidance to individuals and families on fair housing concerns.

Other Protections:

Private organizations, notably the Fair Housing Center of Metro Detroit, actively monitor fair housing activity in the area and stand ready to provide necessary assistance to aggrieved individuals.

REDFORD TOWNSHIP FAIR HOUSING ACTIVITIES SUMMARY (2017 – 2022)

1. The township keeps updated information related to barrier-free access, emergency rehabilitation, lead-based paint, and housing rehabilitation readily available on its website.
2. The previous Analysis of Impediments to Fair Housing Choice is available on the township website for resident access and information.
3. On the City's official website, http://redfordtwp.com/, visitors to the site can follow the Community Development Department links to find general information regarding fair housing. The website also directs visitors to appropriate contacts at the Township that can help guide residents to resources and information related to fair housing.
4. The township provides all residents and participants with referral assistance advice for reporting fair housing complaints. The township will investigate the possibility of providing information in other languages as necessary (i.e., Spanish, Arabic).
5. The township continues to prioritize housing rehabilitation with federal funding to promote and provide decent and affordable housing for all residents, regardless of background.

WESTLAND FAIR HOUSING ACTIVITIES SUMMARY (2017 – 2022)

1. The city maintains a homebuyer assistance program and a homeowner rehabilitation program to promote fair housing opportunities for all residents.
2. Westland runs the Neighborhood Stabilization Program to assist low- and moderate-income households and to stabilize communities with high rates of vacancy.
3. The current Analysis of Impediments to Fair Housing Choice is available on the city's website: https://www.cityofwestland.com/

4. The Westland Housing Commission maintains updated information about Housing Choice Vouchers and public/supportive housing programs.

5. The city promoted the concept and meaning of equal housing opportunities by providing constituents with information on specific housing resources including information on publicly assisted housing opportunities. The city's website has a brochure about expanding housing access.

6. The city makes significant efforts to extend assistance to minorities, elderly and single-headed householders who may have fewer housing options available to them via encouraging the presence of these groups in the community by following up on all referrals made to persons investigating rental housing opportunities.

LIVONIA FAIR HOUSING ACTIVITIES SUMMARY (2017 – 2022)

1. The city's document center, through their website http://www.livonia.gov/, hosts a document that provides a briefing on Fair Housing and Equal Opportunity.

2. The city remains a partner with the Fair Housing Center of Metro Detroit.

3. The city provides referrals, as needed, for fair housing complaints and other fair housing resources.

4. The city maintains the current Analysis of Impediments to Fair Housing Choice on its website.

5. Livonia continues to allocate federal grant funding to housing rehabilitation and affordable housing efforts, as well as towards reducing cost burdens for renters.

FAIR HOUSING COMPLAINTS

The Fair Housing Center of Metropolitan Detroit (FHC) provides annual reports of fair housing complaints (and fair housing compliance). **Table 40** provides an overview of the number of complaints that have occurred in each community between 2017 and May 9, 2022. The highest number of complaints for all three communities involved race and disability status concerns. Considering the size of the jurisdictions, this is a surprisingly small number of complaints over a five-year period, and may be attributable to efforts by the communities to work with citizens, non-residents, and with members of the real estate community to ensure open and fair housing.

Both Livonia and Westland have used the Fair Housing Center as a fair housing consultant. The FHC has helped develop operating guidelines and assessing whether specific landlord practices were legal and advisable. This relationship has been instrumental in helping the cities develop a record of fair and impartial Housing Choice Voucher administration.

TABLE 40: FAIR HOUSING COMPLAINTS BY JURISDICTION REPORTED BY THE FAIR HOUSING CENTER OF METRO DETROIT (2017 – 2022)

Livonia	2017	2018	2019	2020	2021	2022	Complaint Total
Religion	0	0	0	0	0	0	0
Race	0	2	0	0	2	0	4
Color	0	0	0	0	0	0	0
National Origin	0	0	0	0	2	0	2
Age	0	0	0	0	0	0	0
Sex	0	0	0	0	0	0	0
Familial Status	0	0	0	0	0	0	0
Marital Status	0	0	0	0	0	0	0
Disability	0	1	1	0	3	0	5
Source of Income	0	0	0	0	0	0	0
Annual Total	**0**	**3**	**1**	**0**	**7**	**0**	11
Westland	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**Complaint Total**
Religion	0	0	0	0	0	0	0
Race	2	3	0	4	1	0	10
Color	0	0	0	0	0	0	0
National Origin	0	0	0	0	0	0	0
Age	0	0	1	0	0	0	1
Sex	0	0	1	0	1	0	2
Familial Status	1	0	0	0	0	0	1
Marital Status	0	0	0	0	0	0	0
Disability	7	5	4	2	3	0	21
Source of Income	0	0	0	0	0	0	0
Annual Total	**10**	**8**	**6**	**6**	**5**	**0**	35

Redford	2017	2018	2019	2020	2021	2022	Complaint Total
Religion	0	0	0	0	0	0	0
Race	0	3	0	0	1	0	4
Color	0	0	0	0	0	0	0
National Origin	0	0	0	0	0	0	0
Age	0	0	0	0	0	0	0
Sex	0	0	0	0	0	0	0
Familial Status	0	0	0	0	1	0	1
Marital Status	0	0	0	0	0	0	0
Disability	1	1	2	0	0	0	4
Source of Income	1	2	0	0	0	0	3
Annual Total	**2**	**6**	**2**	**0**	**2**	**0**	**12**

Source: Fair Housing Center of Metropolitan Detroit, Email Correspondence May 9, 2022
Note: Totals may reflect more than one basis and thus do not always equal the total number of complaints.

TABLE 40: Fair Housing Complaints by Jurisdiction Reported by Fair Housing Center

Previously, the Livonia and Westland Housing Commissions have performed a public service function regarding fair housing law and practices - informing the public (including prospective renters) of rights and issues, and distributing literature, including Landlord/Tenant rights booklet. These identify and define the rights of both owners and renters in regard to rental laws in the community and in the State of Michigan. Housing Commission staff also assists individuals seeking housing in the community by providing the names and contact points for potential residency. Currently, this information is available through the city.

Staff in all three communities counsel individuals who may have been unlawfully discriminated against. If warranted staff advise landlords of their legal responsibilities and how to fulfill them. Moreover, they monitor rental practices under the Housing Choice Voucher Program and, if necessary, refer cases to the FHCMD.

OVERVIEW OF COMMUNITY INPUT

The study area jurisdictions worked together to gauge citizen input and to understand the needs of the community, especially those needs related to fair housing choice and fair housing challenges. This effort culminated in one public hearing on May 18, 2022 and a public survey.

PUBLIC INPUT

On May 18, 2022, Livonia, Redford Township, and Westland jointly hosted a public hearing to obtain views of citizens, public agencies, and other interested parties regarding the draft AI. There was limited turnout at this hearing and no public comments were received. Written comments were also requested by each of the three communities. None were received. Additionally, the three municipalities hosted a public survey on their websites. There were 47 responses.

FAIR HOUSING SURVEY RESULTS

As part of the Fair Housing initiative for the program year 2022-23, the City of Livonia, the Charter Township of Redford and the City of Westland hosted a fair housing survey on their websites for residents and other interested parties to complete and provide comment and opinion concerning fair housing issues. A total of 47 respondents completed the survey.

The survey began with questions pertaining to demographic information about the respondent. The survey asked respondents to identify their ethnic or cultural group. 12.8% identified as African American/Black, 83% identified as Anglo/White, 2% identified as Hispanic/Chicano/Latino, 2% identified as other. Of the respondents, 89% were not of a "protected class". The 10.6% who did identify as a protected class named disabled/handicapped, familial status, race, religion, and sex as the protected classes. The next question asked if you have a child under the age of 18 years of age, with 61.7% answering no, 38% answering yes.

The next questions asked the respondents about fair housing. First, respondents were asked to identify multiple options based on the following question: "Housing discrimination can occur if someone is denied housing or housing financing based on which of the following categories? (Check all that apply)". Respondents identified the following options: 87.2% - Age, 59.6% - Citizenship Status, 89.4% - Color, 91.5% - Disability/Handicap, 72.3% - Family Status, 68.1% - Level of Income, 83% - National Origin, 63.8% - Poor English Language Skills, 93.6% - Race, 87.2% - Religion, 85.1% - Sex, 80.9% - Sexual Orientation, 70.2% - Source of Income, 2% -Other (claiming that this is politically correct democrat dumbness). Next, respondents were asked, "How much do you know about Fair Housing Laws, including State of Michigan Fair Housing Law?" Only 10.6% of respondents were "very knowledgeable", while 34% were "not knowledgeable", and 55.3% were "somewhat knowledgeable".

Next, respondents were asked about housing discrimination. The first question asked if you or anyone you know has ever experienced housing discrimination. Of those who responded, 38.3% said," no", 19.1% said "yes, I have" and 10.6% said "yes, a person I know has". The next question asked, which of the following best describes the person or organization that discriminated against the person you know. Of those who responded, 2.1% named condominium or homeowner's association, 12.8% loan officer or mortgage broker, 8.5% municipal employee, 4.3% real estate professional, 25.5% rental property manager/owner, and 4.3% selected seller of a housing unit. 2.1% responded other noting that Holiday Park is not giving accommodations for disabled residents. The next question asked what best describes the location where the discrimination occurred. Of those who responded, 6.4% selected city office, 2.1% condominiums for sale, 4.3% individual housing unit for rent, 4.3% individual housing unit for sale, 6.4% lending institution, 4.3% public housing authority, 4.3% real estate office and 2.1% rental apartment complex, and 2.1% chose other and noted "co-op". The last question relating to housing discrimination asked what you believe was the basis for the discrimination you or the person you know experienced. Of those who responded, 4.3% chose age, 6.4% color, 4.3% disability/handicap, 6.4% family status, 12.8% level of income, 10.6% race, 2.1% religion, 4.3% sexual orientation, 8.5% source of income, while 4.3% said other naming "recently discharged military veteran" and "unmarried, engaged couple".

The next question asked related to what the respondent sees as the current impediments to fair housing choices. Of those who responded, 12.8% selected age, 27.7% color, 27.7% disability/handicap, 23.4% ethnicity, 12.8% family status, 38.3% insufficient income, 38.3% insufficient public transportation, 48.9% lack of sufficient affordable housing, 14.9% municipal codes, ordinances, or regulations, 17% national origin, 4.3% other, 29.8% race, 6.4% sex, 25.5% sexual orientation, and 4.3% said other (specifying "cash rich companies driving up prices to invest in real estate without adequate protections for homestead seekers").

The next few questions related to affordable housing and geographic areas. The first question asked respondents if they feel their housing choices are geographically limited to certain areas or neighborhoods. 42.6% said no and 57.4% said yes. The next question asked if they think affordable housing options are located throughout their city, or are they concentrated in certain areas/neighborhoods. 72.3% responded "concentrated in certain areas/neighborhoods" while 27.7% said affordable housing options are "spread throughout the city". Next, they were asked if they perceive certain geographic areas or neighborhoods within the city to be undesirable. 19.1% said no and 80.9%

said yes. The next question asked if they feel there is an adequate supply of affordable housing that is affordable to all residents. 70.2% said no and 29.8% said yes. The survey asked if they feel there is an adequate supply of affordable housing that is available to disabled residents. 74.5% said no and 25.5%said yes. Respondents were asked if they feel there is an adequate supply of affordable housing that is available to senior citizen residents. 61.7% said no and 38.3% said yes. The final affordable housing question asked if they feel there is an adequate supply of affordable housing that is available to residents with children 29.6% said no and 40.4% said yes.

The following question asks what the respondent would do or did do if they were discriminated against in housing choice. This was a question that asked them to check all that apply. Respondents identified the following: 21.3% - complain to the individual/organization that discriminated against me, 44.7% - contact a local fair housing organization, 19.1% - contact a private attorney, 17% - contact city offices, 25.5% - contact HUD, 19.1% -contact my elected municipal representative, 8.5% - contact the city attorney, 19.1% - contact the state attorney general, 29.8% - I wouldn't know what to do, 12.8% - nothing, and 2.1% - other (claiming Section 8 is the downfall of America).

The next few questions related to the perceptions of the community's respondents as to fair housing services and their awareness of such services. First question asked if they are familiar with the fair housing or social services provided by the city with 70.2% responding no and 29.8% saying yes. The next question asked if they have seen or heard information regarding the fair housing programs, laws, or enforcement. 74.5% said no and 25.5% said yes. The following question asked what information they have seen or heard and asked them to check all that apply. Of those who responded, 14.9% noted fair housing flyers or pamphlets, 8.5% fair housing handbook, 10.6% fair housing public service announcement on the radio, and 4.3% fair housing public service announcement on the television, and 4.3% chose other (claiming "comments during meetings" and "this is dumb"). The next question asked if they think that adequate fair housing information is available in other language translations with 51.1% responding no and 48.9% yes. Next respondents were asked in their opinion, how effective are the current fair housing laws, programs, and enforcement mechanisms. 38.3% said not effective, 51.1% said somewhat effective, and 10.6% said very effective. The last fair housing question asked the respondents what they feel would be the most effective ways to inform the residents about their fair housing rights and/or responsibilities and asked them to check all that apply. Respondents identified the following: 76.6% - fair housing literature/information in public libraries and city hall, 72.3% - information on the

city website, 44.7% - public meeting(s), 44.7% - radio advertisements/announcements, 51.1% -television advertisements/ announcements, and 14.9% - other. The respondents who specified other, had the following responses: "fair housing rights available through complexes, sellers, housing associations, real estate offices with the municipality", "mail information", "politically correct dumbness", "social media" 3 times, and "United States Postal Service".

A few observations may be drawn from the survey results. Overall, respondents to the survey believe that housing discrimination is most likely to be related to income and race/color and that discrimination is likely to occur in rental units. Respondents overwhelmingly believe that impediments to fair housing are likely to be based more on a lack of affordable housing choices, income (or lack thereof), and insufficient public transportation, then on traditional "protected classes". The survey also brings to light that respondents are not very familiar with the fair housing or social services provided by their city.

OTHER FACTORS AFFECTING FAIR HOUSING

One perceived impediment to fair housing is that steering along racial and ethnic lines is prominent in the real estate industry. This practice encourages non-minorities to look in new or recently established areas, and encourages lower-income persons and minorities to consider older and declining neighborhoods. If real, it would artificially stimulate sales of real estate, to the detriment of all concerned (by perpetuating segregation along racial and income lines), but particularly to lower-income and minority families, and to the older communities which would see a decline in public perception, property values, and could also experience a dramatic increase in the demands for services. It is therefore wise to test this perception.

The following factors were analyzed as potential factors that impact the availability and access of fair and equitable housing in the AI Study Area.

Master Planning and Zoning Ordinances

Municipalities, operating in a free economy, cannot direct the exact nature of development within their boundaries. They cannot, for example, direct developers to build specific types of units or developments, nor can they direct levels of amenities. They are more likely to exert an indirect influence over development by:

- establishing master plans, which contain elements of an envisioned planning future;

- developing and implementing zoning ordinances, which provide legal governance over the type and specific dimensions of development within areas of the community and then;

- monitoring development proposals which come their way for consistency with the plans and ordinances.

Although indirect, municipal development controls are considerable, and many communities have successfully used their police powers for the common good. Trouble can arise, however, depending on how the term "common good" is defined and applied. It is not always possible to meet all needs within any community, given the competing needs and desires of various residents and community interests, and sometimes choices are made, with the result that competing needs are met to varying degrees. Local zoning requirements can, for example, effectively exclude affordable housing for lower-income and minority families through minimum lot sizes or construction requirements. Zoning can also be used to prevent group quarters or community residences in certain neighborhoods. The same powers can also be used to focus on affordable housing to the exclusion of other interests, with the result that the community could become a lower-income enclave. Either approach can promote imbalanced development, to the detriment of citizens and business alike.

Therefore, it is important to evaluate these regulations. The purpose of this study is to determine whether there is fair housing in the City of Livonia, in Redford Township, and in the City of Westland. Given the existence of racial, ethnic and income imbalances across the country, it seems that the ideal of fair housing may not yet be attained. A review was made of local zoning ordinances, as shown in the **Table 41**, to determine the role municipal governments play in unfair housing practices.

TABLE 41: COMPARISON OF RESIDENTIAL ZONING REQUIREMENTS OF AI JURISDICTIONS

MUNICIPALITY	Minimum Lot Size (square ft)	Comments
Livonia	N1 – 6,000	Neighborhood District 1.
	N2 – 8,400	Neighborhood District 2.
	RUF – 15,000	Rural Urban Farm District.
	NM1	Neighborhood Multifamily District 1. Buildings shall not exceed 35 feet in height (2.5 stories).
	NM2	Neighborhood Multifamily District 2. Buildings shall not exceed 4 stories in height, except those in Zone I, Zone II, Zone III (6 stories, 8 stories, 12 stories, respectively).
	NM3	Neighborhood Multifamily District 3. Buildings shall not exceed 35 feet in height (2.5 stories), except those in Zone I, Zone II, and Zone III (4 stories, 6 stories, and 9 stories, respectively).
Redford	R-1 – 6,000	One-Family Residential District.
	R-2 – 6,000	Two-Family Residential District.
	R-3	Multiple-Family Residential District. 1 Bedroom: minimum lot size 2,500 square feet. 2 Bedroom: minimum lot size 3,000 square feet. 3 Bedroom: minimum lot size 3,500 square feet.
	MH – 5,000	Mobile Home Park District.
Westland	R-1 – 9,600	Single-Family Residential District.
	R-2 – 8,400	Single-Family Residential District.
	R-3	Single-Family Residential District. Reserved for future use.
	R-4	Single-Family Residential District. Reserved for future use.
	R-5 – 7,200	Single-Family Residential District.
	R-6 – 8,400	Two-Family Residential District.
	THR – 80,000	Townhouse Residential District.

	GAR – 80,000	Garden Apartment Residential District.
	MRR – 80,000	Mid-Rise Residential District.
	MHR	Mobile Home Residential District. Regulations for the MHR mobile home residential district shall be the same as in the Michigan Mobile Home Commission Rules as adopted and amended by the Michigan Mobile Home Commission.

Sources: City of Livonia, Redford Township, & Westland Zoning Ordinances

TABLE 41: Comparison of Residential Zoning Requirements of AI Jurisdictions

All three zoning ordinances provide, as a matter of policy, for the maintenance and preservation of existing housing. Given the long period of development, these ordinances were changed to reflect construction styles and trends. They therefore accommodate smaller homes and lot sizes, larger units, and multiple dwelling units of various sizes and types. The newer homes are more typical of Livonia, and are, by definition, more expensive. Livonia's zoning ordinance reflects the desire to allow a variety of housing developments, with six, fairly broad, zoning classifications. Redford's allows four, and Westland allows eight active residential zoning classifications.

The communities, in conformance with their zoning ordinances, have actively promoted housing maintenance and rehabilitation programs for neighborhood residents, along with a variety of human service programs designed to meet identified needs of each neighborhood. These neighborhoods can and do provide significant opportunities for affordable housing among lower-income families. The lot sizes are reasonable in terms of overall size and are not exclusionary. These practices have resulted in the development of affordable housing in both communities.

The existence of affordable housing opportunities does, however, not always translate into equal housing for racial and ethnic minorities. The **Black/African American Populations Map**, the **Hispanic and Latinx Populations Map**, and the **Minority Race Map** show which block groups within the study area have higher percentages of minorities as opposed to others. These maps provide a visual representation of the geographic concentrations of minority populations and may also indicate areas where affordable housing may be concentrated.

The AI Study Area is largely built out. It will, without major and expensive redevelopment projects, be difficult to provide new housing opportunities in significant numbers. This aligns with the fairly stagnant population, and mild housing unit increases.

Each community has shown sound, flexible, responsive, and non-exclusionary zoning policies that promote construction of reasonably prices homes and apartments.

In Livonia, home and lot sizes appear to have continually increased over the past 35 years, and new homes are larger than those built even 20 years ago. Considering the land and development premiums paid by developers and, ultimately, homebuyers, it is difficult for a developer of affordable housing in these areas to compete with developers doing more profitable, i.e., higher cost, projects. This compounds the difficulty of providing affordable housing. However, the city's refined zoning ordinance and general approach to residential zoning is a broad-strokes effort to encourage the development of inclusive housing, diverse housing, and affordable housing.

Redford generally has smaller lot sizes for its single-family units than both Livonia and Westland. Due to the age and build-out state of each community, in-fill development and rehabilitation of housing has been and should continue to be priorities.

The three communities have allowed for increased densities through smaller lot size, through attached single-family housing and town-home development and, in the case of Redford Township and Westland, through established mobile home parks. This has provided opportunity for affordable housing to persons at all income levels. The implementation of fair housing practices in the sale and rental of homes and apartments, moreover, has ensured an increasing representation of minority households in all three communities.

To summarize, the housing patterns in the study area are affected by a number of complex economic and sociological factors. They affect virtually every aspect of life, from fair and affordable housing to education, employment, and public services. The AI Study Area, as a result, faces complex challenges which defy easy resolution and present difficult political and policy choices. The decisions made will affect living patterns and the quality of life far into the future.

The combination of a recent regional (and national) economic downturn due to the COVID-19 pandemic, 2020 saw a significant decline in the production of new units. The pandemic impacted the construction of new residential units in the AI Study Area. But since 2021, with the recent economic turnaround, each of the three AI communities has seen building permit activity pick up and are likely to continue to see permit activity increase due to the increasing demand for housing choice.

TABLE 42: BUILDING PERMITS BY COMMUNITY 2016-2022

Jurisdiction	2016	2017	2018	2019	2020	2021	2022	TOTAL
Livonia	26	65	122	237	53	92	3	598
Redford	23	26	9	0	4	10	0	72
Westland	38	56	60	38	76	82	N/A	350

Source: SEMCOG 2022

TABLE 42: Building Permits by Community, 2016-2022

Table 42 provides the net total of residential building permits counts for each of the communities. This table shows that each community experienced a fairly steady level of in residential building permit activity beginning in 2016, with Redford having the least number of new building permits with 72 and Livonia experiencing the most new building permits (598).

Insurance

Homeowners and, to a lesser extent, automobile insurance may not readily come to mind when discussing fair housing, but the ability to obtain the former is critical and the ability to obtain the latter is important for individuals seeking housing. High insurance rates, or the inability to obtain insurance at all, can dissuade resident households to move from, and potential buyers seeking housing, certain designated neighborhoods. In the past, insurance companies, like realtors and mortgage companies, have been charged with arbitrarily charging higher premiums or refusing to insure at all, in designated areas. This practice is termed redlining, and it is illegal.

The practice of redlining may no longer be legal or even prevalent within the industry, but the fact that families in some localities, or in certain zip code areas, may pay more, or may find it difficult to obtain homeowners or car insurance, could be powerful economic disincentives to equal housing. The industry has taken steps, e.g., making a general charge to cover costs for high-risk individuals or areas, as a way

of providing coverage despite potentially higher claim costs. This is a very difficult issue to address, given differing crime and accident patterns in different communities and neighborhoods.

There are other emerging issues which may affect the ability of lower income and minority households to obtain insurance in the future. Lead-related hazards, for example, has received increased public, legislative, and regulatory attention over the last decade. All sellers of real estate must now notify purchasers of known hazards. The Lead Safe Housing Rule requires that lead hazards be identified and corrected in homes rehabilitated with CDBG and other Federal housing funds. It is possible that the scope of covered properties will expand to all residential properties, not just those receiving some form of Federal assistance. It is also likely that lead and other known toxins will affect insurers and the insurance underwriting process in the future.

Lower income households, particularly lower-income minority households, tend to inhabit a disproportional share of the older and substandard housing that is likely to contain lead. They are therefore at a greater risk than other elements of the population to the adverse effects of lead. They could bear a disproportionate share of the financial burden should insurers alter their underwriting requirements to reflect the new requirements.

Educational Policies and Practices

Schools are extremely important to many families considering the purchase of a home, particularly those with children. The common wisdom is that some schools are better than others. Consequently home-buyers who make informed decisions will compare schools, and school districts, before making their selection of housing. This is natural. Too often, however, schools with a large proportion of racial and ethnic minorities are shunned by middle-income homebuyers, often because they are perceived as being substandard or unsafe. This promotes, and results in, the continuing segregation of neighborhoods. Poor school performance, or the perception thereof, can therefore be an impediment to fair housing.

The City of Livonia is served by two school districts, Clarenceville and Livonia Public Schools. Redford Township is served primarily by two districts, South Redford, and Redford Union Public Schools. The City of Westland is served primarily by two school districts, Wayne Westland Community Schools and Livonia

Public Schools. In order to compare school performance, we compared data for each of the six school districts.

The Livonia district is much larger than the other districts, about 5 times larger than both Redford Union and South Redford, and somewhat larger than Wayne-Westland. Clarenceville is by far the smallest school district of the six and actually serves both Wayne and Oakland counties. The size of the school district is unlikely to have any bearing on the quality of education found, however there are other differences that likely do impact the quality of education. **Table 43** shows that, with the exception of Wayne-Westland, all school districts within the study area have similar average student-teacher ratio (number of students for every one teacher) as the state average (18:1 state average). Another indicator displayed in **Table 43** is the percent of students who are eligible for reduced lunch in each school district. While Livonia School District was far below the state average (33% of students in Livonia are eligible for reduced lunch, compared to the state average of 42%), Redford Union, South Redford, Clarenceville, and Wayne-Westland had a significantly higher percent of students eligible for reduced lunch (76%, 67%, 63%, and 53%, respectfully).

TABLE 43: COMPARISON OF GENERAL STATISTICS OF STUDY AREA SCHOOLS

District	District Serves	Total Student Population	Student Teacher Ratio	Students from Low-Income Families
Clarenceville	Livonia	1,857	22:1	63%
Livonia	Livonia	14,077	15:1	33%
Redford Union	Redford	2,392	17:1	76%
South Redford	Redford	3,238	19:1	67%
Wayne-Westland	Westland	10,863	33:1	56%

Source: Greatschools.org; Accessed April 2022

TABLE 43: Comparison of General Statistics of Study Area Schools

A look at other performance characteristics may shine more light on district achievement differences. When comparing district performance measures, Livonia is the only school district that consistently out-performs the state average for M-STEP tests. The M-STEP (Michigan Student Test of Educational Progress) is a standardized test taken by all public schools in Michigan. Redford Union, South Redford, Clarenceville, and Wayne-Westland all performed below the state averages for the M-STEP.

This relatively significant difference in academic performance may suggest that there is a material difference to be found in the number and type of specialized class offerings within more affluent school districts. Additionally, the variations in performance levels between school districts might also be because academic performance is related to the number of students who aspire to and attain higher education. **Table 44** details educational attainment for the AI Study Area. Residents in Livonia have the highest percentages of individuals that have a bachelor's degree or higher, when compared to Redford Township and Westland.

TABLE 44: HIGHEST LEVEL OF EDUCATION

Educational Attainment	Livonia	Redford	Westland
Graduate/Masters+	12.5%	6.5%	7.5%
Bachelor's Degree	24.9%	16.6%	15.3%
Associate Degree	11.4%	11.0%	9.9%
Some College, No Degree	23.8%	24.8%	26.9%
High School Graduate	21.8%	32.5%	30.6%
Did Not Graduate High School	5.5%	8.4%	9.9%

Source: U.S. Census Bureau, 2016-2020 American Community Survey (ACS) 5-Year Estimates
Universe: Population 25 years and older

TABLE 44: Highest Level of Education

A wealthier district, according to this view, would be able to offer a larger number and variety of advanced placement courses than one with fewer financial resources, which may propel students to higher education paths. They may also be able to offer more special extra-curricular activities.

It would be likely to assume that those from wealthier districts still have an advantage over their less affluent counterparts. This could explain the difference in scores of the MEAP and other standardized test scores, and the alignment of higher educational attainment and higher median household income. This would likely make a significant difference in educational opportunity between school districts, and would strengthen the desire of wealthier families to purchase housing in the more affluent districts. This would, in turn continue to bolster the resources of an affluent area and further strengthen patterns of segregation by race and income throughout the community and, significantly throughout the Metro-Detroit region.

It is important to note that the aggregated data do not distinguish between the levels of educational performance between neighborhoods within and between districts. Obtaining such data was beyond the scope of this study.

There may be an opportunity for communities tagged as being "lower-income", "minority" and "under-performing" to do better, through a careful evaluation of performance criteria. This could provide insight for school systems to refine their approach to enhance overall student achievement levels. If, for example, the number and type of advanced placement courses were expanded, or if magnet or enrichment programs were introduced, they might be able to offer college-bound students more in-depth instruction and opportunities for specialized learning. This could also be used to attract students who might otherwise locate outside of the district. Such courses could also be used to help inspire other students who might otherwise not perform as well. However, these improvements depend on the availability of resources for the district, which is certainly influenced by the size of the population and the quality/availability of housing in the jurisdiction.

It would appear, from the above, that there are objective performance factors which affect public attitudes concerning educational quality in our communities. There is, however, the possibility that unspoken fears and prejudices would govern choice even if all other factors were equal. It is difficult, however, to gain empirical data concerning whether and how unspoken public attitudes or fears drive housing market choices regardless of other factual considerations.

FAIR HOUSING IMPEDIMENTS AND CHALLENGES

While most of the general demographics provided for the AI Study Area 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 study area indicates challenges in breaking down racial and social 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.

The U.S. Department of Housing and Urban Development requires an identification of the fair housing challenges facing the municipalities. To accomplish this task, identification of recommendations was based on the intersection of the data collected for the plan, the information gathered during the public meetings, 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 created. Consideration was given to certain constraints and/or realities facing the communities, 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.

Findings

Impediments & Recommendations

STATEMENT OF ISSUES

Over the past 20 to 30 years, many segments of the population, principally highly educated professionals and high-tech workers, prospered, while others, primarily those with less education, lower skill levels, and some workers in manufacturing fell further behind. The economy is beginning to provide replacement jobs in the service sector, but many of these pay a lower wage than the lost jobs in manufacturing. In Southeast Michigan it is fair to assume that at least some of those displaced by economic restructuring have lost ground.

Over the last decade, housing opportunities for minorities have increased within the Livonia, Redford Township, and Westland. As more and more minorities live in middle- and upper-income neighborhoods in these communities, the relationship between race, income and housing needs within each community becomes less compelling.

This is encouraging for the residents of all three communities since income and, presumably, housing conditions for minorities appear to be coming in line with those for the population as a whole. These circumstances are radically different from what was experienced in the past. This does not imply that racial- and ethnic-prejudice, and the tools used to enforce them, no longer exist, as it is clear from the results of the survey that socio-economic, political, and racial biases still exist. It may be that they are fading as more minorities succeed and are able to command the same privileges as non-minority populations. It may be as appropriate to address the causes of poverty and to address issues concerning gaining access to decent jobs (e.g., job skills, work attitudes, education, transportation, housing close to major employment centers etc.), as it is to focus on overtly discriminatory practices which have kept minorities from equal housing opportunities in the past.

In order for communities to function well, there must be an adequate supply of housing in proximity to employment, public transportation, and community facilities. The housing stock must include affordable

and accessible for sale and rental units, not only to meet social equity goals, but in order to ensure community viability. The development of a diverse and affordable housing stock must be carried out without sacrificing sound regulations that are in place to protect the environment and public health and safety.

Fair and affordable housing issues transcend jurisdictional boundaries. Communities need to forge cross-jurisdictional partnerships to develop coherent long-term local housing policies that support a shared vision for housing and community development for the entire region. Coalition building, working toward consensus, and coordinating housing programs and resources are key tools and building blocks to addressing a multitude of housing issues. This Joint Analysis of Impediments to Fair Housing is an important step in analyzing housing related needs and issues that go beyond the boundaries of a single community. Through the partnership and shared vision of the three communities involved in this AI it is hoped that the shared impediments to fair housing can be addressed through shared solutions.

IMPEDIMENTS & RECOMMENDATIONS

Impediment to Fair Housing #1: Public Perception of Exclusivity

The public perception both within and beyond the AI Study Area is that the City of Livonia is exclusive and does not welcome minority households – especially as compared to either Redford Township or Westland.

Recommendation:

It is suggested that to counter this perception of exclusivity each municipality should actively pursue an educational campaign. Additionally, it is presumed that this perception has begun to change over the last couple of years as more minority households have taken up residence. Despite this, Livonia, Redford and Westland could provide more educational opportunities that promote the community as inclusive and conduct outreach to minority and other disadvantaged residents.

Impediment to Fair Housing #2: Insufficient Housing for Special Needs Populations

There are a number of households which have members with special needs, particularly among the frail elderly and those who need assistance to conduct one or more of life's daily essential tasks. These individuals and households need additional assistance.

Recommendation:

Continue, if feasible, the development and implementation of programs designed to address the needs of special needs populations. For example, the Westland Housing Commission has combined Housing Choice Vouchers with Medicaid Waivers to house the frail elderly in an independent living environment for longer than what might otherwise be possible. Initiatives like this, as well as working to provide transitional housing assistance to homeless veterans with HOME and Section 8 assistance are encouraging. However, with each community, and the region as a whole, expected to significantly age (i.e. by 2045 more than one in five residents in the AI Study Area will be over the age of 65) each community will need to take additional and perhaps more drastic initiatives to provide the required services and housing choices for this growing population.

Impediment to Fair Housing #3: Lack of Affordable Housing not in need of Rehabilitation

Since low- and moderate-income populations have fewer options for decent affordable housing through their personal resources, they may be forced to live in inaccessible units, or old and unsafe units in order to maximize resources. The lack of new/recently renovated affordable housing is therefore an impediment to fair housing.

Recommendation:

All three communities should work with housing providers to ensure the offering of suitable and affordable housing as well as housing rehabilitation and lead abatement programs. The City of Livonia's Major Home Rehabilitation Loan program is an examples of allocating resources to improve the availability of decent, affordable housing. This should also be coupled with an educational campaign to make residents aware of these programs.

Impediment to Fair Housing #4: Perceived School System Competitiveness

Although beyond the scope of the AI, public perception of school performance informs housing choice, which affects social, income, and demographic patterns. When this occurs, minorities and lower-income persons tend to be hurt because they tend to be less able to afford the choices made by others. This can result in minorities and lower-income households living in segregated and inferior communities. Such an occurrence is an impediment to fair housing.

Recommendation:

This impediment is similar in scope to Impediment #1 – public perception of exclusivity. As it relates to the school systems, Redford Township and Westland are perceived as less competitive than Livonia. It is suggested that to counter this perception of competitiveness the communities could actively pursue an educational campaign.

Impediment to Fair Housing #5: Insufficient Number of Rental Housing for Large Families

There are few rental units (three or more bedroom), which are capable of housing large families. This condition may inhibit large families from finding affordable housing in the AI Study Area, especially in Livonia and Redford Township. Only the City of Westland provides subsidized housing units with three bedrooms or greater.

Recommendation:

The construction of rental housing is largely the domain of private developers, over which the communities have little if any direct control. If possible, the communities should consider offering incentives, e.g., HOME funding, to developers who construct larger rental units, to encourage their development.

Impediment to Fair Housing #6: Disparate Mortgage Lending and Home Improvement Loan Rates

The preceding analysis indicates that minorities, especially Black and Hispanic families, tend to experience higher loan denial rates than Whites in metropolitan Detroit. The data is too broad to draw specific conclusions regarding lending practices in the region, let alone the three communities in the AI Study Area, but the fact that disparate lending occurs among disadvantaged and minority populations is significant, even if the reasons are related to the applicant's failure to meet standard underwriting criteria. Any increase in loan approval rates among minority applicants would improve their ability to obtain decent and affordable housing. More families would be able to purchase housing and more would be able to improve both their physical environment through improvement loans, and their financial situation, through refinancing. This is especially true in a time of unprecedented low mortgage rates. Although this is a fundamental issue affecting the entire nation, there are possible remedies within each of the cities' control.

Recommendation:

The three communities should continue and, if possible, expand their homebuyer counseling, down payment assistance, and credit counseling to individuals and families, as part of its housing programs. They may also provide post-purchase counseling to those who have purchased housing already.

Impediment to Fair Housing #7: Difficulty in Qualifying for Loans

Given that poor credit history appears to be a major reason for loan denial, it would appear that financial counseling could assist lower-income families become more successful in acquiring Federally-insured mortgage assistance.

Recommendation:

All three communities already have homeownership classes underway. However, each community could consider expanding or continuing the required pre-purchase housing counseling. Additionally, each communities could consider utilizing funding for down payment assistance programs.

Impediment to Fair Housing #8: Fair housing education, awareness, and information within the public sector and the private sector

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

Recommendation:

All three communities 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.

Each community should request and use HUD Technical Assistance in implementing strategies to further fair housing

Appendix

1. Approvals

2. Public Participation

3. Survey Results

4. Maps

Signature Page

The City of Livonia, Charter Township of Redford, and City of Westland have completed this Analysis of Impediments to Fair Housing Choice as part of our efforts to affirmatively further fair housing choice.

_____   _____

Maureen Miller Brosnan, Mayor   Date

City of Livonia, MI

_____   _____

Pat McRae, Township Supervisor   Date

Charter Township of Redford, MI

_____   _____

Michael Londeau, Mayor   Date

City of Westland, MI

Public Participation

Survey Results

Fair Housing Survey 2022 Results

Are you a resident of:
47 of 47 Answered (100.0%)

Livonia	0 responses	0.0%
Redford Township	0 responses	0.0%
Westland	47 responses	100.0%

Which ethnic or cultural group are you considered a member?
47 of 47 Answered (100.0%)

African American/Black	6 responses	12.8%
American Indian/Native American	0 responses	0.0%
Anglo/White	39 responses	83.0%
Asian/Oriental/Pacific Island	0 responses	0.0%
Hispanic/Chicano/Latino	1 response	2.1%
Multi-racial	0 responses	0.0%
Other	1 response	2.1%

Do you, or someone in your household, qualify as a "protected class"?
47 of 47 Answered (100.0%)

No	42 responses	89.4%
Yes	5 responses	10.6%

To which protected class do you/your household belong? (check all that apply)
5 of 47 Answered (10.6%)

Color	0 responses	0.0%
Disabled/Handicapped	3 responses	6.4%
Familial Status (family with one or more persons under 18 years of age)	2 responses	4.3%
National Origin	0 responses	0.0%
Race	1 response	2.1%
Religion	2 responses	4.3%
Sex	1 response	2.1%

Do you have children under the age of 18 years?
47 of 47 Answered (100.0%)

No	29 responses	61.7%
Yes	18 responses	38.3%

Housing discrimination can occur if someone is denied housing or housing financing based on which of the following categories? (check all that apply)
47 of 47 Answered (100.0%)

Age	41 responses	87.2%
Citizenship Status	28 responses	59.6%
Color	42 responses	89.4%
Disability/Handicap	43 responses	91.5%
Family Status (family with one or more persons under 18 years of age)	34 responses	72.3%

Level of Income	32 responses	68.1%
National Origin	39 responses	83.0%
Other	1 response	2.1%
Poor English Language Skills	30 responses	63.8%
Race	44 responses	93.6%
Religion	41 responses	87.2%
Sex	40 responses	85.1%
Sexual Orientation	38 responses	80.9%
Source of Income (public assistance)	33 responses	70.2%

Other (please list)
1 of 47 Answered (2.1%)
· this is politically correct democrat dumbness

How much do you know about Fair Housing Laws, including State of Michigan Fair Housing Law?
47 of 47 Answered (100.0%)

Not Knowledgeable	16 responses	34.0%
Somewhat Knowledgeable	26 responses	55.3%
Very Knowledgeable	5 responses	10.6%

Have you or anyone you know ever experienced housing discrimination?
31 of 47 Answered (66.0%)

No	18 responses	38.3%
Yes, a person I know has	5 responses	10.6%
Yes, I have	9 responses	19.1%

Which of the following best describes the person or organization that discriminated against you or the person you know?
15 of 47 Answered (31.9%)

Condominium or homeowner's association	1 response	2.1%
Loan officer or mortgage broker	6 responses	12.8%
Municipal employee	4 responses	8.5%
Other	0 responses	0.0%
Real estate professional	2 responses	4.3%
Rental property manager/owner	12 responses	25.5%
Seller of a housing unit	2 responses	4.3%

Other (please list)
1 of 47 Answered (2.1%)
· Holiday Park - Not giving accommodations for disabled residents

What best describes the location where the discrimination occurred?
15 of 47 Answered (31.9%)

City Office	3 responses	6.4%
Condominiums for sale	1 response	2.1%
Individual housing unit for rent	2 responses	4.3%

Individual housing unit for sale	2 responses	4.3%
Lending institution	3 responses	6.4%
Other	0 responses	0.0%
Public Housing Authority	2 responses	4.3%
Real Estate Office	2 responses	4.3%
Rental apartment complex	11 responses	23.4%

Other (please list)
1 of 47 Answered (2.1%)
· Co-op

What do you believe was the basis for the discrimination you or the person you know experienced?
14 of 47 Answered (29.8%)

Age	2 responses	4.3%
Citizenship Status	0 responses	0.0%
Color	3 responses	6.4%
Disability/Handicap	2 responses	4.3%
Family Status (family with on or more persons under 18 years of age)	3 responses	6.4%
Level of Income	6 responses	12.8%
National Origin	0 responses	0.0%
Other	2 responses	4.3%
Poor English Language Skills	0 responses	0.0%
Race	5 responses	10.6%
Religion	1 response	2.1%
Sex	0 responses	0.0%
Sexual Orientation	2 responses	4.3%
Source of Income (public assistance)	4 responses	8.5%

Other (please list)
2 of 47 Answered (4.3%)
· Recently discharged military veteran.
· Unmarried, engaged couple

What do you see as current impediments to fair housing choices?
31 of 47 Answered (66.0%)

Age	6 responses	12.8%
Color	13 responses	27.7%
Disability/Handicap	13 responses	27.7%
Ethnicity	11 responses	23.4%
Family Status	6 responses	12.8%
Insufficient Income	18 responses	38.3%
Insufficient public transportation	18 responses	38.3%
Lack of sufficient affordable housing	23 responses	48.9%)
Municipal codes, ordinances, or	7 responses	14.9%

regulations		
National Origin	8 responses	17.0%
Other	2 responses	4.3%
Race	14 responses	29.8%
Sex	3 responses	6.4%
Sexual Orientation	12 responses	25.5%

Other (please list)
2 of 47 Answered (4.3%)
· Cash rich companies driving up prices to invest in real estate without adequate protections for homestead seekers.
· stop catering to welfare whores

Do you feel your housing choices are geographically limited to certain areas or neighborhoods?
47 of 47 Answered (100.0%)

No	20 responses	42.6%
Yes	27 responses	57.4%

Do you think affordable housing options are located throughout your city, or are they concentrated in certain areas/neighborhoods?
47 of 47 Answered (100.0%)

Concentrated in certain areas/neighborhoods	34 responses	72.3%
Spread throughout the city	13 responses	27.7%

Do you perceive certain geographic areas or neighborhoods with our city to be undesirable?
47 of 47 Answered (100.0%)

No	9 responses	19.1%
Yes	38 responses	80.9%

Do you feel that there is an adequate supply of affordable housing that is available to all residents?
47 of 47 Answered (100.0%)

No	33 responses	70.2%
Yes	14 responses	29.8%

Do you feel that there is an adequate supply of affordable housing that is available to disabled residents?
47 of 47 Answered (100.0%)

No	35 responses	74.5%
Yes	12 responses	25.5%

Do you feel that there is an adequate supply of affordable housing that is available to senior citizen residents?
47 of 47 Answered (100.0%)

No	29 responses	61.7%
Yes	18 responses	38.3%

Fair Housing Survey 2022 Results

Do you feel that there is an adequate supply of affordable housing that is available to residents with children?
47 of 47 Answered (100.0%)

No	28 responses	59.6%
Yes	19 responses	40.4%

What would you do, or did you do, if you were discriminated against in housing choice? (check all that apply)
47 of 47 Answered (100.0%)

Complain to the individual/organization that discriminated against me	10 responses	21.3%
Contact a local fair housing organization	21 responses	44.7%
Contact a private attorney	9 responses	19.1%
Contact City offices	8 responses	17.0%
Contact HUD	12 responses	25.5%
Contact my elected municipal representative	9 responses	19.1%
Contact the City Attorney	4 responses	8.5%
Contact the State Attorney General	9 responses	19.1%
I wouldn't know what to do	14 responses	29.8%
Nothing	6 responses	12.8%
Other	1 response	2.1%

Other (please identify)
1 of 47 Answered (2.1%)

· Section 8 is the downfall of America

Are you familiar with the fair housing or social services provided by our city?
47 of 47 Answered (100.0%)

No	33 responses	70.2%
Yes	14 responses	29.8%

Have you seen or heard information regarding the fair housing programs, laws, or enforcement?
47 of 47 Answered (100.0%)

No	35 responses	74.5%
Yes	12 responses	25.5%

What information have you seen/heard? (check all that apply)
12 of 47 Answered (25.5%)

Fair housing flyers or pamphlets	7 responses	14.9%
Fair housing handbook	4 responses	8.5%
Fair housing public service announcement on the radio	5 responses	10.6%
Fair housing public service	2 responses	4.3%)

announcement on the television		
Other	2 responses	4.3%

Other (please list)
2 of 47 Answered (4.3%)
· Comments during meetings.
· this is dumb

Do you think that adequate fair housing information is available in other language translations?
47 of 47 Answered (100.0%)

No	24 responses	51.1%
Yes	23 responses	48.9%

In your opinion, how effective are the current fair housing laws, programs, and enforcement mechanisms?
47 of 47 Answered (100.0%)

Not Effective	18 responses	38.3%
Somewhat Effective	24 responses	51.1%
Very Effective	5 responses	10.6%

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)
47 of 47 Answered (100.0%)

Fair housing literature/information in public libraries and City Hall	36 responses	76.6%
Information on the City website	34 responses	72.3%
Other	7 responses	14.9%
Public Meeting(s)	21 responses	44.7%
Radio advertisements/announcements	21 responses	44.7%
Television advertisements/announcements	24 responses	51.1%

Other (please describe)
7 of 47 Answered (14.9%)
· Fair housing rights available through complexes, sellers, housing associations, real estate offices within the municipality.
· Mail information
· politically correct dumbness
· Social Media
· social media
· Social media
· United States postal service

Maps

2022

Analysis of Impediments to Fair Housing Choice

Study Area Map

Oakland County

Northville

City of Livonia

Detroit

5

Plymouth Township

Redford Township

96

Plymouth
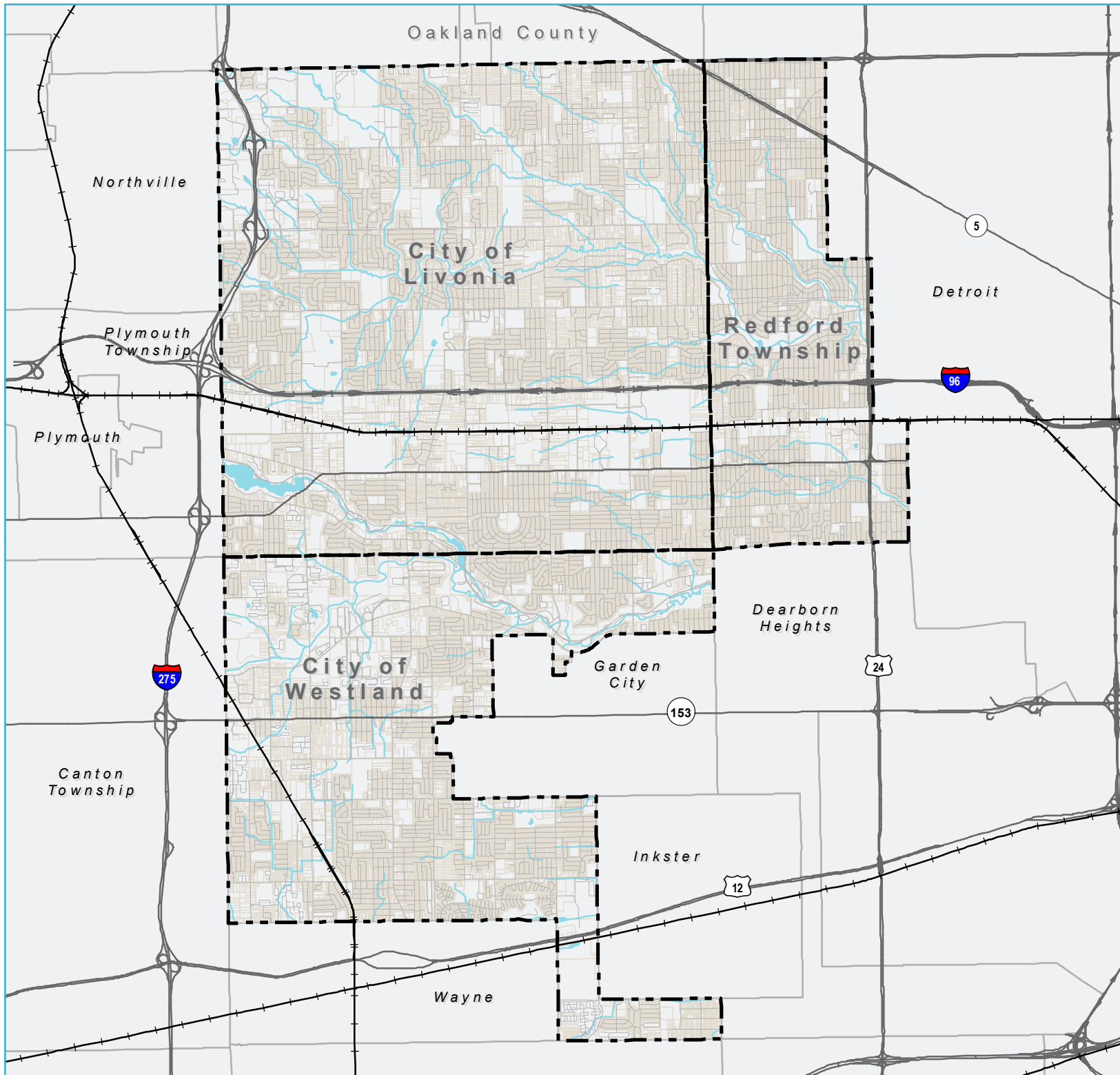
Study Area

Parcels

Base Data

Municipal Boundaries (AI Study Area)

Water

Roads

Railroads

Dearborn Heights

275

City of Westland

Garden City

24

153

Canton Township

Inkster

12

Wayne

Source: Michigan Open Data; Wayne County

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2022

Analysis of Impediments to Fair Housing Choice

Low- and Moderate-Income Populations Map

Oakland County

Northville

Plymouth Township

Plymouth

Detroit

Canton Township

Garden City

Dearborn Heights

Inkster

Wayne

Low- and Moderate-Income Block Groups
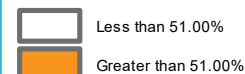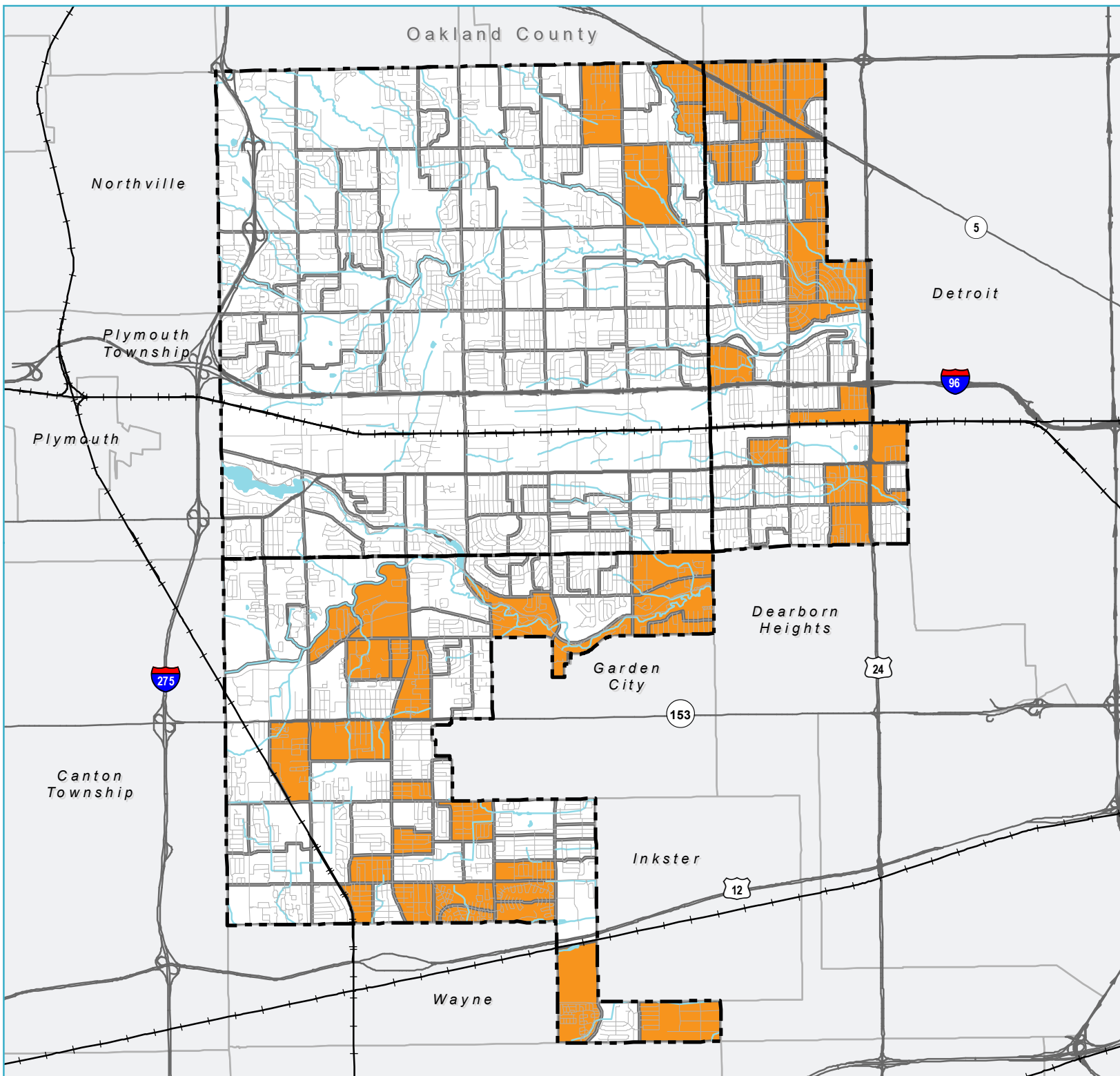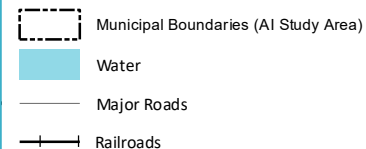
- Less than 51.00%
- Greater than 51.00%

Base Data

- Municipal Boundaries (AI Study Area)
- Water
- Major Roads
- Railroads

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2022

Analysis of Impediments to Fair Housing Choice

Populations Under Age 18 Map

Percent Population Under 18 by Block Groups
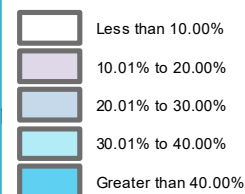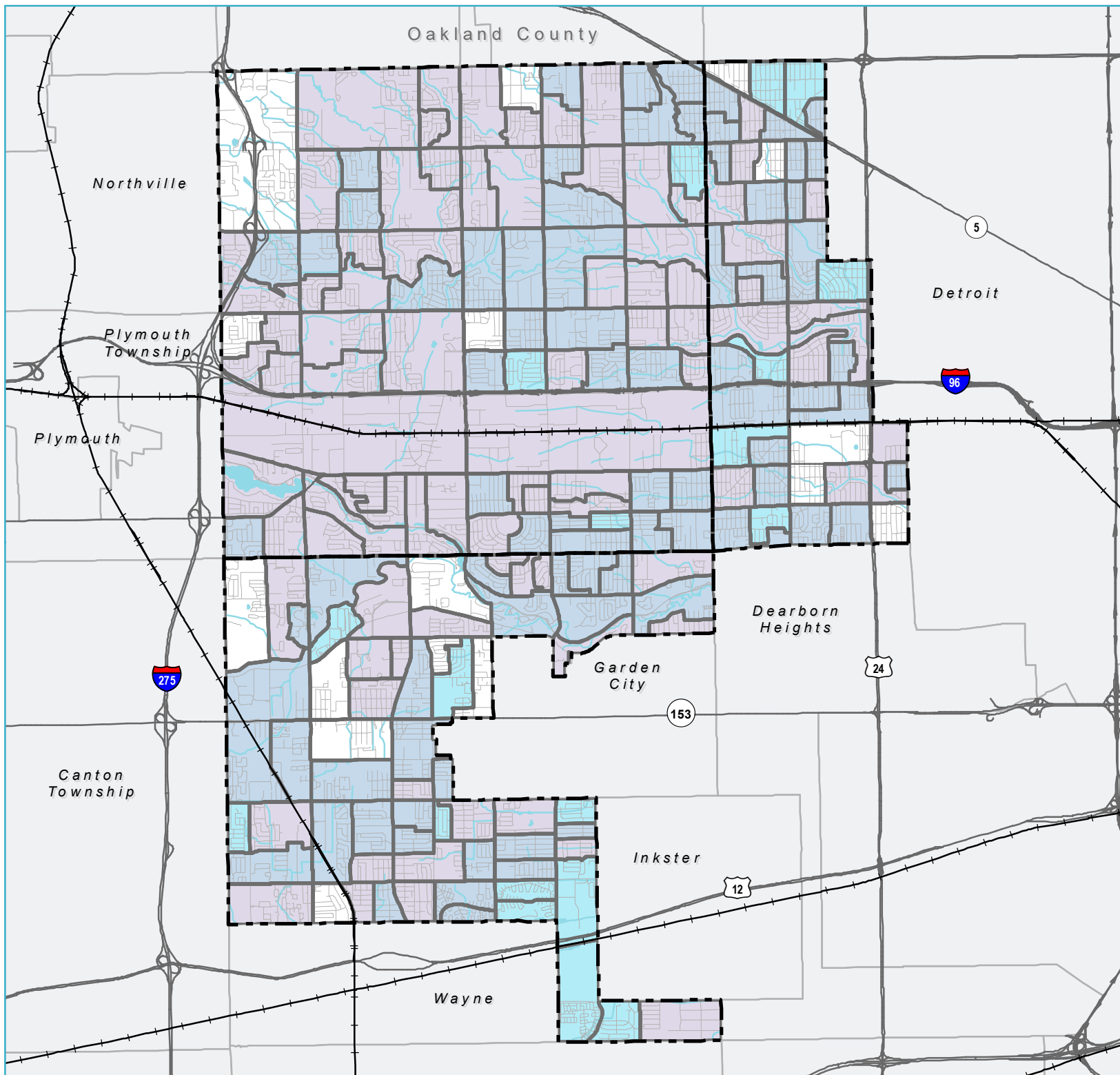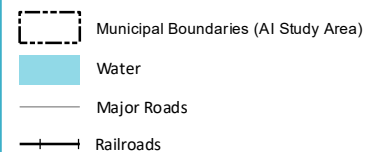
- Less than 10.00%
- 10.01% to 20.00%
- 20.01% to 30.00%
- 30.01% to 40.00%
- Greater than 40.00%

Base Data

- Municipal Boundaries (AI Study Area)
- Water
- Major Roads
- Railroads

Source: TIGER/Line Data; Michigan Open Data;
2016-2020 American Community Survey 5-Year Estimates;
2015-2019 American Community Survey 5-Year Estimates.

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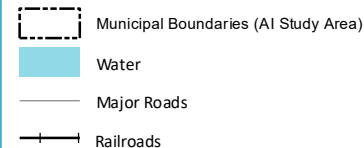Suite 2500
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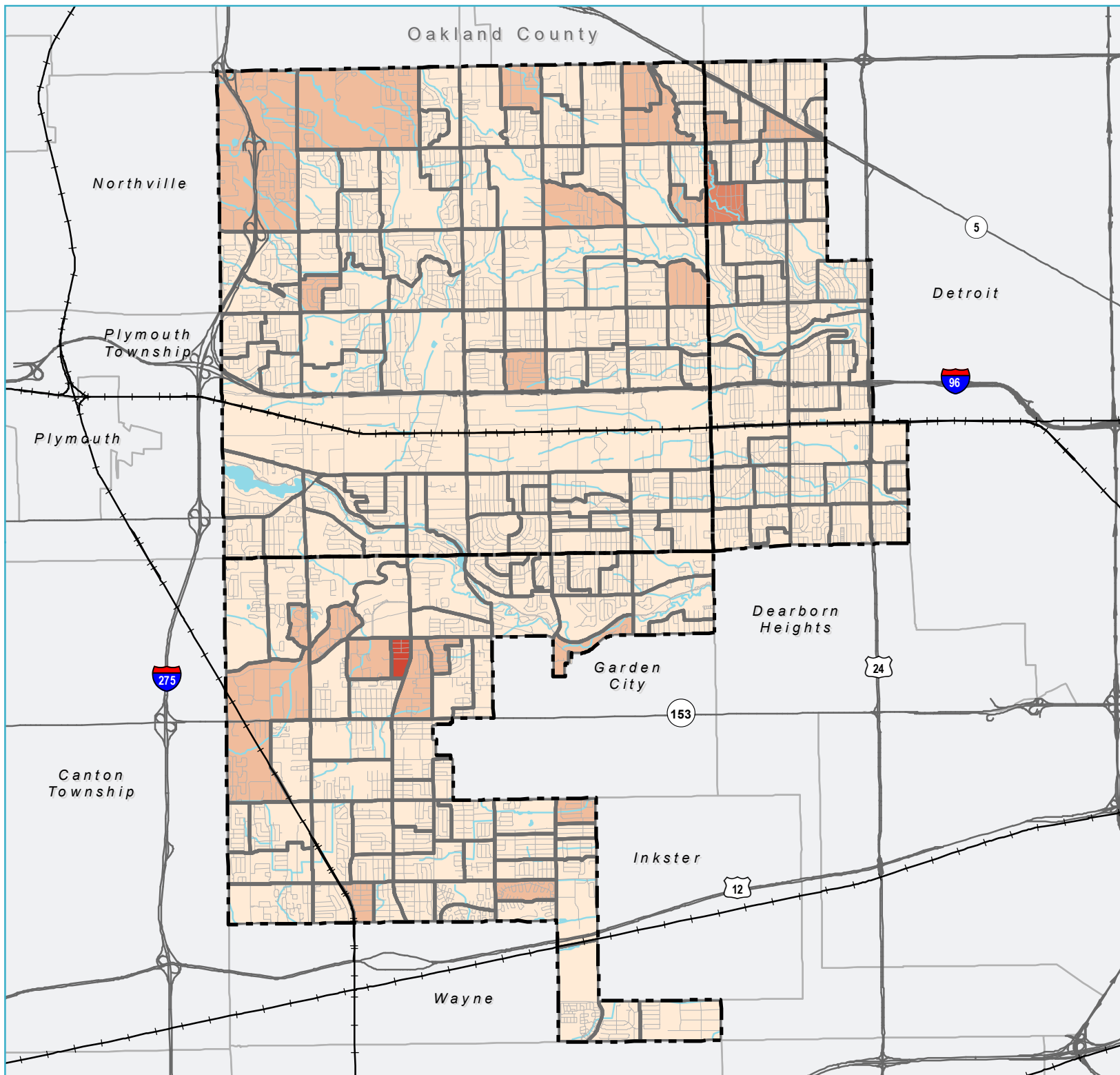
2022

Analysis of Impediments
to Fair Housing Choice

Populations Over
Age 65
Map

Percent Population Over 65 by Block Groups
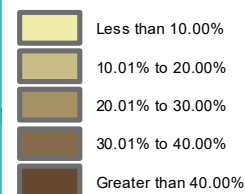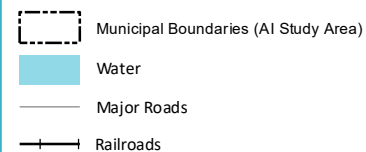
- Less than 10.00%
- 10.01% to 20.00%
- 20.01% to 30.00%
- 30.01% to 40.00%
- Greater than 40.00%

Base Data

- Municipal Boundaries (AI Study Area)
- Water
- Major Roads
- Railroads

Source: TIGER/Line Data; Michigan Open Data;
2016-2020 American Community Survey 5-Year Estimates;
2015-2019 American Community Survey 5-Year Estimates.

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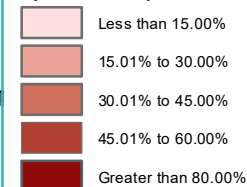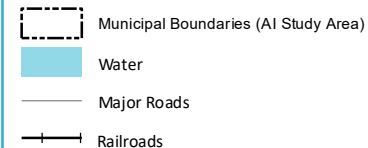500 Griswold Street
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Oakland County

Northville

Plymouth
Township

Plymouth

Canton
Township

Detroit

Dearborn
Heights

Garden
City

Inkster

Wayne

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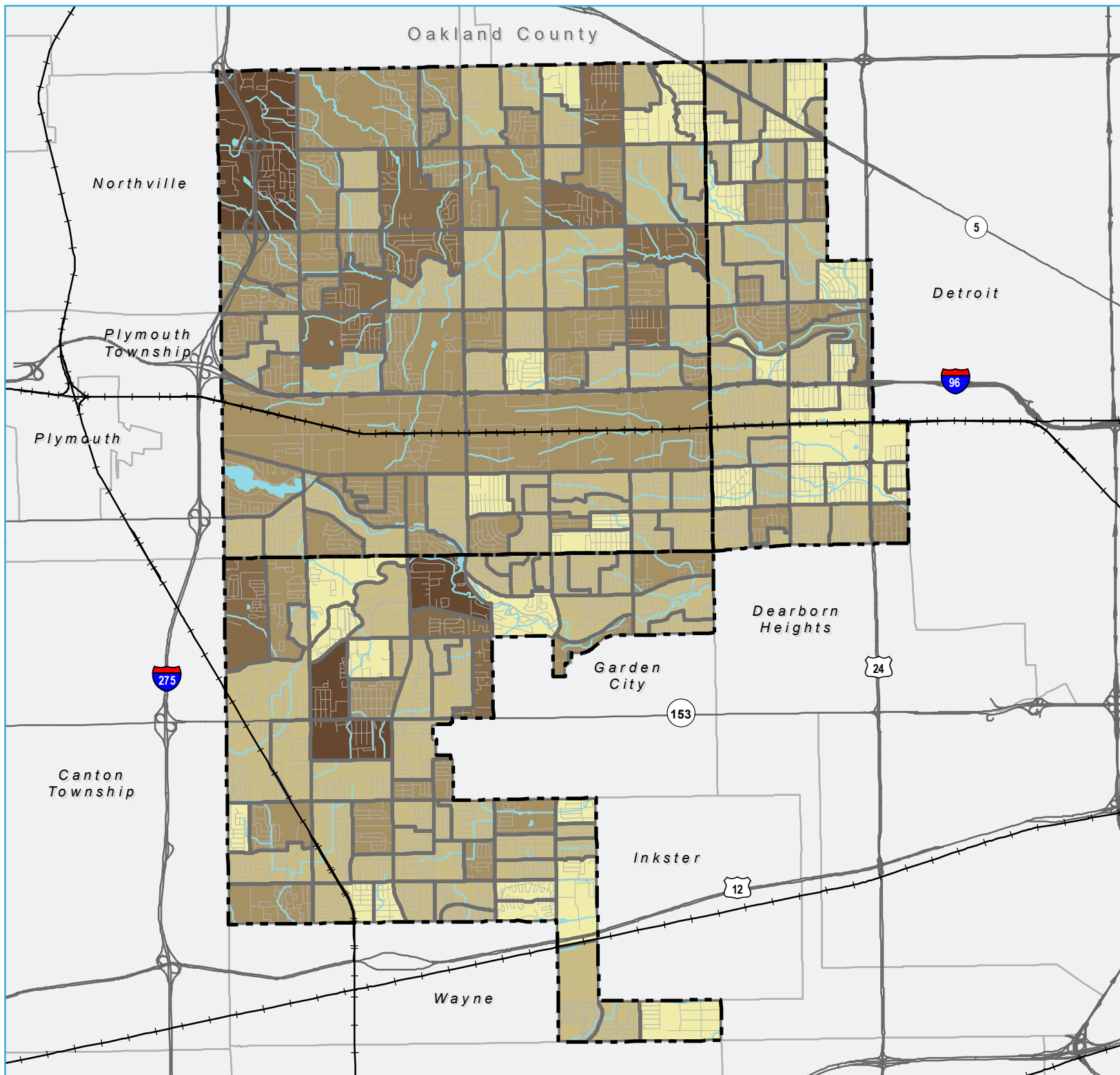
2022

Analysis of Impediments to Fair Housing Choice

Black/African American Population Map

Oakland County

Northville

Plymouth Township

Plymouth

Detroit

96

Dearborn Heights

Garden City

153

24

Canton Township

Inkster

12

Wayne

275

5

Black/African American Population by Block Group

- Less than 20.00%
- 20.01% to 40.00%
- 40.01% to 60.00%
- 60.01% to 80.00%
- Greater than 80.00%

Base Data

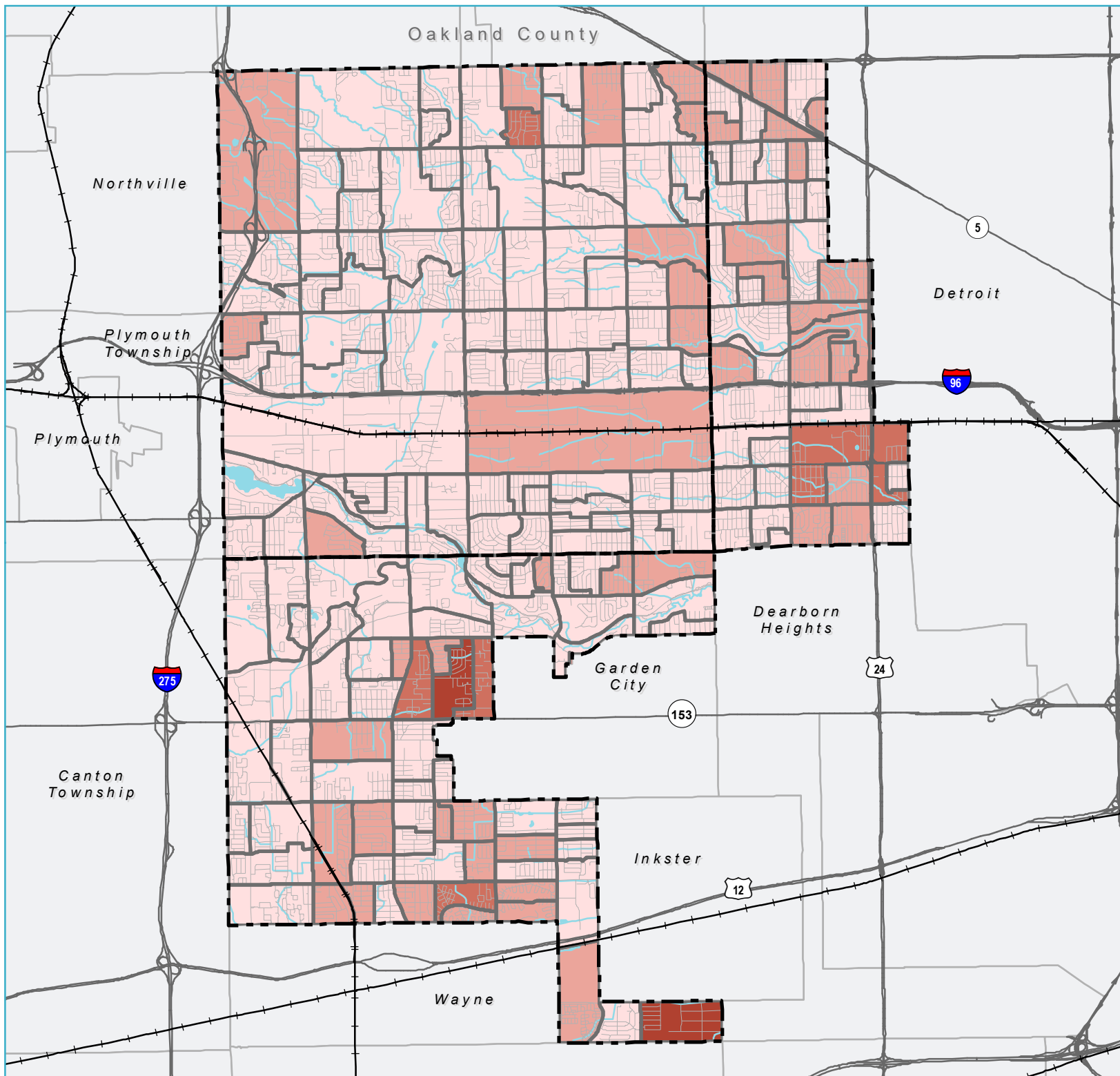- Municipal Boundaries (AI Study Area)
- Water
- Major Roads
- Railroads

Source: Michigan Open Data; U.S. Census Bureau 2020; 2016-2020 American Community Survey 5-Year Estimates; 2015-2019 American Community Survey 5-Year Estimates.

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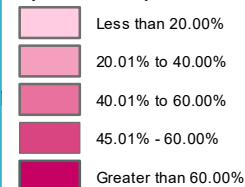Suite 2500
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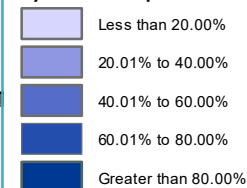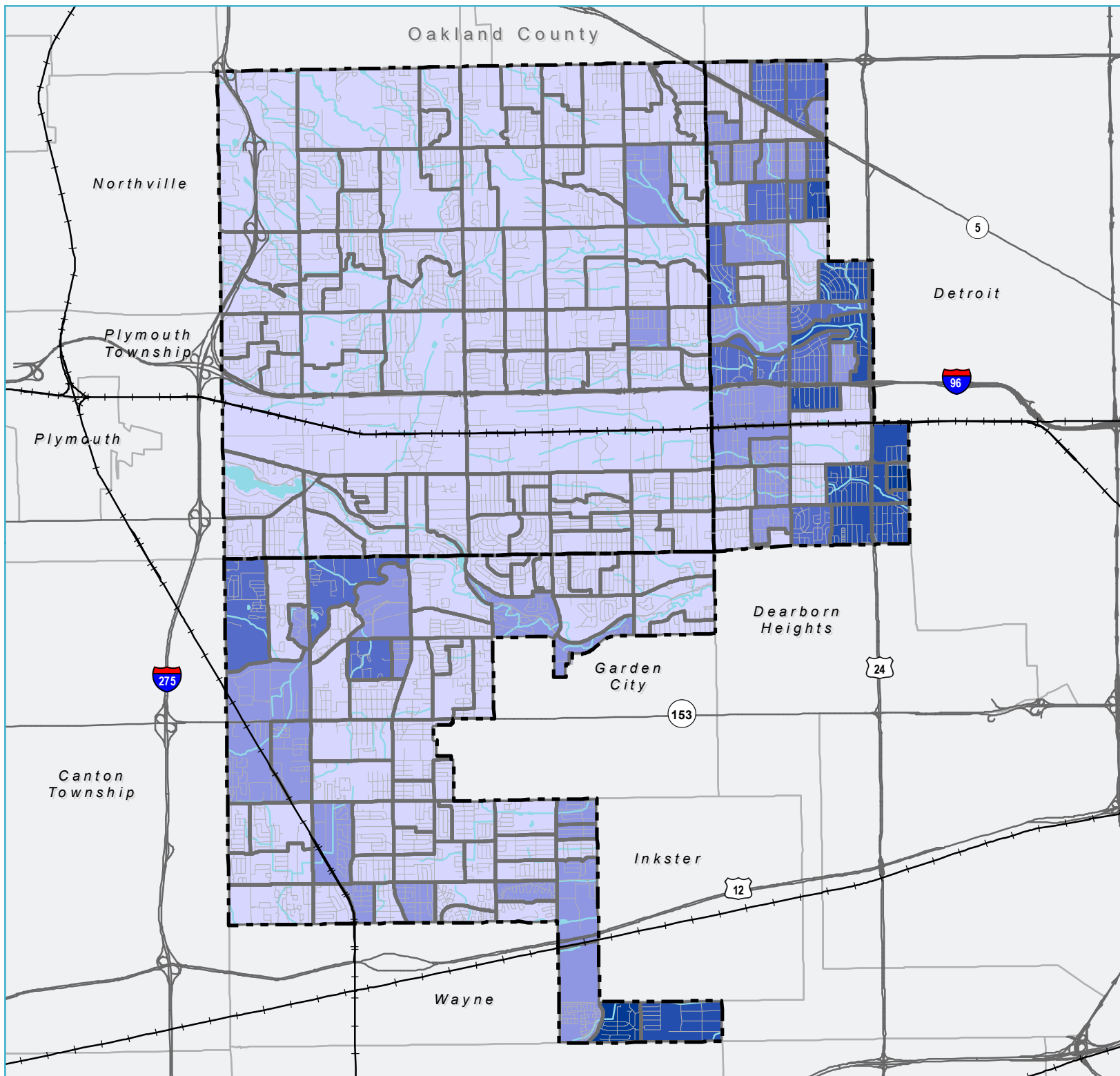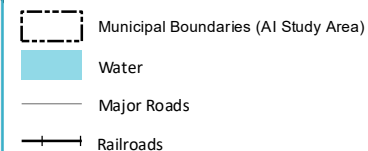
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Analysis of Impediments to Fair Housing Choice

Hispanic & LatinX Population Map

Hispanic or LatinX Ethnic Population by Block Group
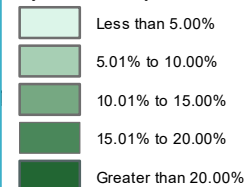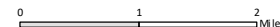
- Less than 5.00%
- 5.01% to 10.00%
- 10.01% to 15.00%
- 15.01% to 20.00%
- Greater than 20.00%

Base Data

- Municipal Boundaries (AI Study Area)
- Water
- Major Roads
- Railroads

Source: Michigan Open Data; U.S. Census Bureau 2020; 2016-2020 American Community Survey 5-Year Estimates; 2015-2019 American Community Survey 5-Year Estimates.

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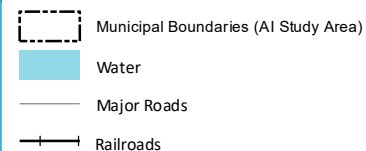500 Griswold Street
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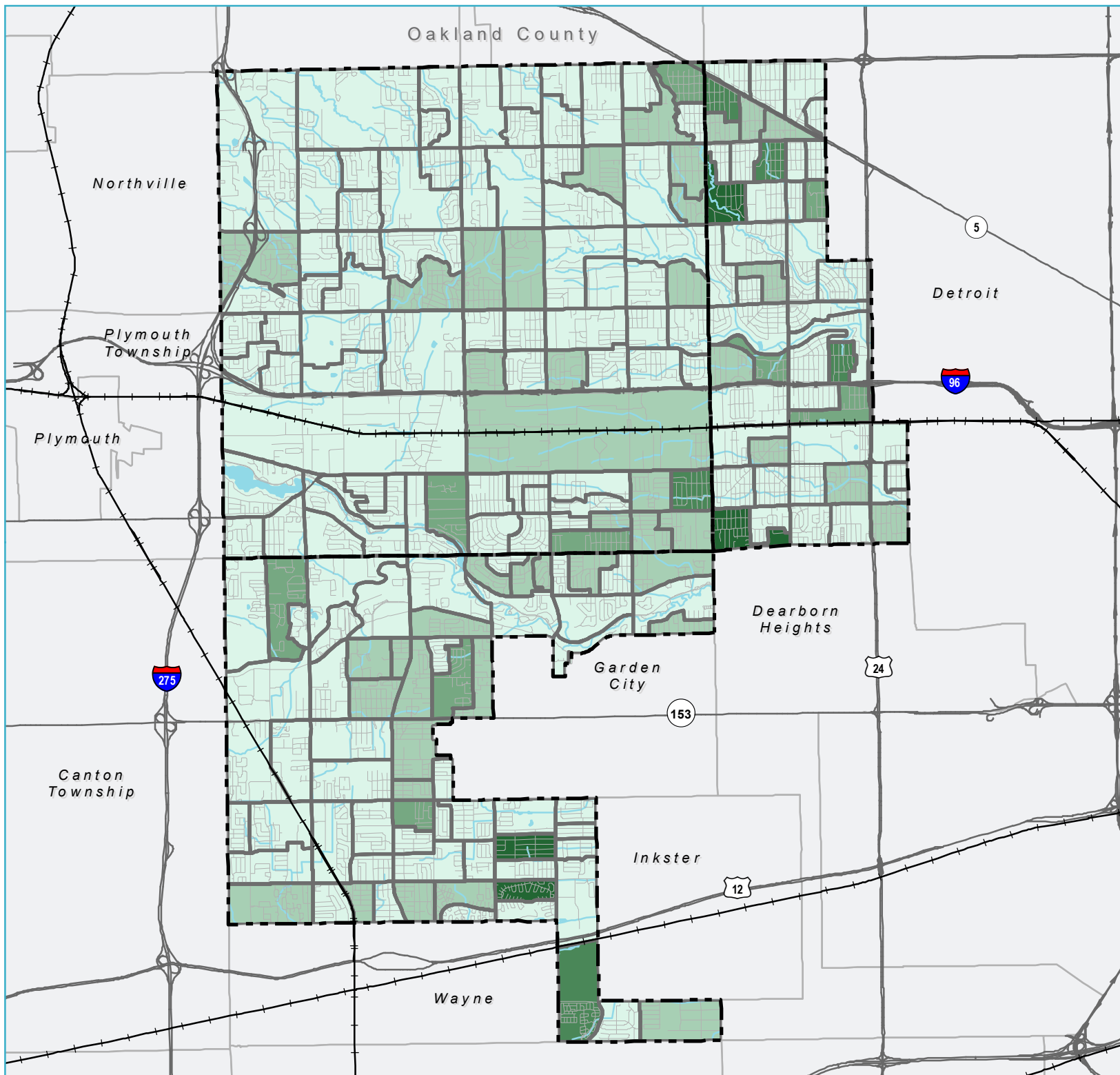
2022

Analysis of Impediments
to Fair Housing Choice

**Minority Race
Population
Map**

**Minority Race Population
by Block Group**
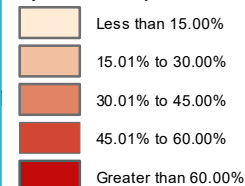
- Less than 15.00%
- 15.01% to 30.00%
- 30.01% to 45.00%
- 45.01% to 60.00%
- Greater than 60.00%

Base Data

- Municipal Boundaries (AI Study Area)
- Water
- Major Roads
- Railroads

Minority race includes American Indian and Alaska
Native, Asian, Native Hawaiian and Pacific
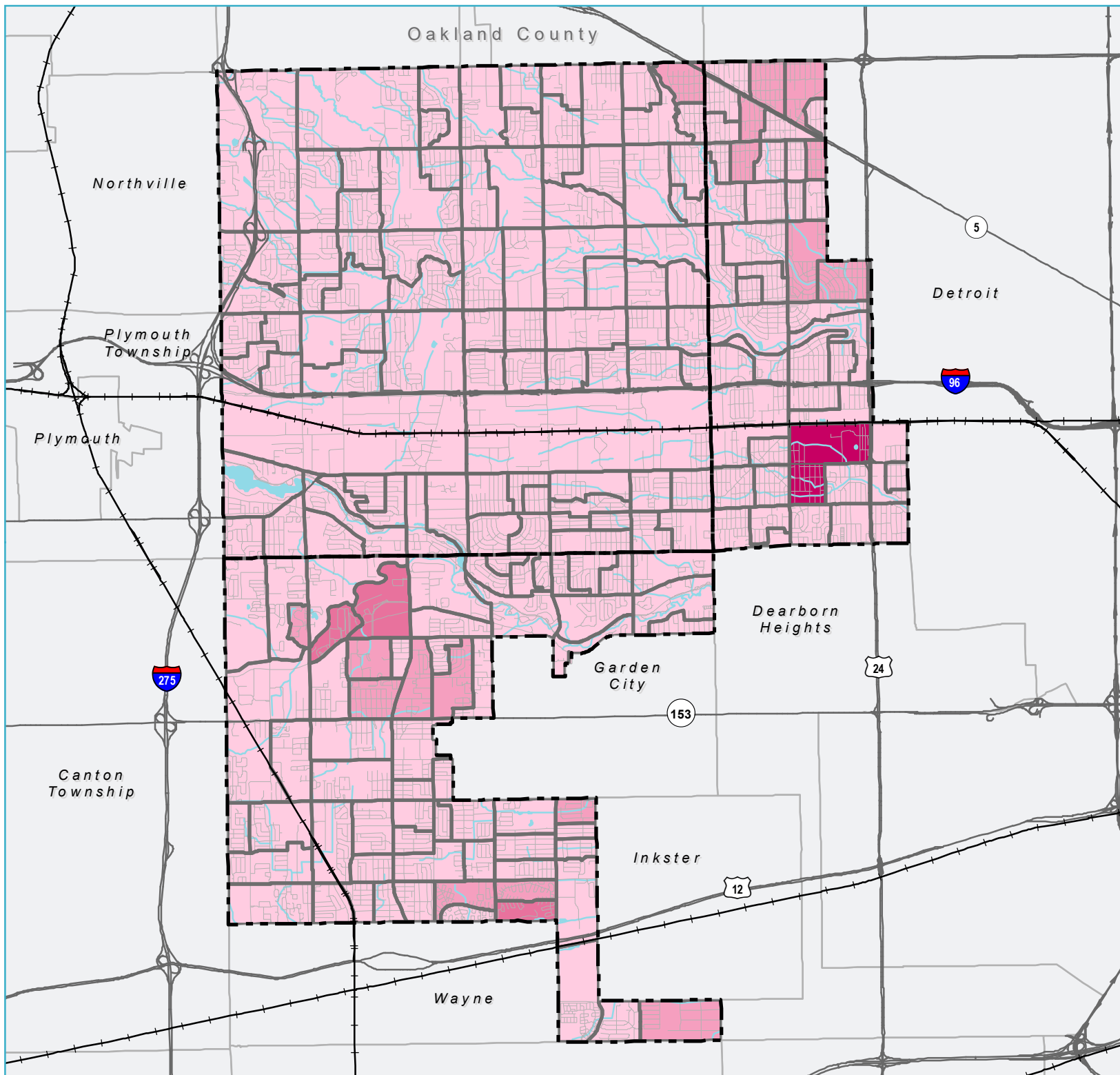Islander, Other Race, and Two or More Races.
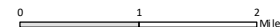
Source: Michigan Open Data; U.S. Census Bureau 2020;
2016-2020 American Community Survey 5-Year Estimates
2015-2019 American Community Survey 5-Year Estimates

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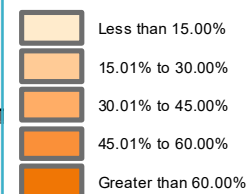500 Griswold Street
Suite 2500
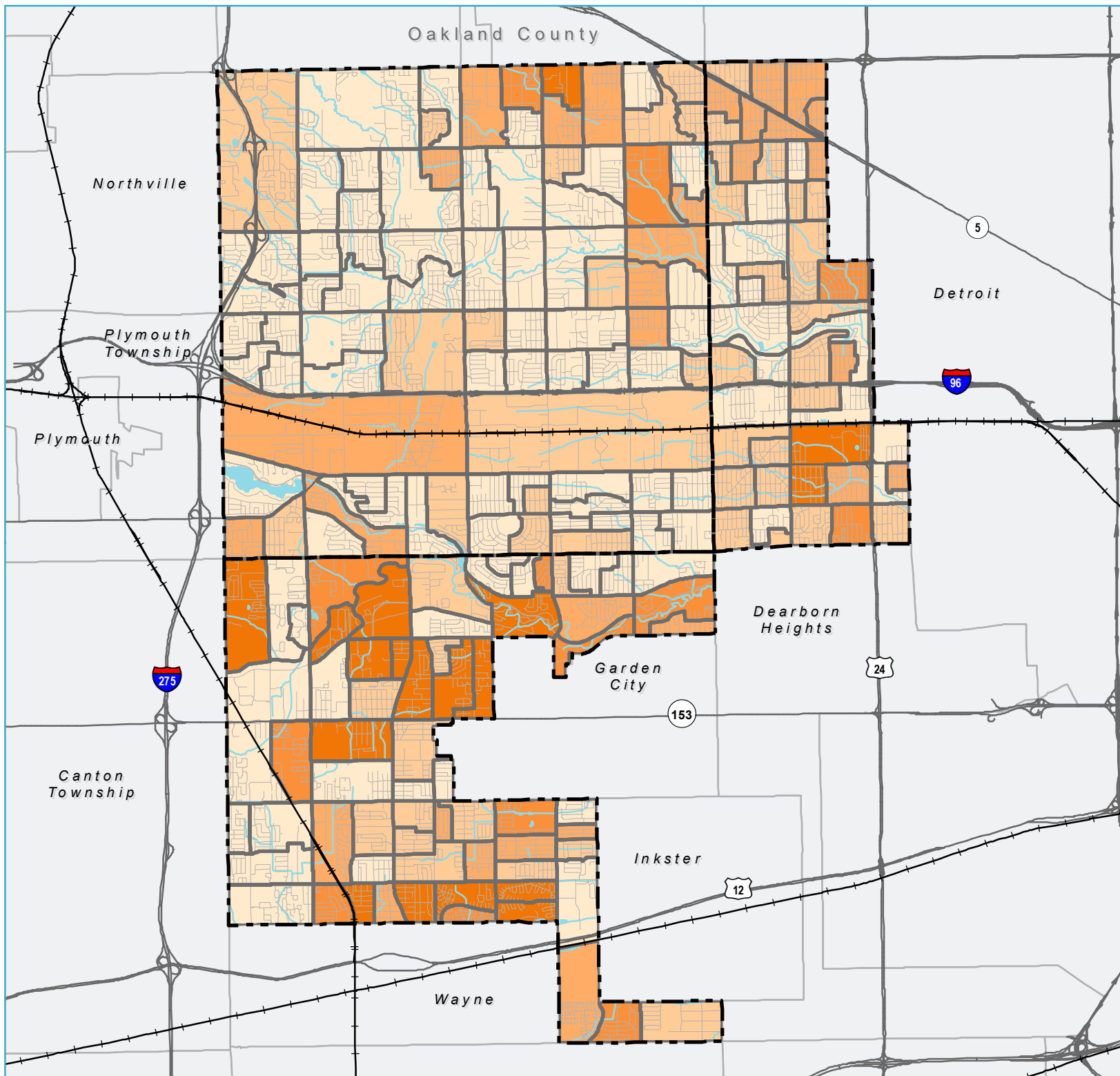Detroit, Michigan 48226
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Analysis of Impediments to Fair Housing Choice

Disability Status Map

Percent Population with Disability* by Block Group

- Less than 15.00%
- 15.01% to 30.00%
- 30.01% to 45.00%
- 45.01% to 60.00%
- Greater than 80.00%

Base Data

- Municipal Boundaries (AI Study Area)
- Water
- Major Roads
- Railroads

*Refers to population aged 20 to 64 with a disability
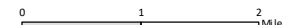
Oakland County

Northville

Plymouth Township

Plymouth

Detroit

Dearborn Heights

Garden City

Canton Township

Inkster

Wayne

5

96

275

153

24

12

Source: Michigan Open Data; U.S. Census Bureau 2020; 2016-2020 American Community Survey 5-Year Estimates; 2015-2019 American Community Survey 5-Year Estimates.

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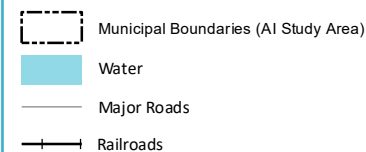Suite 2500
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Analysis of Impediments to Fair Housing Choice

Poverty Status Map

Populations Below the Poverty Line by Block Group

- Less than 20.00%
- 20.01% to 40.00%
- 40.01% to 60.00%
- 45.01% - 60.00%
- Greater than 60.00%

Base Data

- Municipal Boundaries (AI Study Area)
- Water
- Major Roads
- Railroads

Minority race includes American Indian and Alaska Native, Asian, Native Hawaiian and Pacific Islander, Other Race, and Two or More Races.

Source: Michigan Open Data; U.S. Census Bureau 2020; 2016-2020 American Community Survey 5-Year Estimates; 2015-2019 American Community Survey 5-Year Estimates.

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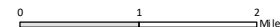
Analysis of Impediments
to Fair Housing Choice

Renter Occupied Map

Oakland County

Northville

Plymouth
Township

Plymouth

Canton
Township

Detroit

Dearborn
Heights

Garden
City

Inkster

Wayne

Percent Renter-Occupied by Block Groups

- Less than 15.00%
- 15.01% to 30.00%
- 30.01% to 45.00%
- 45.01% to 60.00%
- Greater than 60.00%

Base Data

- Municipal Boundaries (AI Study Area)
- Water
- Major Roads
- Railroads

N

0   1   2
Miles

Source: TIGER/Line Data; Michigan Open Data;
2016-2020 American Community Survey 5-Year Estimates;
2015-2019 American Community Survey 5-Year Estimates.

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Analysis of Impediments to Fair Housing Choice

Racial & Ethnic Integration Map

Racial & Ethnic Integration by Block Group

White Alone

Black or African American Alone

Hispanic or Latino (of any race)

Other Minority Races

1 Dot = 50 Persons

Base Data

Municipal Boundaries (AI Study Area)

Water

Major Roads

Railroads

Other minority races include individuals identifying as American Indian/Alaska Native, Asian, Hawaiian/Pacific Islander, or Two or More Races
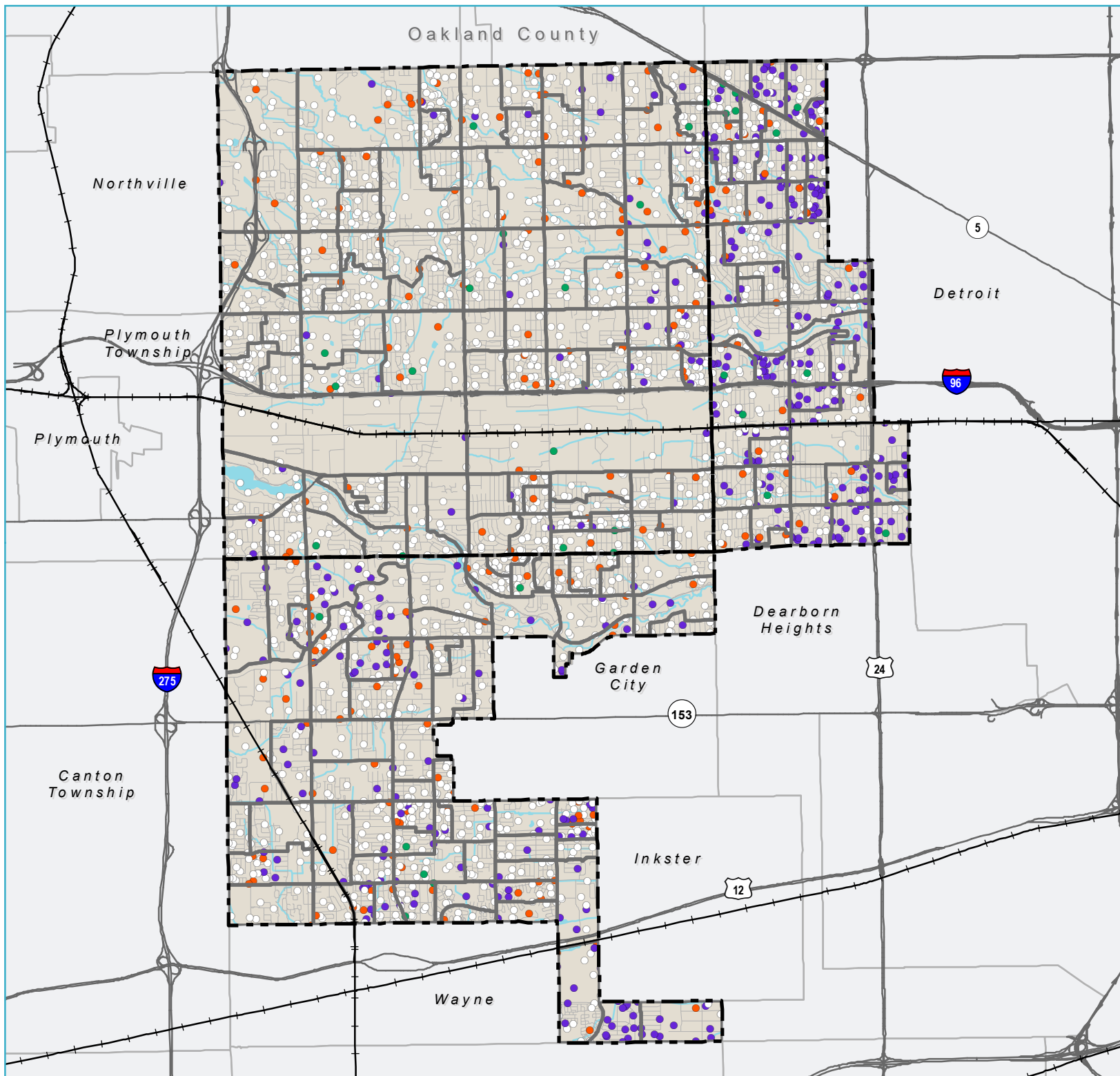
Source: Michigan Open Data; U.S. Census Bureau 2020; 2015-2019 American Community Survey 5-Year Estimates

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Heights

Garden
City

Inkster

Wayne

Existing Land Use (2020)

Agricultural/Rural Residential
Single-Family Residential
Multi-Family Residential
Mobile Home Residential
Mixed Use
Institutional
Commercial
Industrial
Transportation, Communications, Utilities
Recreational/Open Space
Parking
Vacant

Base Data

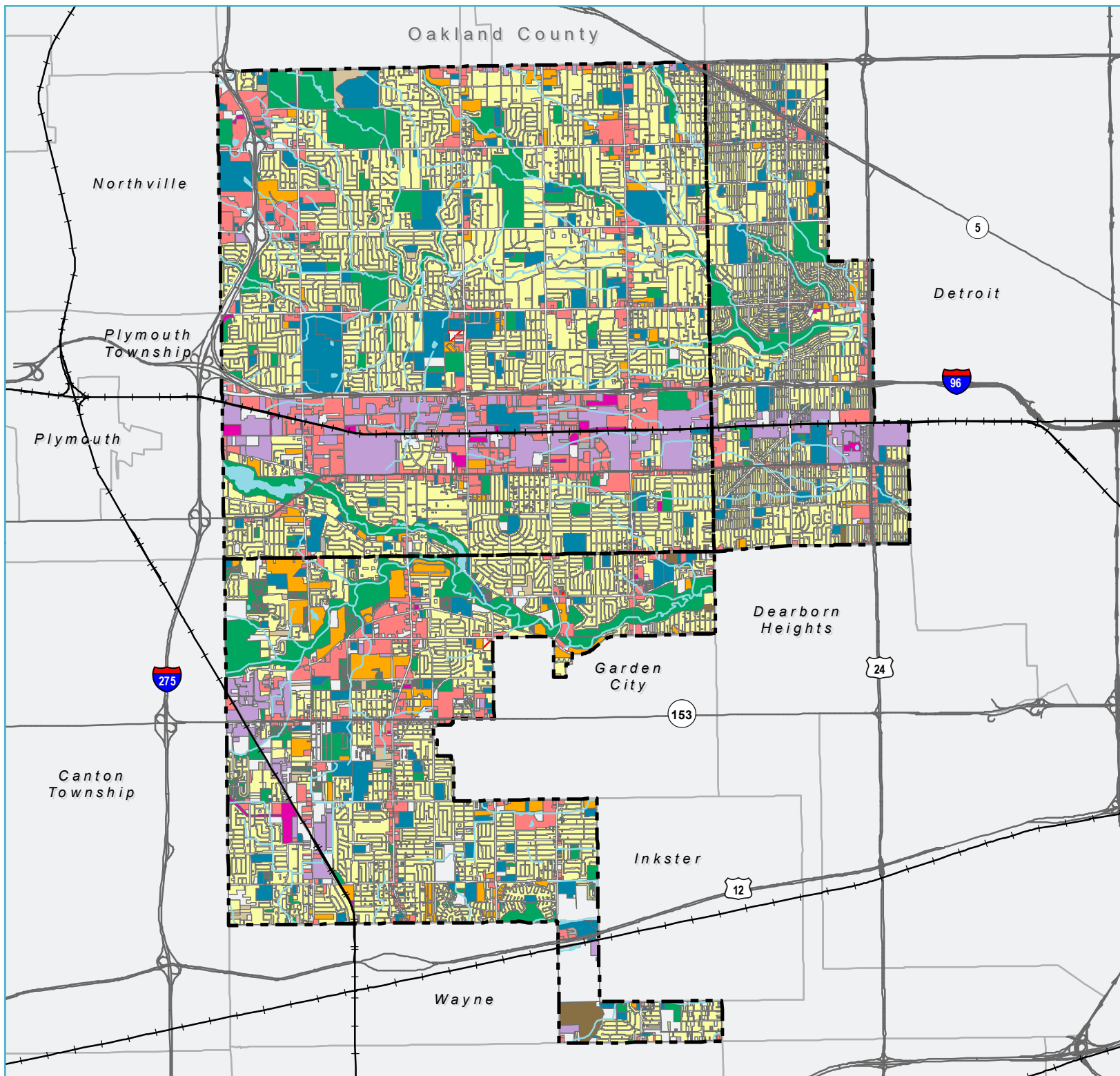Municipal Boundaries (AI Study Area)
Water
Major Roads
Railroads

Source: Michigan Open Data; SEMCOG

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