



Analysis of Impediments (AI) to Fair Housing Choice & Housing Needs Assessment

City of Wyoming, Michigan | Final Report: February 4, 2020



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Executive Summary

In the spring of 2019, the City of Wyoming began the process of updating its Master Plan. The Master Plan is an official municipal document that provides the framework for future land use, development, and reinvestment. It informs development standards regarding land use, infrastructure, transportation, parks and recreation, and community services and facilities. Wyoming's Master Plan will act as a roadmap for the future of land use and development over the next 15 to 20 years, providing a unified vision of the City's future.

Housing is a critical issue facing Wyoming and the broader region. The City of Wyoming chose to conduct the Analysis to Impediments of Fair Housing Choice (AI) as well as a housing needs assessment contained in this report in concert with the Master Plan process to ensure that housing policy is aligned with current and anticipated needs. This report summarizes housing challenges and opportunities over the next 20 years and identifies methods of corrections to address identified impediments. This report was developed as a component of the overall Master Plan process, but delivered as a separate companion product that complies with US Department of Housing & Urban Development (HUD) regulations 24 CFR 570.904(c).

Purpose of the AI

As a requirement of receiving funds under the Community Development Block Grant (CDBG), and the HOME Investment Partnerships (HOME), the City of Wyoming must submit certification of affirmatively furthering fair housing to the US Department of Housing and Urban Development (HUD). The certification consists of the following three elements:

- Complete an Analysis of Impediments to Fair Housing Choice, referred to as the AI;
- Implement actions to overcome the effects of any impediments identified in the AI; and
- Maintain records reflecting actions taken in response to the analysis.

Impediments to fair housing choice are defined in HUD's most recent *Fair Housing Planning Guide* as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; and
- Any actions, omissions, or decisions which have the effect of such.

The list of categories in the definition above comes from the federal Fair Housing Act. In addition, state and local governments may enact fair housing laws that extend the same protections to other categories or groups. Although the AI is a federally-required report, it generally addresses protected classes added at the state or local level also.

The *Guide* explains that analyzing fair housing impediments and taking appropriate actions means:

- Eliminating housing discrimination in the jurisdiction;
- Promoting fair housing choice for all;
- Providing housing opportunities for people of all races, colors, religions, sexes, national origins, disabilities, and family types;
- Promoting housing that is structurally usable by all people, particularly those with disabilities; and
- Fostering compliance with the non-discrimination features of the federal Fair Housing Act.

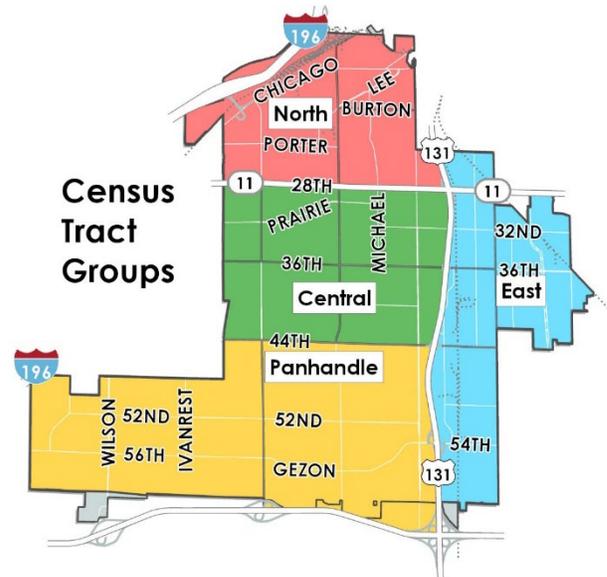
Methodology

The AI process suggested by HUD involves examination of various data sources related to housing markets, and the dynamics affecting residential housing choices and transactions, particularly for those persons in classes protected by federal, state, and/or local laws.

Sources of information include US Census data, employment and income information, residential mortgage financing data, business lending data, fair housing complaints, and information gathered by surveys and/or interviews from housing industry experts, consumers and other stakeholders, media, and housing-related sources in the public domain.

Geography

Wyoming's geography encompasses 14 US Census Tracts, numbering from Tract 133 to Tract 145.02. For purposes of this study, the census tracts have been grouped according to geography into four local subareas, roughly representing the Northern, Eastern, Central, and southern or "Panhandle" areas of the city.



Overview

Analysis of demographic, economic, and housing data included in this AI establishes the context within which housing choices are made. Demographic data describe racial and ethnic populations and other protected classes, while economic and employment data illustrate additional factors that influence housing choice. Descriptions of housing by type, occupancy, and cost demonstrate the capacity of Wyoming's housing supply to meet the needs of residents and home seekers.

This context provides a basis for review of fair housing laws and complaints, and the public and private policies and practices that may significantly affect housing choice.

Socio-economic Context

Wyoming is a west Michigan suburban city of 75,124 residents located 30 miles inland from the shores of Lake Michigan. It offers a blend of urban life and natural environment with a culture of government, education, employment, and lifestyles reflecting the values of its residents and businesses.

Today, Wyoming is the state's 16th largest community with west Michigan's third largest industrial tax base, diverse cultural backgrounds, seven school districts, a variety of older and modern homes, and small commercial areas scattered throughout. According to U.S. Census American Community Survey (ACS) 2017 data, the Wyoming economy employs 39,000 people, primarily in manufacturing, health, social service, and retail trade with a 20-minute average commute by car.

Wyoming is a relatively young and diverse community within the context of west Michigan and the Grand Rapids-Wyoming Metropolitan Statistical Area (MSA) with more than one in 10 of its residents foreign born, and a median age of 33.1 years. This median is younger than Kent County's median age of 35 years and the MSA median age of 35.7 years. Persons under 18 years of age comprise 26% of Wyoming's residents, a slightly higher rate than that of the county (24.9%) or the MSA (24.6%).

Households living in the city's 27,915 occupied housing units had a median income of \$50,971 in 2017, which was significantly lower than the median household income for the Grand Rapids-Wyoming MSA (\$61,298) and the U.S. (\$60,336). Wyoming's population, number of households, and median household income all increased from the previous year, with household income growing by nearly 5% in that time.

Households

Household economic data from 2014 and 2017 ACS 5-year estimates demonstrates the increasing health of the regional economy. The Wyoming economy employed 39,000 people in 2017, primarily in manufacturing, health and social service, and also in retail trade. Major employers located in Wyoming include Metro Health: University of Michigan, General Motors, Gordon Foods, UPS and Michigan Turkey Producers, with nearby employers throughout the metro area also benefiting from the city's workforce.

Among residents of Wyoming, the most common employment sectors are the same, led by manufacturing (9,170 employees), health care and social assistance (5,050), and retail trade (5,005). Resident commute to work times average from 20 to 22 minutes throughout the entire MSA, including the county and Wyoming.

Wyoming includes the highest proportion of individuals with earnings in the MSA and county.¹ Per capita earnings, however, lag well behind the per capita earnings of Kent County, the MSA, and the state. Wyoming's 2017 per capita dollars of \$24,115 represents \$4,624 less than the MSA, and \$5,318 less than the county, a difference of 22%. Michigan's per capita income of \$28,938 is 20% higher than that of Wyoming.

Poverty rates range from 12.4% throughout the entire MSA to 15.50% for Wyoming residents as a whole. All areas of this study have experienced a decline in poverty from 2014 to 2017, reflecting the economic recovery of west Michigan as well as the entire state following the 2008 downturn. In the specific age groups of residents under 18 years and over 65 years, Wyoming poverty rates have dropped by a smaller margin than the county and the MSA. That smaller decrease is also seen in the use of SNAP (food stamp) benefits within the past 12 months, dropping by less than one percentage point while the larger areas dropped by 1.6 points (Kent County) and 4.6 points (MSA).

Race and Ethnicity

Wyoming is a diverse community in racial and ethnic terms compared to the county and the MSA, with a Hispanic or Latino population of over 20% (16,571 persons), nearly twice as high as the county and more than twice that of the MSA. Most of the Hispanic population is Mexican by origin (slightly over two-thirds, or 68.6% of Hispanic residents), making up 15.1% (11,374 people) of Wyoming's total population.

Within the US Census categories of those who identify as one race, White individuals number 56,196, and make up less (74.80%) of Wyoming's population than that of Kent County (80.3%) and the MSA (84.7%). Hispanic individuals are the largest minority group by ethnicity, followed by the racial minority group of Black and African American persons who make up less than 8% of the city's

¹ US Census American Community Survey 2017 5-year Estimates: Grand Rapids-Wyoming MSA, Kent County, Wyoming

residents. Wyoming's foreign-born population, at 11% of residents, is greater than that of either Kent County or the surrounding MSA. Residents with disabilities and those over 65 years of age accounted for more than 30% of Wyoming's population in 2017.

Income

Cost, affordability, and availability are the housing issues most frequently mentioned in community meetings and by survey respondents. The substantial difference in tract median family incomes makes clear that the issue of affordability related to limited financial resources is concentrated in certain areas, particularly census tracts 133, 135 (Northern Wyoming subarea), and 138.02 (Central Wyoming subarea). The remaining tracts in Northern Wyoming, Central Wyoming, and Wyoming East of US-131 reflect incomes above \$50,000 per family. Family incomes rise above the MSA median of \$67,000 only in the two Wyoming Panhandle census tracts, 145-01 and 145.02.

Housing

Although Wyoming is a sizable rental market, owner occupancy of the units described ranges from a low of just under 60% to a high of more than 77.7%. The citywide owner occupancy measure of 65% is substantially higher than that of Grand Rapids (54%), and less than that of Kent County (69%) and the MSA (72.3%).² In the city as a whole, 1-4 family units are occupied by their owners at an average rate of 79.62%, or nearly eight in ten homes.

Cost

Wyoming's housing supply offers a broad range of options in type, location, cost, and occupancy status. According to comments of Steering Committee members, developers, and those who attended a community workshop, the term *affordable housing* can often prompt a negative reaction, based on perceptions that those seeking affordable housing are somehow less than desirable neighbors.

A deliberate and thoughtful effort on the part of Wyoming to promote a wider understanding of housing costs will help to build the necessary public support for increasing its affordable housing inventory as residents recognize the impact of housing and related costs on their own households and those of their neighbors.

According to an annual report issued by the Michigan Association of United Ways, more than 40% of Michigan's population cannot afford basic household necessities (housing, child care, food, transportation, health care, a smartphone, and taxes). Between 2010 and 2017, the basic cost of household expenses increased by 27% for a family of four – requiring an annual income of \$61,000 (\$64,788 in Kent County) to meet expenses, significantly higher than the corresponding 2017 federal poverty level of \$24,600. More than six in 10 jobs in Michigan pay less than \$20 per hour, while a family of four requires \$30.64 (\$32.39 in Kent County) per hour to cover basic costs.

Examination of monthly housing costs as a percentage of income at various income levels and occupancy categories illustrates the differences among owners and renters at various income levels. The highest number and percentage of renters - more than one in four renters in Wyoming - are those in the lowest income category with annual incomes of less than \$20,000. For those households, nearly all (93.7%, or 2,572 households) are paying more than 30% of their income towards housing costs. The housing needs assessment located in Section 12 of this report supports this, indicating a need for over 1,000 rental housing units for households earning less than \$20,000 per year.

² US Census American Community Survey 2017 1-year Estimates

The number of renter households with incomes from \$20,000 to \$34,999 is nearly as large as those earning less than \$20,000. This income group shows housing costs of more than 30% of annual income for 70.1% of renter households, and 50.3% for homeownership households.

For households with annual incomes between \$35,000 and \$49,999, nearly one in four households (23.1% of) are housing cost burdened with minimal difference between renters and homeowners. For households earning more than \$50,000 annually, which make up 51.8% of all Wyoming households, approximately one in 10 (9.7%) experience housing cost burden.

Homelessness

Information provided by the Michigan Coalition Against Homelessness, and from the Kent Intermediate School District as to numbers of homeless students from these seven Wyoming school districts, taken together indicate that the city is not immune to the issues of housing cost, and various other factors that negatively affect household stability and contribute to homelessness. In this analysis, no shelters or offices related homeless services were identified as being located within the City of Wyoming's borders. While Wyoming is an active participant in the countywide network of homeless service providers committed to the challenge of housing the homeless, the level of homelessness affecting the Wyoming community may warrant more focused attention at the local level.

Public Sector

Fair housing choice for residents and homeseekers in Wyoming is impacted by a number of factors in the public sector, including public housing authority policies and practices; the extent and geographic location of publicly-subsidized housing units; land use and zoning regulations, policies, and practices; construction and building codes; and the provision of government services. Local decision-making concerning policies and resources, along with effective implementation and public accountability, are important considerations affecting the range and accessibility of housing options available to a diverse population.

Programs supported by and through the City of Wyoming attest to the community's strong interest in housing as a key component of their quality of life for a diverse and growing city.

The City's CDBG programming is informed by a Community Development Committee, a Council-appointed group of Wyoming residents who advise City officials, assist in formulation and recommending approval to the City Council of the Five-Year Regional Consolidated Plan, and recommend priorities for the annual CDBG budget.

The Wyoming Housing Commission owns and operates publicly-owned and subsidized housing in Wyoming, and provides federally-based housing subsidies throughout a large geographic area shared with neighboring jurisdictions. The Commission owns 195 units located at Westwood Apartments, Waldon Woods, and various scattered locations throughout the city. The Commission also administers 1,157 Housing Choice Vouchers (Section-8) within Kent County and part of Ottawa County.

Local Zoning and Building Regulations

Increasingly, desirable housing is understood as housing that is affordable, and proximate to employment, education, and a multitude of services that contribute to residential quality of life. To the extent that zoning regulations limit the production of contemporary housing styles apart from detached, single-family units, the regulations themselves may come to be seen as barriers to housing choice. A review of Wyoming's Zoning map reveals the fact that most of Wyoming is zoned as Residential, in zones labeled from R1 to R7, and that single-family housing is the predominant housing type. According to US Census Bureau 2017 ACS data, approximately two-thirds of Wyoming's housing is owner-occupied and one-third is renter-occupied.

In addition to its more traditional zoning ordinance, Wyoming has a Form Based Code (FBC) covering three key areas of the City: Division Avenue, Burton Street, and the designated downtown area of the 28th Street Corridor. Adopted in 2013 and amended in

2016 and 2018, the form based codes are described in the Code's Introduction as, "a type of zoning code that emphasize the physical character of development (its form) and de-emphasize the regulation of land use." The purpose of the FBC is to create a compact, transit-oriented development pattern that fosters multi-modal corridors, mixed uses, and a diversity of residential development.

Complaints

Wyoming's Fair Housing Ordinance demonstrates their strong commitment to *affirmatively further fair housing* in accordance with Community Development Block Grant program requirements; however the ordinance is not often used. Claimants have the ability to file complaints under state and federal laws that generally offer greater opportunity for investigation and prosecution if warranted, and provide for higher penalties and compensation to individuals who have been discriminated against. The city's longstanding contractual agreement with the Fair Housing Center of West Michigan (FHCWM) offers the capacity to investigate complaints, frequently through the use of comparison testing which pairs trained, scripted individuals of differing characteristics in a housing search. FHCWM also assists claimants in pursuing enforcement action that may include compensation and corrective action where claims are upheld.

A total of 84 complaints of housing discrimination regarding Wyoming properties were examined for this analysis, some of which were double-filed between different but substantially equivalent agencies. Complaints were registered based on race or color, familial status, disability, national origin, source of income, sex, and age. The majority of complaints were closed administratively, without sufficient evidence to support a claim of unlawful discrimination.

The variety of case outcomes reported by the Fair Housing Center is indicative of the unique nature of fair housing complaints received. Grouped under a single set of anti-discrimination laws, the cases themselves vary in numerous ways and that is evident in the wide variety of possible outcomes. Most notably, complaints were resolved for 39 claimants, while enforcement action led to 523 housing units becoming available as discriminatory practices were corrected. Monetary settlements totaling more than \$3,000 were secured, and housing valued at nearly \$20,000 was obtained or retained for 15 claimants.

Private Sector

Policies and practices of the rental and sales housing markets as well as mortgage financing impact housing choice throughout Wyoming. Factors related to rental of housing and the treatment of tenants were identified, and noted as areas that may benefit from education and support. Regarding home mortgage lending, examination of lending data indicated differences in the outcome of loan applications despite similarities in applicant incomes. Hispanic residents are the largest minority population group in Wyoming, representing more than one-fifth of the community. Even accounting for large numbers of applicants whose ethnic or national origin characteristics are not identified, the disparities in loan origination rates and positive outcome rates for all residential loan applications and particularly those for the purpose of purchasing a home are significant, and warrant closer examination to determine the reasons for the differences.

Findings

- Wyoming's young and diverse population, large industrial tax base, and convenient access to major employment, services, and transportation provide a platform to maintain and enhance the social and economic quality of life currently valued by its residents.
- The Steering Committee identified accessible and affordable housing stock as their top priority.
- Community engagement revealed a strong desire that the City's Boards and Commissions represent Wyoming's diversity.
- Despite its consistently high employment rate, Wyoming's 2017 median income of \$50,971 is significantly less than either Kent County or the surrounding MSA region.

- Nearly 14% of Wyoming residents live with a disability, and those over 65 years of age account for almost 35% of its population.
- According to the Center for Neighborhood Technology, Wyoming has a H+T Affordability Index score of 46 (out of 100). This reflects a combination of overall housing costs (22 for a typical household), and transportation costs in the same range at 24. The H+T Affordability Index (which is discussed in Section 2) offers an expanded view of affordability at local levels, one that combines housing and transportation costs and sets the benchmark at no more than 45% of household income.
- Wyoming renters represent a third of its population, and about half of them are cost-burdened by housing costs that consume more than 30%, or often even more than 35%, of their total monthly household income.
- The Wyoming Housing Commission does not maintain the necessary data concerning household and neighborhood race, ethnicity, income and location to carry out a key part of its strategy to address housing needs, counseling Section 8 residents as to locations of units outside of areas of poverty or minority concentration and assist them in locating those units.
- The majority of fair housing complaints to federal and state enforcement agencies as well as the Fair Housing Center of West Michigan allege unlawful discrimination in rental housing related to disabilities;
- Over 800 homeless people – individuals, families with children, and unaccompanied youth – were a part of the Wyoming community in 2018.
- In all Wyoming loan applications submitted in 2017, Hispanic applicants fared worse than non-Hispanic applicants with fewer loan originations, higher denial rates, and a lower rate of positive outcomes overall. Differences between Black and White applicants (which racial categories that include persons of Hispanic or Latino ethnicity) were modest, and did not consistently favor any racial group.

Impediments

- The high cost of rental housing and extreme burden those costs place on tenants present a barrier to fair housing choice. While housing costs for homeowners have decreased slightly since 2014, the increase in cost burden for renters is significant and indicates a need to focus specifically on actions that can be taken to assist renter households.
- Negative perceptions toward the term “affordable housing” exist and can undermine public support of housing development and interfere with efforts to increase housing options aligned with household incomes and affordability.
- The Wyoming Housing Commission’s lack of contemporary information about local concentrations of poverty and minority residents prevents the Commission from carrying out its strategy of assisting residents in effective housing searches and may inadvertently exacerbate the growth or persistence of those housing patterns.
- Successful fair housing complaint outcomes, particularly concerning reasonable accommodations for persons with disabilities, may indicate a lack of awareness regarding fair housing issues and compliance that acts as an impediment to housing choice for those with disabilities.
- Geographic boundaries applied to fair housing services due to HUD grant-related requirements and local financial support may limit anti-discrimination enforcement options for residents and would-be residents.
- Unfavorable outcomes in loan originations and denials for loan applications from Hispanic applicants presents an impediment to homeownership for Wyoming’s largest minority population, whether residents or would-be residents.
- Homelessness affecting Wyoming residents indicates the existence of short-term or chronic impediments to housing choice, and an inability to resolve housing issues for oneself or one’s household due to limitations of capacity or circumstances.

- The lack of information regarding racial, ethnic and geographic characteristics of Boards, Commissions and Committees charged with leadership responsibilities is a barrier to ensuring that the diversity of the Wyoming community is represented at desired levels.

Recommendations

Each of the following recommendations is explained in greater detail in Section 11. Impediments and Opportunities.

Recommendation #1: Data

Establish Information and data protocols for the City of Wyoming, and the Wyoming Housing Commission to support fair housing goals and strategies.

Recommendation #2: Development

Work with private and community-based entities to align interests and facilitate contemporary housing and mixed-use development in those areas most appropriate for affordability.

Recommendation #3: Renter Households

Support services that focus on Wyoming's rental population to increase access to and maintenance of safe housing as a means of promoting stability and quality of life.

Recommendation #4: Homelessness

Develop a community-driven framework to guide local actions of City officials, agencies, law enforcement and community groups to address homelessness. Such a framework will ideally involve residents, businesses, employers, schools, churches, law enforcement and other community sectors in understanding who is homeless in Wyoming, identifying policies and/or actions to assist in housing those who are in need, and clarifying the roles of key partners in government and law enforcement, housing and human service agencies, and various other community sectors related to homelessness.

Recommendation #5: Fair Housing Complaints

Continue to work to ensure support of fair housing services to the entire Wyoming community.

Recommendation #6: Residential Lending

Analyze current individual Home Mortgage Disclosure Act (HMDA) records to inform the understanding of lending patterns and engage area lending institutions in a partnership to formulate steps to eliminate racial or national origin disparities.

Conclusion

These recommendations, along with the AI's findings and identified impediments, are intended to provide a starting point for civic planning and action, and are especially timely considering the current development of *Wyoming [re]Imagined*, a Master Plan to frame the future of Wyoming.

As the environment shifts over time and the circumstances influencing housing choice change in scope and direction, new information should be incorporated into both the planned action steps and the periodic evaluation of those activities to gauge their effectiveness in affirmatively further fair housing.

Section I. Introduction

This *Analysis of Impediments to Fair Housing Choice (AI)* was conducted for the City of Wyoming, in compliance with requirements imposed by the US Department of Housing & Urban Development (HUD) on entitlement jurisdictions that receive federal funds under various housing-related programs.

Wyoming has been a participant in HUD's Community Development Block Grant (CDBG) Program since its inception in 1974. Although each entitlement community is responsible for the planning, implementation, management, and monitoring of its local programming, federal regulations require various citizen input and review opportunities in addition to other planning activities, including an AI, to inform progress toward priorities.

In the Fair Housing Planning Guide, HUD defines the AI as:

“... a comprehensive review of a state's or entitlement jurisdiction's laws, regulations, and administrative policies, procedures and practices. The AI involves an assessment of how these ... affect the location, availability and accessibility of housing and how conditions, both public and private, affect fair housing choice.”

Requirements were updated in 2000, stating in part:

“The Consolidated Plan regulation (24 CFR 91) requires each state and local government to submit a certification that it is affirmatively furthering fair housing.”

Failure to comply with this or other regulatory requirements can jeopardize the recipient community's participation in future federal CDBG programs, resulting in a loss of funding for local fair housing activities as well as other important community development programs.

Community Context

Wyoming is a west Michigan suburban city of 75,124³ residents located in Kent County, about 30 miles inland from the shores of Lake Michigan. According to its website, the City of Wyoming has a long and proud history since its incorporation in 1959 from Wyoming Township. Mainly developed during the post-World War II period, the community can be characterized as a Tier 1 “inner ring” suburb, located southwest of, and adjacent to, the larger city of Grand Rapids. It is, however, a community in its own right that offers a desirable blend of urban life and natural environment with a culture of government, education, employment and lifestyles reflecting the values of its residents and businesses.

Today, Wyoming is the state’s 16th largest community with west Michigan’s third largest industrial tax base, diverse cultural backgrounds, seven school districts, a variety of older and modern homes, and small commercial areas scattered throughout. According to ACS 2017 data, the Wyoming economy employs 39,000 people, primarily in manufacturing, health, social service, and retail trade with a 20-minute average commute by car.

Wyoming is a relatively young and diverse community within the context of west Michigan and the Grand Rapids-Wyoming Metropolitan Statistical Area (MSA)⁴ with more than one in 10 of its residents foreign born, and a median age of 33.1 years, younger than Kent County’s median age of 35 years and the MSA at 35.7 years. Persons under 18 years of age comprise 26% of Wyoming’s residents, a slightly higher rate than that of the county (24.9%) or the MSA (24.6%).⁵

Households living in the city’s 27,915 occupied housing units had a median income of \$50,971 in 2017, which was significantly lower than the median household income for the Grand Rapids-Wyoming MSA (\$61,298) and the U.S. (\$60,336). Wyoming’s population, number of households, and median household income all increased from the previous year, with household income growing by nearly 5% in that time.

The city extends roughly from Grand Rapids on the north to the M6 highway on the south, and from Division Avenue (slightly east of the US-131 highway) west to the city of Grandville, and the Ottawa County border. A major commercial district reflects the pattern of early suburban development along southwest 28th Street, a main traffic artery currently known as a commercial and retail center. Wyoming covers almost 25 square miles and is made up of 14 census tracts. The city is only informally organized into small neighborhoods and is much more clearly delineated by the main arteries crossing east to west: 28th Street SW to the north, and the mixed-use 44th Street SW unofficially defining the north-south middle of the city.

³ US Census Bureau 2017 American Community Survey (ACS) 5-year Estimates

⁴ The US Office of Management and Budget (OMB) defines a metropolitan statistical area (MSA) as a core based statistical area having at least one urbanized area of 50,000 or more population, plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties. With regard to the 2017 and earlier data used in this study, the Grand Rapids-Wyoming MSA includes Kent, Ottawa, Montcalm, and Barry County. In September 2018, OMB announced the following for 2019: Name Change: Grand Rapids-Wyoming, MI changed to Grand Rapids-Kentwood, MI (MSA 24340, consisting of Ionia County, Kent County, Montcalm County, Ottawa County).

⁵ US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

Figure 1-1. Regional Context Map

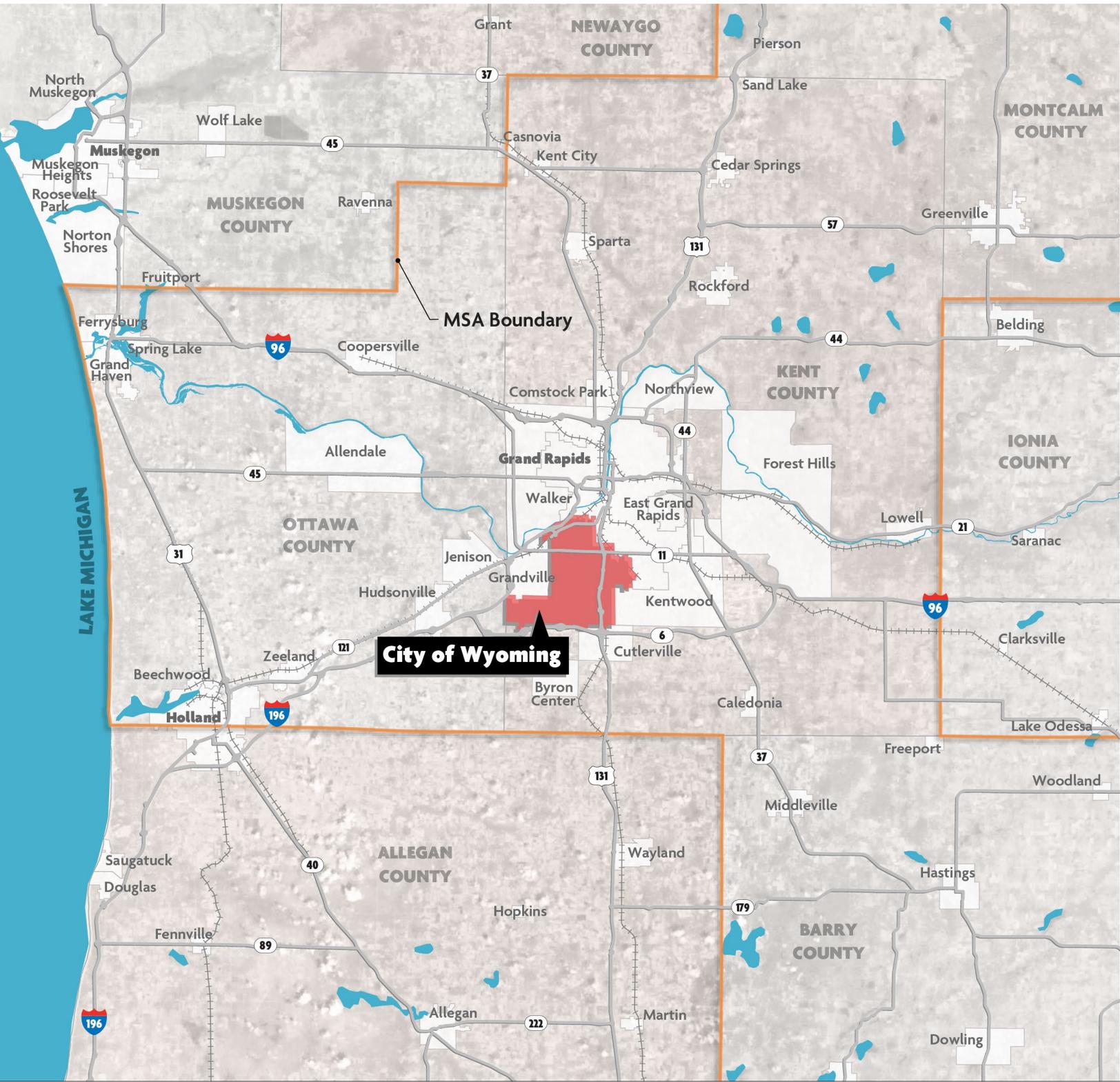


Figure 1-1 illustrates Wyoming, MI within the Grand Rapids-Wyoming MSA and west Michigan.

Demographic Characteristics

Variations found among census tracts illustrate unique characteristics by area, with minority populations ranging from less than 13% to almost 60%, across census tracts, and four tracts approaching or exceeding minority populations of one in two residents. In some tracts, non-family households are far more represented than families, reflecting large numbers of apartments and renters, and significantly fewer owner-occupied housing units. Income levels are similarly varied by tract, with poverty levels ranging from just over 8% to nearly 27%, or more than one in four residents of some tracts living in poverty as defined by federal guidelines.⁶ (See Section 4: Socio-Economic Context.)

Education

Wyoming's seven school districts serve somewhat of a neighborhood function, grouping residents, particularly families with children, by geographic boundaries and district characteristics. While not all listed districts lie entirely within the city, residents' children are represented in the following public K–12 districts:

- Wyoming Public Schools;
- Godwin Heights Public Schools;
- Godfrey-Lee Public Schools;
- Grandville Public Schools;
- Kelloggsville Public Schools;
- Kentwood Public Schools; and
- Byron Center Public Schools.

Private schools, mostly of a religious nature and offering various grade levels, are also an option for Wyoming families:

- St. John Vianney Elementary;
- Holy Trinity Evangelical Lutheran School;
- San Juan Diego Academy;
- West Michigan Lutheran High School;
- Anchorpoint Christian Schools; and
- The Potter's House.

⁶ US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

Figure 1-2. School Districts

- Byron Center Public Schools
- Godfrey-Lee Public Schools
- Godwin Heights Public Schools
- Grandville Public Schools
- Kelloggsville Public Schools
- Kentwood Public Schools
- Wyoming Public Schools

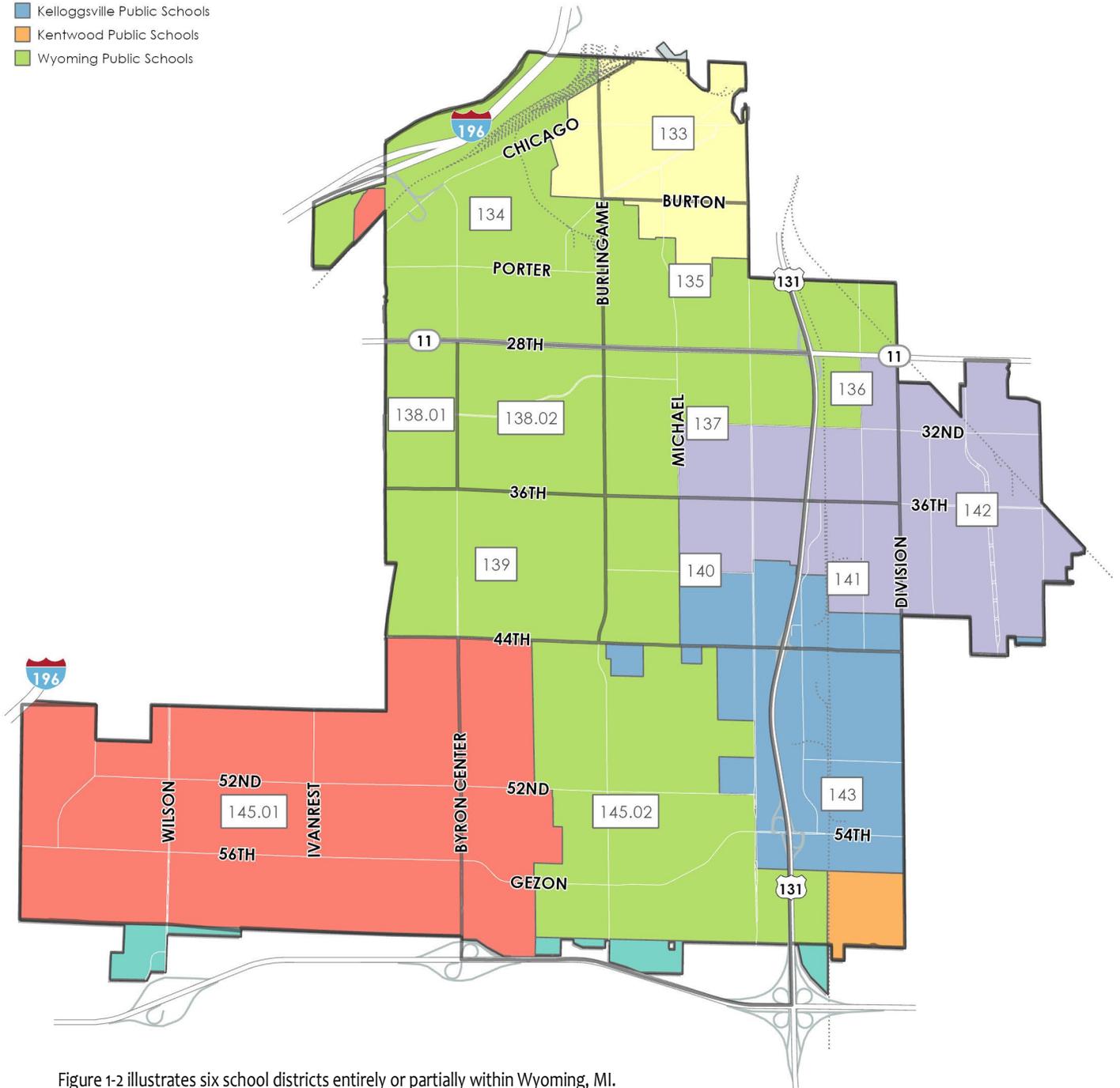


Figure 1-2 illustrates six school districts entirely or partially within Wyoming, MI.

Source: City of Wyoming Recreation Plan 2013-2017

Public Parks

Wyoming has many public parks with athletic facilities, playgrounds, picnic areas, and other features, including the following:

- **Battjes Park** features a U-shaped lake that can be used for kayaking and fishing. The park has a paved walking trail that connects to two fishing piers. Other features include a basketball court, sand volleyball court, playscape, picnic shelter, restrooms, and baseball diamond;
- **Charles Lemery Park** is located east of Byron Center Avenue. Amenities include tennis and basketball courts and ball fields, along with a playground;
- **Frog Hollow Park** and **Gezon Park** are located near Metro Health Village. Frog Hollow Park has a large playground and a small picnic shelter. Gezon Park is home to several baseball diamonds, basketball courts, and walking trails;
- **Lamar Park** hosts baseball and softball games during the summer and soccer games in the fall. The park features a large shelter and two large playgrounds, and a splash pad. A paved trail is located on the west edge of the park;
- **Hillcroft Park** is a long narrow park, accessible from 32nd Street. A soccer field is located at the front of the park. A playground, picnic shelter, and restrooms are located a short distance from the parking lot. The Inter Urban Trail route passes through the east side of the park;
- **Ideal Park** is a scenic park with a section of Buck Creek and a short, paved trail connecting portions of the park;
- **Kelloggsville Park** is south of 50th Street and features a picnic shelter, tennis court, basketball court, and playground. The Inter Urban Trail is accessible on the east side of the park;
- **Lions Park** and **40th Street Park** feature undeveloped open areas;
- **Palmer Field** is used during the summer for softball games;
- **Pinery Park** hosts little league games during the summer and has several baseball/softball fields. The park features a sledding hill on the southeast corner, and playgrounds, picnic areas, a tennis court, and basketball court, fitness trail, and a pickle ball court; and
- **Ferrand Park, Oriole Park, Prairie Park, Tilma Nature Preserve, Buck Creek Nature Preserve, and Marquette Park** are also located in Wyoming.

Amenities

Two of Wyoming's most popular amenities are the Wyoming Senior Center and its library, the Wyoming Branch of the Kent District Library system.

Wyoming Senior Center

The Wyoming Senior Center is located at 2380 DeHoop Avenue SW, and describes itself on its Facebook page as “More than a place; it’s a community where we bring together many of the things that make a healthy lifestyle – a comfortable place to hang out with friends, meet people who share your interests, try new things that exercise your body and your mind, and have some fun.” The Center features over 200 programs annually, with more than 50,000 participants.

Wyoming Public Library

The Library, owned and maintained by the City of Wyoming and operated by the Kent District Library system, is located at 3350 Michael SW and is accessible by The Rapid's Route 16. The Wyoming library has occupied several sites since its humble beginnings as a storefront library in the 1940s. Now located just south of 28th Street, the library was expanded and renovated in 2001 and currently covers almost 49,000 square feet, making it the largest branch in the Kent District Library system. Amenities include:

- Wireless internet;
- Public computers with internet, word processing and other software;
- Color copier/Fax kiosk;
- KDLville early literacy play space;
- Teen space;
- Seven quiet study/reading rooms;
- Quiet reading room with fireplace;
- Wyoming Historical Commission local history room;
- Community meeting room;
- Ongoing used book sale area;
- Art gallery; and
- Special collection.

Section 2. Transportation & Employment

On May 2, 2019, the City of Wyoming hosted a Community Workshop at the Wyoming Library as part of the ongoing planning process for the **Wyoming [re]Imagined Master Plan**, including this analysis. Approximately 40 community members attended, providing feedback on strengths, issues, and opportunities within Wyoming; noting improvements they would like to see undertaken; and discussing their long-term vision for the community. (See Appendix: Community Workshop May 2, 2019)

Regarding mobility & transportation, community members cited worsening traffic congestion, particularly along US-131, M-6, and 54th Street, as a common concern. Participants also expressed the desire to decrease traffic speeds and to install additional signalized crossings along 28th Street to strengthen pedestrian safety and comfort.

There was a strong desire among participants to increase walkability in neighborhoods and provide better bicycle and pedestrian infrastructure, including a more integrated and complete network of bike paths and pedestrian trails. Participants specifically highlighted the need for better east-west connections to the Kent Trails system (including from Lemery Park), and an improved bicycle path to travel across the US-131 and M-6 corridors.

Transportation costs matter to home seekers, especially as rising housing costs pressure household budgets, and both owners and renters begin to consider the combined cost of housing and transportation when evaluating affordability among housing choices. For workers, the time and cost of commuting to employment is usually a monthly expense factor. Seniors and others often can avoid the daily job commute but are similarly attracted to housing that offers easy access to amenities such as grocery and drug stores, health care and other services, libraries and recreation centers.

Housing & Transportation Index

The Housing + Transportation Affordability Index (H+T Index) is a national information source provided by the Center for Neighborhood Technology (CNT), focusing on affordability and location efficiency in a contemporary presentation of housing and transportation data, available from regional down to neighborhood levels. By taking into account the cost of housing as well as the cost of transportation, the H+T Index provides a more comprehensive understanding of the affordability of place than measuring housing cost alone.

The Index demonstrates that transportation costs vary between and within regions depending on neighborhood characteristics:

- People who live in location-efficient neighborhoods—compact, mixed-use, and with convenient access to jobs, services, transit and amenities—tend to have lower transportation costs.
- People who live in location-inefficient places—less dense areas that require automobiles for most trips—are more likely to have higher transportation costs.

The traditional measure of affordability recommends that housing cost no more than 30% of household income.⁷ Using this measure alone, a little over half (55%) of the 220,000 US neighborhoods evaluated by CNT are considered “affordable” for the typical household in 2017. However, that benchmark fails to take into account transportation costs, which are typically a household’s second-largest expenditure. The H+T Index offers an expanded view of affordability, one that combines housing and transportation costs and sets the benchmark at no more than 45% of household income.

⁷ US Department of Housing & Urban Development, HUD.gov; Affordable Housing

When transportation costs are factored into the equation, the number of affordable neighborhoods nationwide drops to 26%, resulting in a net loss of 59,768 neighborhoods that Americans can truly afford. The key finding from the H+T Index is that household transportation costs are highly correlated with urban environment characteristics, when controlling for household characteristics.

Table 2-1. Housing + Transportation Index – Wyoming MI, 2017

	H+T: Typical	H+T: Moderate	H-Cost Typical	H-Cost: Moderate	T-Cost: Typical %	T-Cost: Moderate %	T-Cost: Typical Household Cost AMI	T-Cost: Moderate Household
Wyoming	46	54	22	27	24	26	12,689	11,258

NOTE:

T-Cost = annual transportation cost for the regional typical / moderate household

H-Cost = annual housing cost for the region typical/moderate household

Source: Center for Neighborhood Technology website, H+T Index 2017 Update, 2015 American Community Survey (ACS) data

Data from the CNT for Wyoming describes a “Regional Typical” household as having annual income of \$53,780 and 1.21 workers. According to their analysis, and using an average annual housing cost of \$11,808, 91% of 27,478 Wyoming households pay from 16% to 30% of their annual income for housing costs (78.9% of households pay from 16-24% of annual income; 12.1% pay 24-30%).

For the same households, the CNT uses an annual transportation cost of \$12,689, and identifies 92.2% as households paying from 18% to 26% of their annual income for transportation (17.2% pay from 18%-22% of annual income; 75% pay from 22%-26% of annual income).

Wyoming’s location efficiency score reflects the combination of overall housing cost scores (22 for a typical household), and transportation costs in the same range at 24, due in part to relatively short workforce commute times along with public transit availability. Wyoming workers average a 20 to 22-minute work commute according to ACS 2017 data, mostly on a daily basis through a typical workweek. About 97% of those commutes are by car. The quality of the transportation infrastructure as well as the public transportation available, contribute to the mid-level H+T Index score.

Combining housing and transportation costs, Wyoming enjoys an H+T (Housing + Transportation) Index score of 46 for typical households, only one point higher than the Center’s recommended affordability score of 45, or 45% of household income. Its relatively good location efficiency score helps to support Wyoming’s desirability as a popular housing choice for those households noted in the table above as “Typical” (at area median income), and “Moderate” (80% of area median income).

Although the price of housing has increased in recent years, CNT describes combined housing and transportation costs at less than or at 46% of monthly income for more than nine out of 10 Wyoming households at the median MSA income level and above. The H+T index is less attractive for Wyoming households at 80% of the median income, with the housing score of 27 and the transportation score of 26 pushing the moderate score to a rounded total of 54, a figure 20% higher than recommended.

Figure 2-1. Roadway Classification

- Interstate
- Other Freeway
- Other Principal Arterial
- Minor Arterial
- Collector
- Local Road
- Ramp

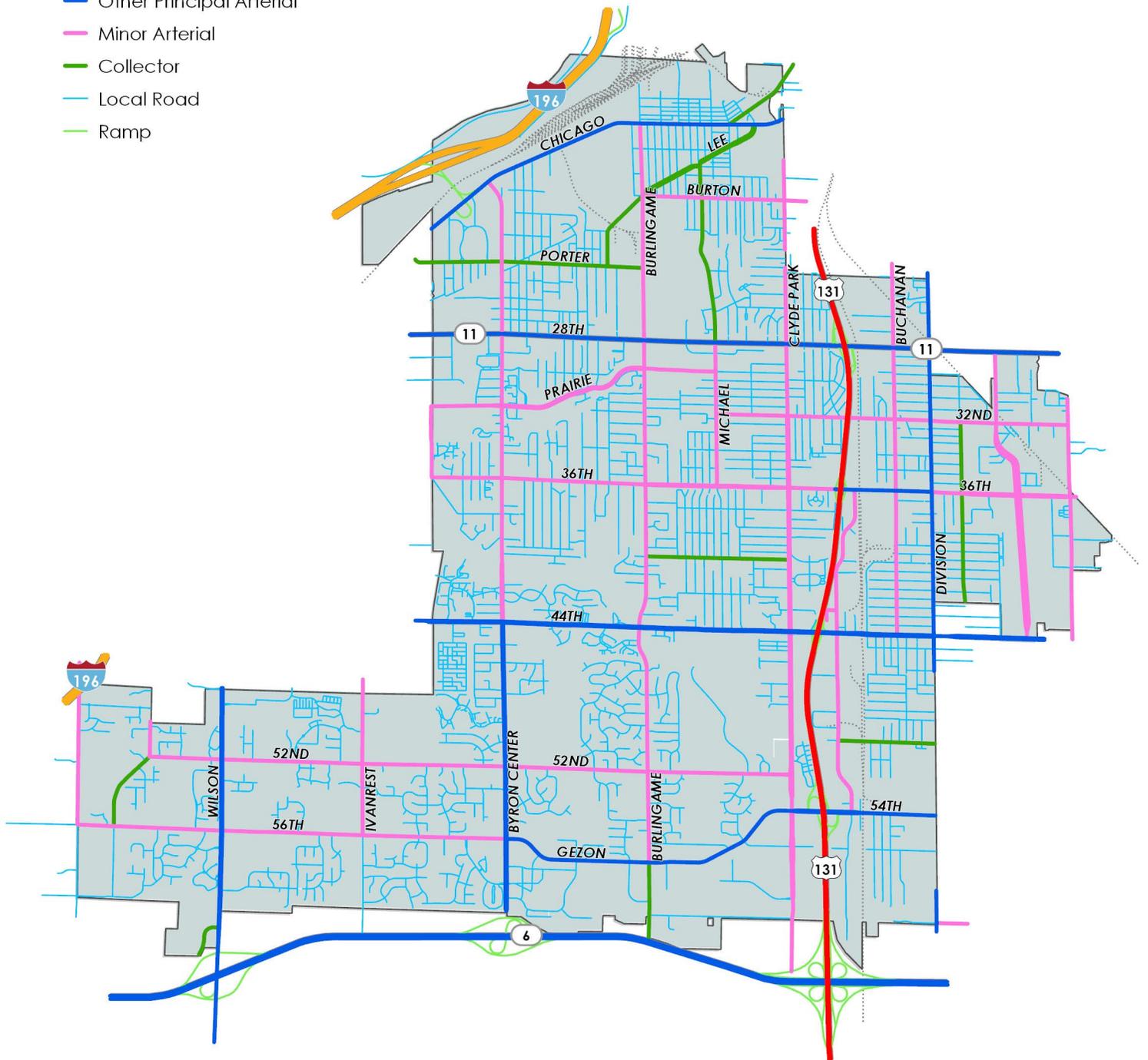


Figure 2-1 illustrates roadway locations and classifications in Wyoming, MI.

Roadway Network

The Wyoming area is crisscrossed by several main routes moving traffic east-west and north-south. Burton Street SW, 28th Street SW, 44th Street SW and the Gezon Parkway are popular east-west routes. Main roads Division Avenue, Clyde Park Avenue SW, Burlingame Avenue SW, Byron Center Avenue SW, Ivanrest Avenue SW and Wilson Avenue SW serve as thoroughfares traveling north and south.

Three highways: US-131, I-196, and M-6 run along the east, north/west and south borders respectively. US-131 is the metropolitan area's primary north-south artery. I-196 runs along the Grand River in the northwest corner of Wyoming with limited access through Wyoming. The M-6 highway is a busy thoroughfare bordering Wyoming south of the Metro Health complex and nearby commercial and residential areas, providing east-west access and allowing drivers to bypass the more congested downtown Grand Rapids portion of I-196.

Sidewalks and Trails

Sidewalks and trails are an important quality of life consideration, particularly as they run through and near residential neighborhoods. Often considered as amenities focused only toward pedestrians and bike riders, the presence and quality of such infrastructure may also tend to increase a neighborhood's appeal to developers⁸ and home seekers and contribute to property values, to the benefit of the entire community.

According to *The Health Benefits of Small Parks and Green Spaces*, "Parks are emerging as important public health solutions in urban communities. Nearly 40 years of research evidence confirms that nearby nature, including parks, gardens, the urban forest and green spaces, support human health and wellness. ... The mere presence of landscape or trees appears to promote community connections. Views of green space from homes are linked to greater perceptions of well-being and neighborhood satisfaction. Public housing residents reported feeling safer if their development had well-maintained landscaping, including trees and grass. Greener public housing neighborhoods tend to be safer, with fewer incivilities and less reported crimes."⁹

A portion of Wyoming's sidewalk development is supported by a separate, dedicated millage. Wyoming has 362 miles of sidewalks (all plowed), 36 miles of non-motorized trails, and four miles of park area trails.

⁸ Private and Non-profit Developers Meeting, June 5, 2019; Comments

⁹ National Recreation and Parks Association: *The Health benefits of Small Parks and Green Spaces*, Kathleen L. Wolf, Ph.D.; Parks & Recreation, April 2017.

Figure 2-2.
Trails and Non-Motorized Paths

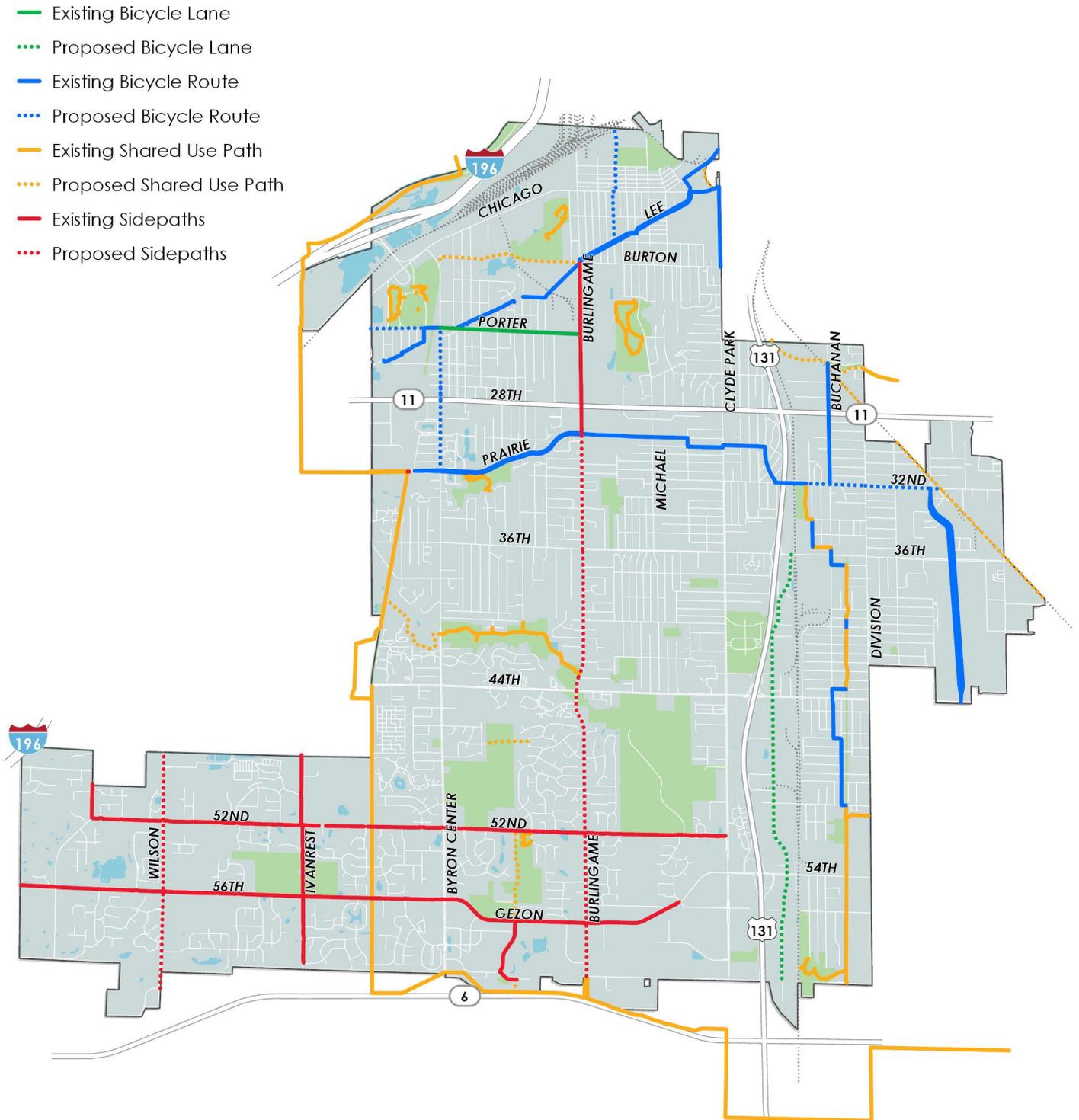


Figure 2-2 illustrates the location and type of trails and paths in Wyoming, MI.

Local trails include the following:

- **Inter-Urban Trail** - Starting near 60th Street, west of Division Avenue, this trail is a combination of paved trails and bike routes. The path passes through residential areas, through Hillcroft Park and Kelloggsville Park, and near local shops and eateries. The bike route section along Prairie Parkway SW connects to Kent Trails just west of Byron Center Avenue SW. In areas where there are bike lanes for cyclists, walkers and joggers can use the sidewalks.
- **Kent Trails** - Stretching from Byron Center to the John Ball Park area of Grand Rapids, Kent Trails is one of the longest trails in the area, with a section of the Kent Trails passing through Wyoming.
- **Fred Meijer M-6 Trail** - The recreational trail follows the route of the M-6 expressway, and a portion of the trail passes through Wyoming.
- **Buck Creek Nature Preserve Trail** - The paved trail borders Buck Creek, passing through wooded areas, and ends at Charles Lemery Park, near Byron Center Avenue SW.
- **East-West Trail** - The paved trails start on the east side of Division Avenue, just north of 52nd Street. The trail goes east into Kentwood, crossing Eastern Avenue SE and Kalamazoo Avenue SE, connecting with the Paul Henry Thornapple Trail.
- **52nd Street Trail** - A paved trail on the north side of 52nd Street SW starts at Clyde Park Avenue SW and goes west beyond Ivanrest Avenue SW. West of Byron Center Avenue SW, the trail connects to Kent Trails. The 52nd Street Trail connects to a paved path on the west edge of Palmer Park, which goes north to 44th Street SW.

Public Transit

The City of Wyoming is a participant in the Interurban Transit Partnership (ITP) through resident approval of transit taxes. Wyoming is served by ITP's The Rapid, which features 10 bus routes to and through the city. Three of those routes are crosstown east-west routes, along Burton Street, 28th Street, and 44th Street. The balance of routes move around Wyoming in generally a north-south direction, with Route 8 turning west toward neighboring Grandville, and Route 16 reaching the south city line and the Metro Health Campus and adjacent commercial and housing areas.

The Rapid offers a variety of tickets and fares, from \$0.85 for seniors to adult single fare tickets of \$1.75 to unlimited 31-day passes for \$30.00 and \$47.00 respectively. Single day and 7-day passes are also available, and 10-ride student passes are available for \$10.50.

The Wyoming website offers the following information about its Older Adult Transportation Assistance Program:

The Wyoming Senior Center offers a Discounted Go-Bus! Ticket Program as a result of grants provided by the Area Agency on Aging and the Kent County Senior Millage. Go-Bus! is a transportation service provided through the Interurban Transit Partnership (ITP) specifically for the elderly or disabled. Go-Bus! provides door-to-door service for people who can no longer manage public transit routes. Through these grants, we are able to provide 10, 20 or 30 tickets per month at a suggested donation of \$1.50 each. The Wyoming Senior Center is able to offer these discounted tickets to anyone 60+ living in Kent County.

Figure 2-3. Transit System

- Bus Stops
- 28th Street Crosstown
- 44th Street Crosstown
- Burton Crosstown
- Clyde Park
- Division
- Eastern
- Grandville/Rivertown
- Madison
- Silverline
- Wyoming/Metro Health



Figure 2-3 illustrates routes of The Rapid, a public transit system of the Interurban Transit Partnership serving Wyoming, MI.

The Rapid offers various additional services including the Go! Bus, a door-to-door transportation for seniors age 65+ and persons with disabilities who cannot ride on a fixed route bus. Go-Bus riders share trips if they are generally traveling in the same directions at the same times. Trips are scheduled in advance without regard to the purpose of the trip. Go Bus! tickets are available online at \$35 or less. The Rapid also assists with arranging car, bike, or vanpools for riders, and participates in RideLink, a network of area transportation providers offering transportation to persons 60 and older to necessary destinations including shopping and medical and recreational visits.

Silver Line

The Silver Line, The Rapid's Route 1, is Michigan's first bus rapid transit (BRT) system, connecting Grand Rapids, Kentwood, and Wyoming commuters north and south along the Division Avenue Corridor. The Silver Line is a 9.6-mile connector, extending from downtown Grand Rapids south to 60th Street, operating from approximately 5:00AM to midnight.

At its launch in 2014, the Silver Line was designed to appeal to commuters, offering easy access from the south to the urban core of Grand Rapids Medical Mile and downtown employment. Since that time, the anticipated economic development along the corridor has essentially failed to materialize. According to MiBiz, "Since the launch of the approximately \$40 million Silver Line, only a handful of fast food restaurants and other small businesses have opened along the Division Avenue corridor between Wealthy Street and 28th Street. Transit, planning and development sources differ in their explanations for the lack of activity, citing a combination of stakeholders working in silos, general market forces and the corridor simply being less than ready for dense development."¹⁰

At the time of this report, Wyoming is participating along with Kentwood and Grand Rapids in a major planning study funded by the Federal Transportation Administration, the Michigan Department of Transportation, and each of the cities involved to identify strategies to spur development along the route. According to Wyoming's municipal website, the northern end the Silver Line runs into the core of Grand Rapids, where about \$2 billion in investments has occurred in that city's Medical Mile. The Division Avenue corridor at the southern end of the line (mostly in Wyoming) has the highest total population, greatest density and most transit-dependent residents compared with other routes, offering significant potential development opportunities.¹¹

¹⁰ MiBiz, May 13, 2018; "After four years, development still slow along GR's Silver Line bus route," Nick Manes

¹¹ City of Wyoming website, December 20, 2018; \$696 Federal Grant to Help Spur Economic Development Along The Rapid's Silver Line route

Employment

Wyoming’s most recent Comprehensive Annual Financial Report 2018 (CFAR) shows the largest employers in Wyoming, their business, and the number of people employed (Table 2-2). Employment opportunity is most available along the US-131 corridor and Gezon Parkway. The two largest employers, Metro Health: University of Michigan and Gordon Food Service, are both located in the southern portion of Wyoming and together account for more than 10% (4,600) of the total 39,000 employees in the Wyoming workforce.¹²

This study does not identify transportation or employment, or the connections between those key community factors, as impediments to housing choice in Wyoming. Transportation is relatively convenient throughout the city, featuring short commutes and a desirable location efficiency score for households at or above the area median income. Pedestrian and bike travel for reasons of employment, education, services and recreation are focused public investments, and add to the quality and accessibility of Wyoming’s housing market. The most recent demographics available demonstrate the city’s high employment rate.¹³ The presence of regional firms and services, particularly Metro Heath and Gordon Foods, adds stability to Wyoming’s economy. Public employment through the City of Wyoming and several area school districts are key components of the community’s economy.

Table 2-2. Largest Wyoming Employers, 2019

Employer	Industry	No. of Employees
Gordon Food Service	Wholesale/Distribution	2,500
Metro Health Hospital	Healthcare	2,100
United Parcel Service	Delivery	1,346
General Motors	Manufacturing - Transportation	830
Michigan Turkey Producers	Manufacturing - Food	780
Undercar Products Group Inc	Manufacturing – Plastics & Rubber	700
Benteler Automotive	Manufacturing – Transportation	700
Booking.com	Call Center	574
Consumers Energy	Energy	527
Kellogg’s Snacks	Manufacturing – Food	500
Advantage Solutions	Consulting Firm	450
Wyoming Public Schools	Education	500
Country Fresh	Manufacturing – Food	400
City of Wyoming	Government Services	345

Source: City of Wyoming, CFAR 2018, and The Right Place 2019

¹² City of Wyoming Consolidated Financial Annual report 2018; The Right Place 2019

¹³ US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

Section 3. Background: Analysis of Impediments to Fair Housing Choice

In accordance with HUD guidelines, Wyoming has completed an Analysis of Impediments in 2002, and most recently in 2013. Key findings of the 2013 analysis are included in this report.

As a requirement of receiving funds through the Community Development Block Grant Program (CDBG) and HOME Investment Partnerships (HOME), jurisdictions periodically submit certification of affirmatively furthering fair housing (AFFH) to the US Department of Housing & Urban Development (HUD). Three elements are included:

- Complete an Analysis of Impediments to Fair Housing Choice (AI);
- Act to overcome the effects of any impediments identified; and
- Maintain records reflecting the actions taken.

Impediments to fair housing choice are defined at pages 2 to 8 of HUD's most recent *Fair Housing Planning Guide* as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; and
- Any actions, omissions, or decisions which have the effect of [such restriction].

In the context of an AI, an impediment to fair housing can be an action or a lack of action that restricts housing choice, or that has the effect of restricting housing choice. Some policies or practices might seem neutral, but in fact can deny or limit the availability of housing. According to HUD guidelines, obvious impediments include outright discrimination based on race or ethnicity, refusing to rent to families with children, or insurance practices that reinforce segregated housing patterns. Less obvious impediments include development policies that discourage the construction of properties with more than two bedrooms, inadequate multilingual marketing, zoning that limits group homes, and insufficient public transportation to areas with affordable housing.

The list of categories in the definition above comes from the federal Fair Housing Act. In addition, state and local governments may enact fair housing laws that extend the same protections to other categories or groups. Although the AI is a federally-required report, it generally addresses protected classes added at the state or local level also.

The AI process suggested by HUD involves examination of various data sources related to housing markets, and the dynamics affecting residential housing choices and transactions, particularly for those persons in classes protected by federal, state, and/or local laws.

The process also includes consideration of data solicited from the public through meetings, interviews, stakeholder surveys, and the active review of the AI in draft stages, through presentations regarding key findings, identified impediments, and suggested actions to overcome impediments and broaden housing choice.

AIs are their own separate documents, and the contents are not dictated by HUD although HUD requires that the documents must be available to the public. HUD's *Fair Housing Planning Guide* defines an AI as:

- A comprehensive review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws, regulations, and practices affect the location, availability, and accessibility of housing;

- An assessment of public and private conditions affecting fair housing choice for all protected classes; and
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

The *Guide* explains that analyzing fair housing impediments and taking appropriate actions means:

- Eliminating housing discrimination in the jurisdiction;
- Promoting fair housing choice for all;
- Providing housing opportunities for people of all races, colors, religions, sexes, national origins, disabilities, and family types;
- Promoting housing that is structurally usable by all people, particularly those with disabilities; and
- Fostering compliance with the non-discrimination features of the federal Fair Housing Act.

While jurisdictions are required to complete an AI, they are not required to submit AIs to HUD, and the AI is not a formal component of the Consolidated Plan’s Annual Action Plan or Five-Year Strategy. However, a HUD policy memorandum (September 2004) states that a jurisdiction may (not must) include in its Annual Action Plan the actions it intends to take in the upcoming year to overcome the effects of impediments to fair housing.

Fair Housing Laws

Title VIII of the 1968 Civil Rights Act, commonly known as the *Federal Fair Housing Act*, makes it illegal to discriminate in the purchase, sale, or renting of housing based on one’s race, color, religion, or national origin. Sex was later added as a protected class, and in 1988, the *Fair Housing Amendments Act* added familial status and disability to the list, resulting in a total of seven federally protected classes. Federal fair housing law and policy are largely outlined in three pieces of national legislation:

- Fair Housing Act;
- Fair Housing Amendments Act; and
- Americans with Disabilities Act.

The purpose of fair housing law is to protect one’s right to own, sell, purchase, or rent housing of their choice without discrimination based on a protected characteristic. The goal is to ensure equal access to housing opportunity free from discrimination due to race, color, religion, national origin, sex, familial status and/or disability.

Similar laws exist at the state and local levels.

- In Michigan, the ***Elliott-Larsen Civil Rights Act (Michigan Act 453 of 1976)*** prohibits discrimination throughout the state in the areas of employment, housing, public accommodations, public service, and educational facilities. Protected classes regarding housing are religion, race, color, national origin, sex, familial status, age, and marital status.
- The ***Persons with Disabilities Civil Rights Act (Michigan Act 220 of 1976)*** guarantees the opportunity to obtain employment, housing and other real estate, and full and equal utilization of public accommodations, public services, and educational facilities without discrimination because of a disability. The Act also provides additional rights for persons with disabilities to request and obtain reasonable accommodation and modifications.
- The City of Wyoming has a similar municipal ordinance (Wyoming Code of Ordinances Part II Chapter 42 Article II Div. 2 *Fair Housing*) describing unfair housing practices and outlining a complaint procedure involving the City Manager and City Attorney.

Wyoming's ordinance states in part:

“It is an unfair housing practice for an owner, a real estate broker or real estate salesman, or any other person to perform any of the following:

(1) Refuse to negotiate for a real estate transaction with a person because of race, color, religion, national origin, age, sex, height, weight, handicap, source of income, familial status or marital status.

... (3) Discriminate against a person in the terms, conditions, or privileges of a real estate transaction or in the furnishing of facilities or services in connection therewith because of race, color, religion, national origin, age, sex, height, weight, handicap, source of income, familial status or marital status.”

The ordinance further prohibits several additional actions related to housing purchase, sale, financing, representation of availability, application, terms and conditions, advertising, inquiries and record-keeping, solicitation of listings or sales, force or obstruction, and retaliation.

Wyoming's fair housing ordinance is notable in that it goes beyond both the federal and State of Michigan laws in its list of protected categories, and in the actions specifically described as an unfair housing practice. Enforcement options are less extensive, offering a 30-day period after a suspected discrimination in which to file a complaint with the City Manager. He or she is responsible for investigating the complaint and making a reasonable attempt to conciliate the complaint. If unsuccessful, complaints are forwarded to the City Attorney for handling as a violation. Additional filing of the same complaint with the Michigan Civil Rights Department automatically bars a City of Wyoming complaint.

Why Assess Fair Housing?

Provisions to affirmatively further fair housing are long-standing components of HUD's housing and community development programs. The provisions are taken from Section 808(e)(5) of the *Federal Fair Housing Act*, which requires that the Secretary of HUD administer all federal housing and urban development programs in a manner that affirmatively furthers fair housing. States and local governments, including the City of Wyoming, must certify that they are affirmatively furthering fair housing in their *Consolidated Plans (ConPlans)* and *Public Housing Agency (PHA) Plans*.

Affirmatively Furthering Fair Housing (AFFH) Rule

HUD's AFFH rule, published in the *Federal Register* July 16, 2015, requires local governments to conduct an *Assessment of Fair Housing (AFH)* using an “Assessment Tool” to assist them in meeting their obligation to affirmatively further fair housing. In a subsequent notice (*Federal Register* January 5, 2018), HUD suspended most local governments' obligations to submit an AFH under the AFFH rule. The 2018 suspension effectively postponed implementation of the AFFH rule for most jurisdictions until 2025.

The legal obligation to affirmatively further fair housing continues for all recipient jurisdictions. Their AFFH requirement reverts to the previous protocol of certifying that they are affirmatively furthering fair housing.

In order to comply with this requirement, jurisdictions must have an Analysis of Impediments (AI). The laws that established the Community Development Block Grant (CDBG) program, the Comprehensive Housing Affordability Strategy (CHAS), which is the statutory basis for the ConPlan, and the PHA Plan all require recipient jurisdictions to certify in writing that they are affirmatively furthering fair housing. HUD's 1996 Fair Housing Planning Guide states that the obligation to affirmatively further fair housing applies to all housing and housing-related activities in a jurisdiction, whether publicly or privately financed.¹⁴

¹⁴ US Department of Housing and Urban Development, Fair Housing Planning Guide

Affirmatively furthering fair housing is defined in CDBG and ConPlan regulations as:

- Having an AI to fair housing choice;
- Taking appropriate actions to overcome the effects of impediments; and
- Keeping records reflecting the analysis and showing actions taken.

The regulations for public housing authorities and vouchers are similar.

Having certified their commitment to affirmatively furthering fair housing, HUD suggests that entitlement jurisdictions maintain records to support the certification, including the following:¹⁵

- Prioritized list of actions to overcome the effects of identified impediments with milestones, timetables, and measurable results;
- AI-related actions undertaken;
- Transcripts of public hearings and citizen comments and input;
- Progress reports, which should be kept available for public review;
- Description of the nature and extent of the governing body's commitment to fair housing planning;
- Description of the financial and in-kind support for fair housing planning, such as funds or services provided by the jurisdiction, non-profit organizations, private individuals, colleges, universities, contractors and staff supports; and
- List of groups participating in fair housing planning.

Methodology

The AI process requires a thorough examination of a variety of data related to housing, particularly for persons who are protected under fair housing laws. Sources of information include US Census data, employment and income information, residential mortgage financing data, business lending data, fair housing complaints, and information gathered by surveys and/or interviews from housing industry experts, consumers and other stakeholders, media, and housing-related sources in the public domain.

Relevant information for this AI was obtained through the review of existing data and the collection of experiential, anecdotal, and attitudinal information specific to housing choice in Wyoming. Analysis of collected information included the evaluation of both raw and existing data by objective standards where applicable and appropriate, and subjective analysis of gathered experiences, perceptions, and attitudes.

Baseline quantitative data were drawn from the Census Bureau, including 2000 and 2010 Decennial Census, American Community Survey (ACS) data averages from 2013 through 2017 detailing population, income, and housing characteristics. Additional sources include Home Mortgage Disclosure Act, data from the Consumer Financial Protection Bureau (CFPB) and the Federal Financial Institutions Examination Council (FFIEC), fair housing complaint data obtained from private agencies, federal (HUD and Department of Justice), state (Michigan Department of Civil Rights) and local jurisdictional enforcement as well as federal and state court records.

¹⁵ Ibid Sections 2-2; 2-16

American Community Survey

The American Community Survey (ACS) is a nationwide survey designed to provide communities with reliable and timely social, economic, housing, and demographic data every year. The Census Bureau uses data collected in the ACS to provide estimates on a broad range of population, housing unit, and household characteristics for states, counties, cities, school districts, congressional districts, census tracts, block groups, and many other geographic areas.

The ACS has an annual sample size of about 3.5 million addresses, with survey information collected nearly every day of the year. Data are pooled across a calendar year to produce estimates for that year. As a result, ACS estimates reflect data that have been collected over a period of time rather than for a single point in time as in the decennial census, which is conducted every 10 years and provides population counts as of April 1. Because the ACS is based on a sample, rather than all housing units and people, ACS estimates have a degree of uncertainty associated with them, called sampling error. In general, the larger the sample, the smaller the level of sampling error. To help users understand the impact of sampling error on data reliability, the Census Bureau provides a “margin of error” for each published ACS estimate. The margin of error, combined with the ACS estimate, give users a range of values within which the actual “real-world” value is likely to fall.

Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization. While the 2013-2017 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Home Mortgage Disclosure Act Data

Home Mortgage Disclosure Act of 1975 (HMDA) data was analyzed to identify possible fair housing issues in the home mortgage lending market (see Section 9: Home Mortgage Lending). This federal act was legislated by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities, and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the census tract in which the home is located, and information concerning prospective lender actions related to the loan application.

For this analysis, HMDA data from the years 2011, 2014, and 2017 was analyzed, with the measurement of denial rates by census tract and by race and ethnicity of applicants framing the key research objectives and results. The data was also examined to identify the groups and geographic areas most likely to encounter higher denial rates and lower loan origination rates.

Fair Housing Complaint Data

Housing complaint data was used to analyze discrimination in the renting and selling of housing. HUD provided fair housing complaint data for Kent County, including Wyoming, for the 5-year period 2014 through 2018 (See Section 8: Fair Housing Complaints). This information included the basis, or protected class cited in the complaint; the issue, or prospective discriminatory action; and the closure status of the complaint, or the result of the investigation. The review of fair housing complaints filed with HUD allowed for inspection of certain types of unfair housing practices, and the degree to which complaints were found to be with cause. Analysis of complaint data (see Section 8) focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint due to lack of knowledge regarding fair housing laws and ordinances, lack of

awareness about available enforcement options or how to access the process, or fear of retaliation or similar repercussion affecting one's present or future housing. A similar review was performed on data collected and provided by the US Department of Justice, the Michigan Department of Civil Rights and the Fair Housing Center of West Michigan.

Interviews

Interviews with residents, elected and appointed officials, social service agencies – particularly those addressing housing-related issues, and professionals in real estate, private and non-profit property development, and financial and legal services are an important component of the AI. These interviews have been accomplished in both individual and group settings and are designed to elicit information according to the expertise and practical experience of the individual or group interviewed. (See Appendix: List of Interviews)

With a more specific focus than the **Wyoming [re]Imagined** online survey, the interview structure for the AI was directly focused on fair housing choice and impediments, with questions concerning the following items:

- Their housing related experience or professional context;
- Applicable fair housing laws and ordinances;
 - Are the interviewees familiar with various levels of fair housing law?
 - Can they recognize a potentially discriminatory situation if encountered, or described to them?
 - Do they know where to refer home seekers or residents who need information, assistance, or enforcement options?
- Participation in or knowledge about fair housing activities such as training, market testing, seminars, promotions, or events;
- Awareness of questionable practices or barriers to housing choice related to residential sales, rental, appraising, financing, insurance, or advertising;
 - Narrative description requested about any instances noted;
- Awareness of housing policies or practices limiting persons with disabilities; and
 - Narrative description requested about any instances noted.

The use of open-ended interview questions permitted those being interviewed to talk about any housing-related items of interest to them including substandard housing, application procedures, neighborhood issues, redlining or other limitations, occupancy rules, cost differentials, barriers affecting real estate purchases and attempts, and other potential fair housing issues.

Both private and non-profit developers were asked about their knowledge and their experience with Wyoming's policies, practices and regulations concerning:

- Neighborhood and community development;
- Land use;
- Zoning and permitting;
- Property taxes;
- Residential construction standards;
- Accessibility; and
- Health and safety codes and occupancy standards.

These interviews were designed to identify fair housing issues and opportunities in the topics listed, and also elicit information pertaining to compliance, displacement of individuals and families, perceptions within and regarding specific areas of Wyoming, and the positive and negative aspects of increasing or decreasing the community's housing supply.

Conclusions

Conclusions regarding impediments to fair housing choice in Wyoming were drawn from data and information including qualitative, quantitative, and public participation sources, and are based on the HUD definition of an impediment to fair housing choice as any action, omission, or decision that limits or affects housing choice because of protected category status.

While all the information obtained is taken into consideration, items are identified as impediments only as such items are supported by reliable data sources including citizen comments and participation. Public input is encouraged as a valuable source of community information and resident perceptions but, as with any source, comments by themselves do not necessarily indicate the existence of impediments. In many instances, stakeholder comments reinforce the findings in this analysis through the addition of experience to research.

Community Engagement: Wyoming [re]Imagined Master Plan

Wyoming's Analysis of Impediments is being conducted in conjunction with *Wyoming [re]Imagined*, the development of Wyoming's new Master Plan, scheduled for completion in 2020. Engagement exercises conducted as part of the master plan process were augmented to obtain input regarding housing.

Community Survey

HUD recommends that surveys be conducted during the AI process to gain input from the public regarding perceived impediments to fair housing choice in an area. Along with structured interviews and a series of community meetings, this AI employs a long term, on-line survey instrument to encourage public input in the process.

The survey is available in English and in Spanish, and is designed to solicit information for the AI and the Master Plan process from the broadest possible range of stakeholders. The survey is structured into three separate participation areas for residents, businesses, and Wyoming youth. As a means of informing both processes, the survey addresses a wide variety of issues related to fair housing, and housing market dynamics affecting resident and would be resident choices. As of July 2019, 165 stakeholders had taken advantage of the opportunity to give their opinion and comments, with several providing contact details for follow-up conversations.

Steering Committee

The planning process is anchored by a Master Plan Steering Committee that serves as a sounding board of the community and is asked to review deliverables and vet plan concepts. Membership represents a range of backgrounds and connections to the community, including residents, government, and representatives from schools, businesses, transportation, private and non-profit housing developers and human service organizations. The Committee will meet at key points along the process to discuss issues and overall planning direction, and to provide feedback for Planning Commission and City Council's consideration. The Steering Committee will be asked to approve the draft plan prior to engaging in the formal public hearing and adoption process. The final draft AI is further reviewed by the City's CDBG citizen committee.

The Steering Committee met on April 23, 2019 and identified various issues to be addressed in the process ahead (See Appendix: Steering Committee Meeting April 23, 2019). Key issues to be considered in this analysis were:

- Lack of affordable housing;
- Accessible housing supply to meet demand; and
- Maintenance of housing stock.

Issues related to housing impediments also included:

- Lack of diversity in decision-making bodies, both public and corporate;
- Lack of promotion of diverse opportunities;
- Representative community buy-in;
- Division Avenue Corridor revitalization;
- Vacant and under-utilized commercial and industrial properties; and
- Potential to encourage incentives for mixed-use commercial and residential development.

The Steering Committee identified accessible and affordable housing stock as their top priority.

Housing Stock

The lack of quality, affordable, and accessible housing was the top issue identified by Steering Committee members. Comments highlighted a need for workforce housing that is affordable to low- and middle-income wage earners, and that is proximate to their employment (i.e.; reduce travel time and commuting costs). In addition, Steering Committee members discussed the need for senior housing, and to maintain the overall quality of Wyoming's existing housing stock.

The importance of community diversity was noted in relation to Wyoming's identity. Steering Committee members identified the city's diverse population as a key strength but emphasized a need for further engagement to ensure community participation is representative of the City's demographics. This expanded to a desire to see broader community representation and increased diversity within City government as well as in the employee makeup of corporate citizens and partner organizations.

Steering Committee members indicated specific projects or actions they would like to see occur in Wyoming. One project identified by the Steering Committee was to develop affordable and quality housing for residents that represent a mix of socioeconomic statuses, cultures, and ethnicities.

Community Meeting

Several residents attended the first in a series of community workshops in May 2019 as part of the ongoing planning process for the **Wyoming [re]Imagined Master Plan**. Approximately 40 community members provided feedback on strengths, issues, and opportunities within Wyoming, improvements they would like to see undertaken, and their long-term vision for the community. (See Appendix: Community Workshop May 2, 2019)

Top Issues & Concerns

Community members attending the May 2019 workshop labeled housing as their top concern through a show of hands. The most pressing issue discussed was the need for affordable housing to counteract increasing housing costs. Multiple participants shared the need for affordable owner-occupied homes for all income levels. The need for additional mixed-use apartments to meet housing demand was also identified, with some participants noting that many single-family homes are being rented.

Other items discussed included issues with property maintenance related to absentee property owners, the concentration of rental properties in certain areas, the need for stricter rental code enforcement, and the need for additional senior housing and community centers in response to an aging population.

Based on the limited amount of community outreach at this early point in the master planning process, the community's high interest in housing supply and the affordability of that housing for a wide range of households is clear. Some comments indicated unfavorable perceptions of the term "affordable housing" as an item that might bring down property values and neighborhood quality of life where such housing is developed.

This AI contains information about Wyoming's households in terms of their employment, income and housing costs, and offers brief comments regarding the danger of confusing affordable housing with undesirable housing, and thereby imputing negative values to what may actually represent a realistic housing supply. It is important that Wyoming recognizes the tendency to equate behavior and quality of life with affordability, and takes clear and intentional steps in this planning process to promote attitudes that reflect accurate information about fact-based costs and impacts on the community's households, and the attractiveness of a diverse community.

Comments by the Steering Committee and community workshop participants listed diversity as a Wyoming value, and encouraged the promotion of a diverse city in the development of a new master plan. Specifically, those involved called on the City to represent Wyoming's diversity on the Boards and Commissions responsible for advice and decision-making on local matters.

Presently, demographic information regarding board and commission members is not collected by the City as residents and others volunteer to be appointed to various boards and committees. Collecting and publishing such data was suggested in the City's 2013 AI. By requesting this information in online application forms and analyzing the makeup of the groups, Wyoming can track its success in representing diverse elements of its population and offer assurance of that representation in a public way. A list of Members of Boards, Commissions and Committees is attached along with a map detailing the residency or business location of their members throughout Wyoming.¹⁶

¹⁶ Several members are listed by the City of Wyoming address at 1155 28th Street SW, denoting their status as an official City representative in accordance with rules governing the composition of certain bodies.

Section 4. Socio-Economic Context

This section presents demographic, economic, and housing information collected from the US Census Bureau and the annual American Community Survey (ACS) 5-year Estimates, the Federal Financial Institutions Examination Council (FFIEC), the Consumer Financial Protection Bureau (CFPB) and other sources. Several socio-economic characteristics were examined at various geographic levels including the Grand Rapids-Wyoming Metropolitan Statistical Area (MSA) which covers Kent County, Barry County, Montcalm County, and Ottawa County¹⁷, and Wyoming itself. Information describes population and growth, race, ethnicity, disability, income, and housing information. Characteristics are provided in the following tables and maps and, where available, are also presented by the 14 local census tracts, numbering 133 through 145.02, which make up Wyoming. Taken together, this information illustrates the fundamental dynamics affecting Wyoming’s residents, housing market behavior, and the conditions surrounding housing choice in Wyoming.

ACS data covers items similar to the decennial Census counts, and also various items such as household income and poverty that do not appear in the decennial Census. Basically, the ACS differs from the Census in that it represents a one, three or five-year average of annual data estimates as opposed to a point-in-time actual count. The data presented here, generally ranging from 2011 to 2017, is not comparable to the decennial Census due to not accounting for some population groups such as the homeless, and because the estimates are based on samples rather than actual population counts. ACS percentage distributions, however, can be compared to distributions from the 2010 Census.

Demographics

Population and demographic data are included as background in this review to describe the residents of Wyoming, and their context within the Grand Rapids-Wyoming Metropolitan Statistical Area (MSA). Analysis of the information, particularly with regard to race and ethnicity, can help to identify concentrations of protected and or minority populations, and their locations. Such concentrations do not necessarily indicate the existence of impediments to one’s choice of housing but are of interest in the overall examination of housing and market dynamics.

Table 4-1 presents population counts in three-year intervals for the Grand Rapids-Wyoming MSA, Kent County, and the city of Wyoming. The years described were chosen because the City’s previous *Analysis of Impediments to Fair Housing Choice*, completed in 2013, was based on 2010 US Census and 2011 ACS data. The 2011 year, therefore, offers a practical starting point for this analysis as a continuation of Wyoming’s interest in the housing market and its impact on residents and would-be residents.

¹⁷ MSA Name Change for 2019 FFIEC Census File: Name Change: Grand Rapids-Wyoming, MI changed to Grand Rapids-Kentwood, MI (MSA 24340, consisting of Ionia County, Kent County, Montcalm County, Ottawa County). OMB; September 2018.

Table 4-1. Population and Change, Grand Rapids-Wyoming MSA, Kent County, Wyoming MI, 2011 - 2014 - 2017

Area	2011	2014	2011-2014		2017	2014-2017	
			Change	% Change		Change	% Change
Grand Rapids-Wyoming MSA	996,006	1,421,374	425,368	42.7%*	1,456,935	35,561	2.5%
Kent County	602,046	629,327	27,281	4.5%	648,594	19,267	3.1%
Wyoming	72,100	73,434	1,334	1.9%	75,124	1,690	2.3%

* Change in MSA geography

Source: US Census American Community Survey (ACS) 2011, 2014, 2017 5-year Estimates

Figure 4-1. Population by Census Tract

- 3,200 People or Less
- 3,201-5,500 People
- 5,501-7,000 People
- 7,001-10,800 People

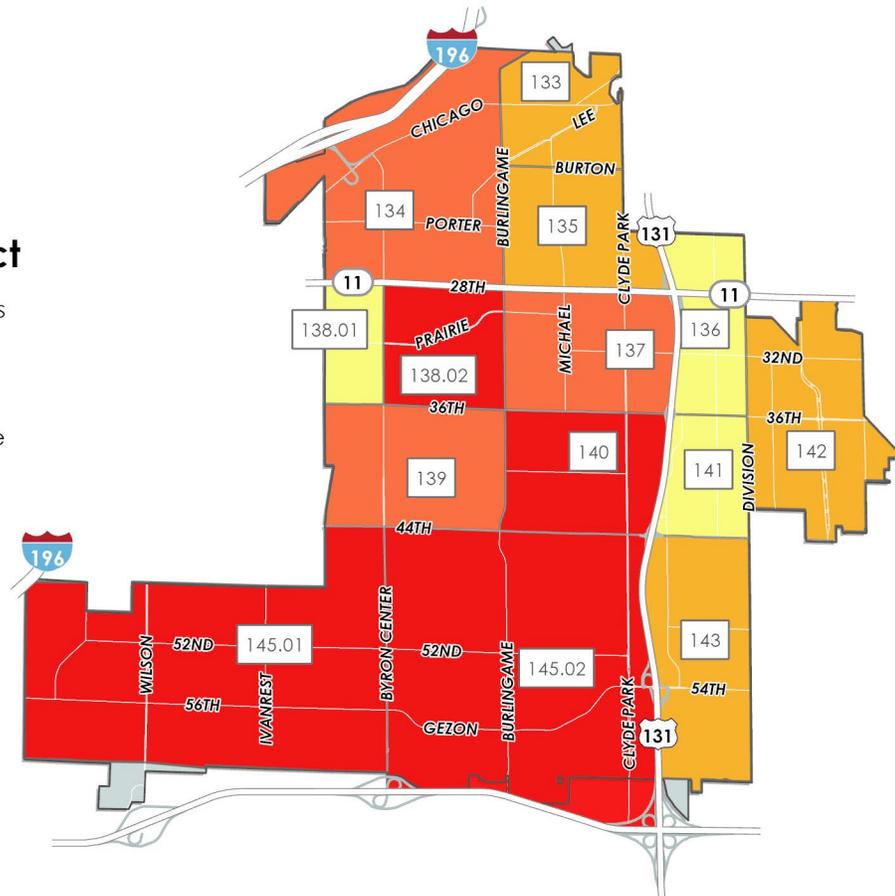


Figure 4-1 illustrates the population levels of Wyoming, MI census tracts.

Employment

Wyoming's location in western Michigan has enabled it to share in the benefits of an area experiencing population and economic growth following the Great Recession of 2008. The metropolitan region including Kent, Ottawa, Barry, and Montcalm counties is cited in 2017 as the best economic growth region in the state¹⁸, powered by a growing manufacturing sector. The Kent County area accounts for a significant portion of the region's population growth, adding 46,548 residents in the period from 2011 – 2017 for a growth rate of 7.73%. Wyoming makes up nearly 12% of the county's population and is capturing a substantial portion of the county's increase, growing 4.19% over the same period with an additional 3,024 residents. Population data covering the entire MSA is skewed due to a change in regional geography between 2011 and 2014 and is not used for comparison purposes here. Wyoming's 2014-2017 growth rate of 2.30% is comparable to the MSA's rate of 2.50% over the same period, and is indication that Wyoming is sharing in the regional recovery.

Table 4-2. Regional and Local Economy, Grand Rapids-Wyoming MSA, Kent County, Wyoming MI, 2014 and 2017

	Grand Rapids-Wyoming MSA		Kent County		Wyoming	
	2014	2017	2014	2017	2014	2017
In Labor Force	67.1%	67.3%	68.5%	68.6%	72.7%	71.6%
With Earnings	79.6%	80.0%	80.1%	81.1%	82.8%	83.7%
Per Capita	\$25,786	\$28,739	\$26,436	\$29,433	\$21,379	\$24,115
Median Household Income	\$53,187	\$58,094	\$52,716	\$57,032	\$46,672	\$50,971
Mean Household Income	\$68,567	\$76,101	\$69,172	\$77,100	\$56,284	\$62,954
Median Family Income	\$64,356	\$70,384	\$64,487	\$70,224	\$55,009	\$58,468
Mean Family Income	\$80,197	\$88,999	\$81,902	\$91,025	\$64,595	\$70,060
In Poverty	14.2%	12.4%	16.0%	13.4%	16.4%	15.5%
In Poverty < 18 years age	19.0%	15.8%	21.4%	17.5%	22.5%	22.1%
In Poverty >65 years age	6.5%	6.6%	7.1%	7.5%	10.2%	7.3%
With SNAP benefits in past 12 months	15.9%	11.3%	14.3%	12.7%	17.5%	16.7%

Source: US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

Economic data from 2014 and 2017 ACS 5-year estimates demonstrates the increasing health of the regional economy. The Wyoming economy employed 39,000 people in 2017, primarily in manufacturing, health and social service, and also in retail trade. Major employers located in Wyoming include Metro Health, General Motors, Gordon Foods, UPS and Michigan Turkey Producers, with nearby employers throughout the metro area also benefiting from the city's workforce.

Among residents of Wyoming, the most common employment sectors are the same, led by manufacturing (9,170 employees), health care and social assistance (5,050), and retail trade (5,005). Resident commute to work times average from 20 to 22 minutes throughout the entire MSA, including the county and Wyoming.¹⁹

¹⁸ Bridge Magazine, Mike Wilkinson as published in Crain's Detroit Business Jan 6, 2017: Michigan's Economic Axis Tilts West

¹⁹ US Census Bureau American Community Survey 2017 5-year Estimates

Overall, labor force participation is high throughout west Michigan and in all three areas noted in this study, significantly higher than Michigan’s statewide participation rate of 61.2%. Wyoming is a working community, with nearly 72% of its residents participating in the labor force. Although that rate declined slightly from 2014 to 2017, Wyoming’s workforce participation is consistently higher than either the MSA or the county, exceeding both of those areas in 2014 and 2017 by at least 4%.

Earnings

Wyoming includes the highest proportion of individuals earning an income as compared to the MSA and county. Per capita earnings, however, lag well behind the per capita earnings of Kent County, the MSA, and the state. Wyoming’s 2017 per capita dollars of \$24,115 represents \$4,624 less than the MSA, and \$5,318 less than the county, a difference of 22%. Michigan’s per capita income of \$28,938 is 20% higher than that of Wyoming.

Wyoming households had a median income of \$50,971 in 2017, nearly 12% smaller than Kent County households, and trailing the MSA median household income by over \$7,000 per household, or 14%. Examination of mean or average²⁰ household income in the years presented illustrates even more clearly a substantial, persistent dollar gap for Wyoming households. Although average household incomes increase across the board, the 20% to 22% difference between Wyoming and average household incomes in the MSA and the county is consistent in 2014 and 2017.

Table 4-3. Median Household, Family, and Non-Family Incomes, Grand Rapids-Wyoming MSA, Kent County, Wyoming MI, 2017

Type and Number	Grand Rapids-Wyoming MSA	Kent County	Wyoming
Median Household Income	\$58,094	\$57,302	\$50,971
# of Households	383,745	236,929	27,915
Median Family Income	\$70,384	\$70,224	\$58,468
# of Families	262,664	157,244	18,477
Median Non-Family Income	\$32,181	\$33,490	\$31,442
# of Non-Family Households	121,081	79,685	9,438

Source: American Fact Finder ACS 2017, 5-year Estimates

Measuring family income²¹ as opposed to household income, the negative dollar difference is more pronounced, and increases from 2014 to 2017. Wyoming’s 2017 median family income of \$58,468 is slightly over 20% less than that of the county’s families, a difference of \$11,756 per family. Average figures also indicate declining family incomes. The gap between Wyoming and MSA families grew from 24.15% in 2014 to 27.03% in 2017. The larger difference as compared to Kent County families also increased, with Wyoming families averaging \$17,307 behind in 2014 and \$20,965 behind in 2017 – from 26.79% to 29.92% less than Kent County families.

²⁰ Average means the totality of separate items divided by the number of items.

²¹ US Census Bureau definitions: A *Family* is a group of two or more people (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family. A *household* consists of all the people who occupy a housing unit. A house, an apartment or other group of rooms, or a single room, is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is, when the occupants do not live with any other person in the structure and there is direct access from outside or through a common hall. ... A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, also counted as a household.

Poverty rates range from 12.4% throughout the entire MSA to 15.50% for Wyoming residents as a whole. All areas of this study have experienced a decline in poverty from 2014 to 2017, reflecting the economic recovery of west Michigan as well as the entire state following the 2008 downturn. In the specific age groups of residents under 18 years and over 65 years, Wyoming poverty rates have dropped by a smaller margin than the county and the MSA. That smaller decrease is also seen in the use of SNAP (food stamp) benefits within the past 12 months, dropping by less than one percentage point while the larger areas dropped by 1.6 points (Kent County) and 4.6 points (MSA).

Household Income

Wyoming includes a greater proportion of households at lower incomes than the surrounding county and the MSA region. Separating household income into three levels (Table 4-4), more than one-third of Wyoming households fall into the lowest at below the \$35,000 annual income mark, compared to less than 30% of either Kent County or the MSA region. The middle group of income levels shows a similar pattern, with more than 50% of Wyoming households earning at least \$35,000 but less than \$100,000 – a higher rate in the middle category than either of the larger areas. The distinctions among household income levels are most dramatic at the highest level of over \$100,000. Less than one in seven Wyoming residents fell into that category in 2017, while close to one in four County residents and one in five MSA residents had incomes of more than \$100,000.

Table 4-4. 2017 Household Incomes, Past 12 Months in inflation-adjusted dollars, Grand Rapids-Wyoming MSA, Kent County, Wyoming MI

Household Income Level	Grand Rapids- Wyoming MSA	Kent County	Wyoming
Total Population	383,745	236,929	27,915
Less than \$10,000	20,526	13,703	1,658
\$10,000 to \$14,999	14,831	9,833	1,360
\$15,000 to \$19,999	17,622	10,918	1,491
\$20,000 to \$24,999	18,704	11,421	1,217
\$25,000 to \$29,999	19,046	11,907	1,864
\$30,000 to \$34,999	19,195	12,239	1,684
Total < \$35,000	109,924	70,021	9,274
Percent of total population	28.7%	29.6%	33.2%
\$35,000 to \$39,999	18,974	12,213	1,790
\$40,000 to \$44,999	17,756	10,343	1,405
\$45,000 to \$49,999	17,349	10,332	1,070
\$50,000 to \$59,999	33,613	20,050	3,027
\$60,000 to \$74,999	44,738	27,236	3,729
\$75,000 to \$99,999	52,526	31,370	3,732
Total \$35,000 - \$99,999	184,956	111,544	14,753
Percent of total population	48.2%	47.1%	52.9%
\$100,000 to \$124,999	34,718	20,897	1,827
\$125,000 to \$149,999	19,860	12,273	905
\$150,000 to \$199,999	18,733	11,503	664
\$200,000 or more	15,5	10,691	492
Total \$100,000 - \$200,000 or more	73,311	55,364	3,888
Percent of total population	19.1%	23.4%	13.9%

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

Race & Ethnicity

Wyoming is a diverse community in racial and ethnic terms compared to the county and the MSA, with a Hispanic or Latino population of over 20% (16,571 persons), nearly twice as high as the county and more than twice that of the MSA. Most of the Hispanic population is Mexican by origin (slightly over two-thirds, or 68.6% of Hispanic residents), making up 15.1% (11,374 people) of Wyoming's total population.

Within the US Census categories of those who identify as one race, White individuals number 56,196, and make up less (74.8%) of Wyoming's population than that of Kent County (80.3%) and the MSA (84.7%). Of those 58,553 residents included in the ethnic category of Not Hispanic or Latino, 47,644 identify by race as White alone, Black or African American alone (5,171), Asian alone (2,057), Native Hawaiian and Other Pacific Islander alone (37) or among the 6,507 persons included in the categories of Some Other Race Alone, or Two or More races (3,239).

Hispanic individuals are the largest minority group by ethnicity, followed by the racial minority group of Black and African American persons who make up 7.8% of the city's residents. It is important to understand that race and ethnicity are separate categories, such that Hispanic individuals can be of any race, and racial categories can and do reflect various ethnicities within the same racial category.

With regard to racial identity, just over half of Hispanic residents identify as White²² alone (51.6%, or 8,552 persons) with the balance of Hispanics identifying as Black or African American alone (738), American Indian and Alaska Native alone (489), or Asian alone (17). Over 40% of Wyoming's Hispanic residents identify themselves in the large categories of Some Other Race or Two or More Races, totaling 6,775 persons.²³

As referenced in Table 4-5: Population by Race and Hispanic Origin, MSA, Kent County, Wyoming MI, 2017, across all areas Asians represent from 2.5% to almost 3% of the population. Of the remaining categories, those identifying as American Indian/Alaska Native make up over 1% only in Wyoming, with Native Hawaiian and Other Pacific Islanders accounting for less than one percent across the entire region. A significant number of persons are counted as Some Other Race or Two or More Races, more so in Wyoming than in Kent County or the MSA.

All population and demographic figures used in this study, while generally regarded as the best available, are based on 5-year estimates derived from the American Community Survey rather than from a decennial census count.

²² US Census Bureau; Overview of Race and Hispanic Origin: 2010; The U.S. Census Bureau collects race and Hispanic origin information following the guidance of the U.S. Office of Management and Budget's (OMB) 1997 Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity. These federal standards mandate that race and Hispanic origin (ethnicity) are separate and distinct concepts and that when collecting these data via self-identification, two different questions must be used. Hispanic Origin: "Hispanic or Latino" refers to a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race. People of Hispanic origin may be any race. White refers to a person having origins in any of the original peoples of Europe, the Middle East, or North Africa. It includes people who indicated their race(s) as "White" or reported entries such as Irish, German, Italian, Lebanese, Arab, Moroccan, or Caucasian.

²³ US Census Bureau American Community Survey 2017 5-year Estimates

Table 4-5. Population by Race and Ethnicity, Grand Rapids-Wyoming MSA, Kent County, Wyoming MI, 2017

Race	Grand Rapids-Wyoming MSA		Kent County		Wyoming	
White	880,197	84.7%	511,125	80.3%	56,196	74.8%
Black or African American	67,306	6.5%	61,686	9.7%	5,909	7.9%
American Indian and Alaska Native	4,028	<1%	2,581	<1%	865	1.2%
Asian	26,384	2.5%	18,154	2.9%	2,074	2.8%
Native Hawaiian and Other Pacific Islander	217	<1%	144	<1%	37	<1%
Some Other Race / Two or More Races	42,686	4.1%	61,050	9.6%	10,043	13.4%
		100.0%		100.0%		100.0%
Ethnicity						
Hispanic	95,615	9.2%	65,434	10.3%	16,571	22.1%
Non-Hispanic	943,567	90.8%	570,942	89.7%	58,553	77.9%

Source: US Census Bureau American Community Survey (ACS) 2017 5-year Estimate

Foreign Born Populations

Wyoming's foreign-born population grew by 4,184 in the three-year period following 2014, to reach a 2017 level of 10.9% which is substantially higher than that of the county at 8.0% and the surrounding MSA at 6.6%. The non-native populations in all three areas tend to be heavily Hispanic, with most of those individuals identifying Mexico as their country of birth.²⁴

Table 4-6. Grand Rapids-Wyoming MSA, Kent County, Wyoming, Native, and Foreign-Born Populations, 2014, 2017

Area	2014			2017		
	Total	Native	Foreign Born	Total	Native	Foreign Born
Grand Rapids-Wyoming MSA	1,007,329	943,386	63,943	1,039,182	970,219	68,963
	100%	93.7%	6.3%	100%	93.4%	6.6%
Kent County	615,381	568,461	46,920	636,376	582,272	51,104
	100%	92.4%	7.6%	100%	91.5%	8.0%
Wyoming	73,434	65,821	7,613	75,124	66,937	8,187
	100.00%	89.6%	10.4%	100.00%	89.1%	10.9%

Source: US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

²⁴ US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

Wyoming Profile

Wyoming’s geography encompasses 14 US Census Tracts, numbering from Tract 133 to Tract 145.02. For purposes of this study, the census tracts have been grouped according to geography into four local subareas, roughly representing the Northern, Eastern, Central, and southern or “Panhandle” areas of the city. Table 4-7 describes the population of each of those tracts along with the number of families and households in each of the tracts, and provides subtotals by subarea.

Subarea Characteristics

Population is not evenly distributed among census tracts, or among the four subareas of Wyoming described in this study. The highest population is found in the Central section of Wyoming, from 28th Street south to 44th Street, an area featuring several high-density multifamily housing complexes.

Northern Wyoming

Census tracts 133, 134, and 135 make up the northern portion of the city, north of 28th Street - a main commercial corridor also designated as M-11, a Michigan highway running east-west through Wyoming’s downtown district.

Central Wyoming: 28th Street SW to 44th Street SW

Census tracts 137, 138.01 and 138.02, 139, and 140 make up this district, stretching from US-131 west to the boundary of the neighboring city of Grandville.

Wyoming East of US-131

Census tracts 136, 141, 142, and 143 are located in the narrow strip of Wyoming east of highway US-131.

Wyoming Panhandle

Census tracts 145.01 and 145.02 make up the most southern area of Wyoming, bounded by 44th Street SW and the M-6 highway and stretching from US-131 west to Kenowa Avenue SW and the county boundary that separates Kent County from Ottawa County.

Table 4-7. Population, Families, and Households by Subarea

Subarea	Census Tract	Total Population	No. of Families	No. of Households
North	133	4,662	1,074	1,468
	134	5,567	1,371	1,973
	135	4,577	897	1,778
	Subarea Total	14,806	3,342	5,219
Central	137	6,874	1,702	2,655
	138.01	1,547	380	766
	138.02	7,200	1,678	2,952
	139	6,979	1,688	2,778
	140	7,078	1,798	2,704
	Subarea Total	29,678	7,246	11,855
East of US-131	136	2,030	493	710
	141	1,887	479	716
	142	4,104	954	1,344
	143	3,243	799	1,113
	Subarea Total	11,264	2,725	3,883
Panhandle	145.01	12,776	2,868	3,798
	145.02	7,695	2,122	2,864
	Subarea Total	20,471	4,990	6,662

Source: Federal Financial Institutions Examination Council (FFIEC) 2017 Census Report – Summary Census Population Information: Michigan, Kent County, 133.00 – 145.02

**Figure 4-2.
Census Tracts**

- Census Tract
- North Census Tract Group
- East of US-131 Census Tract Group
- Central Census Tract Group
- Panhandle Census Tract Group

Note: This map has been included in the following sections to be used as a reference for tables.

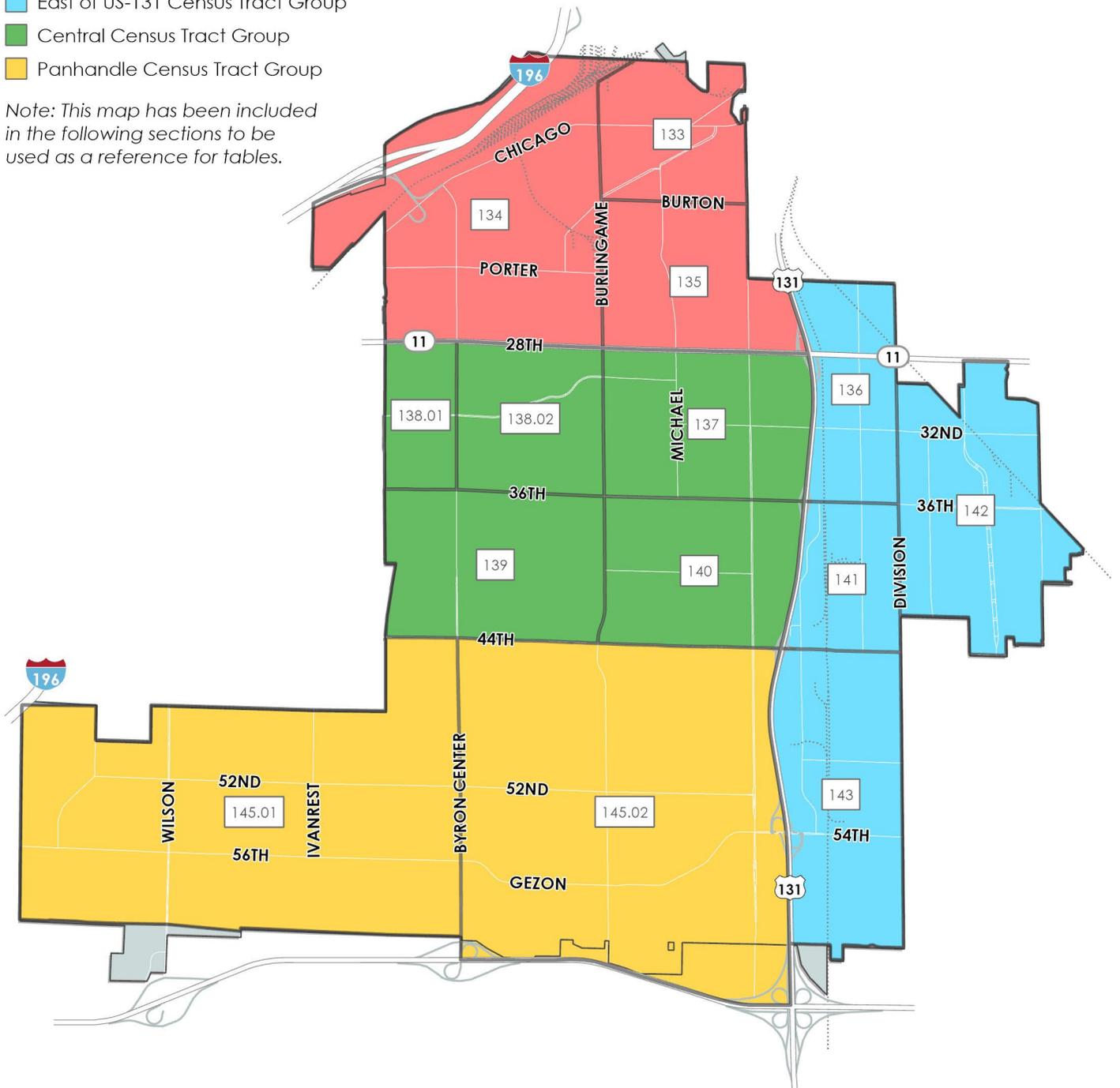


Figure 4-3.
Number of Households
by Census Tract

- 1,000 Households or Less
- 1,001-2,000 Households
- 2,001-3,000 Households
- 3,001 Households or More

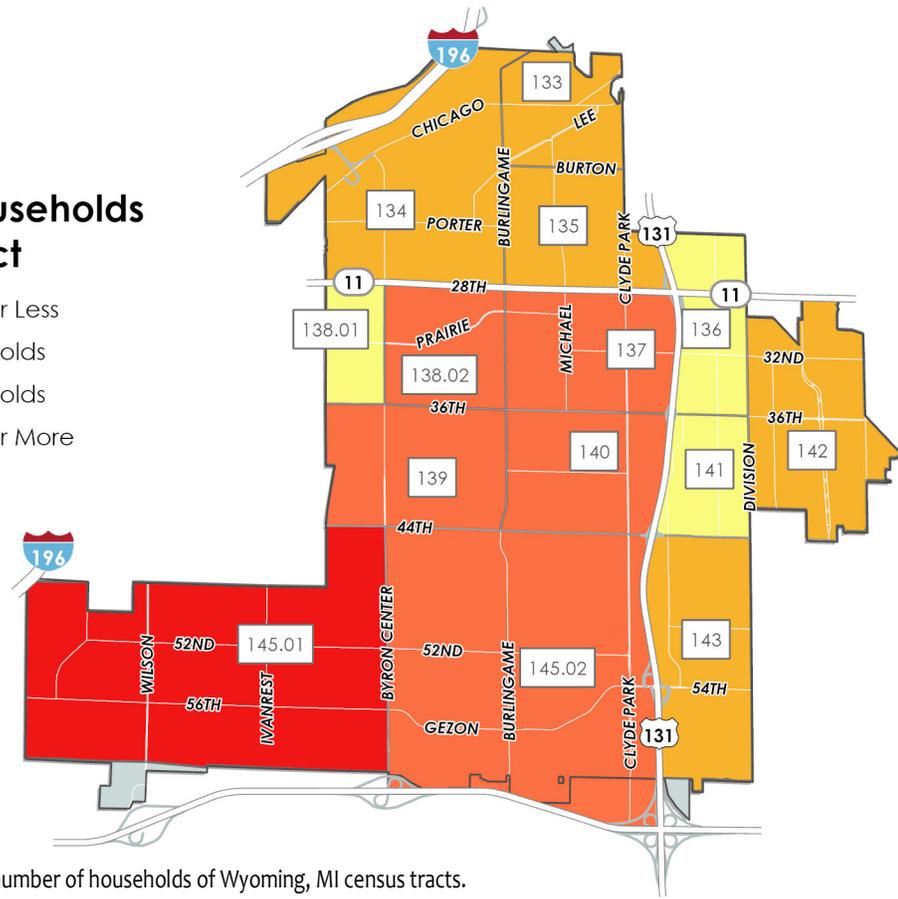


Figure 4-3 illustrates levels by number of households of Wyoming, MI census tracts.

Figure 4-4.
Number of Families
by Census Tract

- 500 Families or Less
- 501-1,000 Families
- 1,001-2,000 Families
- 2,001 Families or More

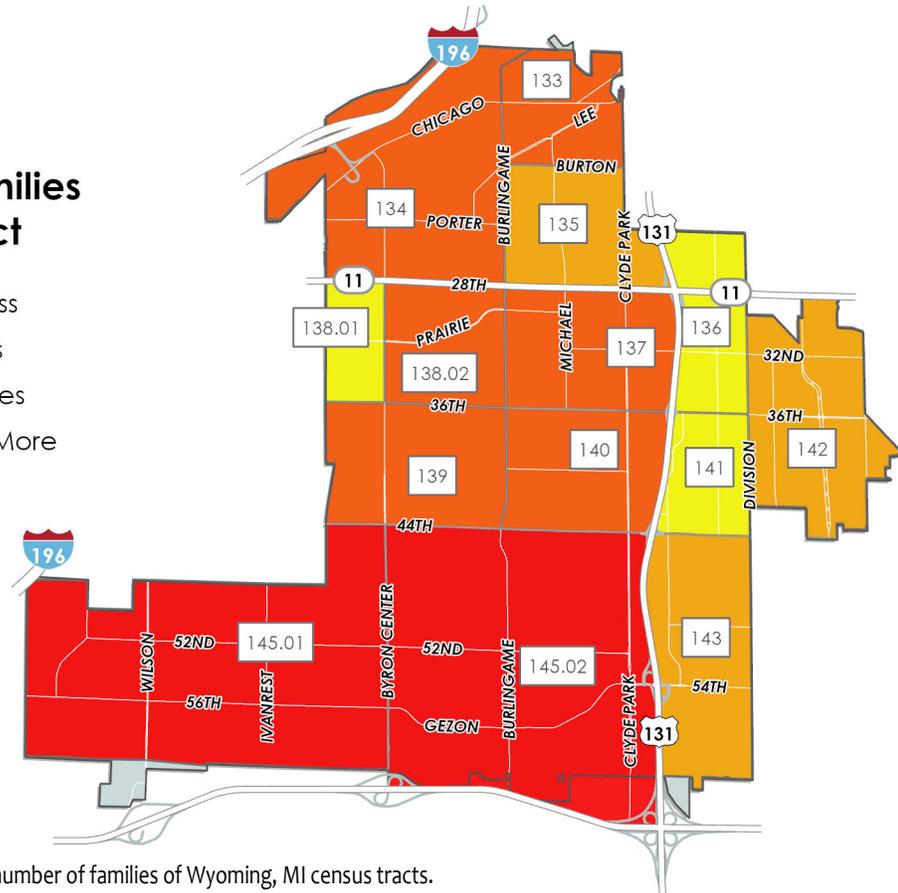


Figure 4-4 illustrates levels by number of families of Wyoming, MI census tracts.

Family Size by Subarea

Family sizes are relatively consistent through all four subareas (Table 4-8), ranging from 4.10 persons per family in the Central and Panhandle subareas to 4.43 persons per family in the Northern subarea. Household sizes vary more, from a low of 2.50 persons per household in the Central subarea to 3.07 persons in the Panhandle subarea.

The difference in persons per household as compared to persons per family is a reflection of the large number of multifamily and apartment units north of 44th Street SW as compared to the predominance of single-family housing development in the southern sections of Wyoming, which is only recently starting to densify.

Table 4-8. Wyoming Population, By Census Tract, Number and Average Size of Families and Households, 2017

Subarea	Census Tract	Total Population	No. of Families	Average Family Size	No. of Households	Average Household Size
North	133	4,662	1,074		1,468	
	134	5,567	1,371		1,973	
	135	4,577	897		1,778	
	Subarea Total	14,806	3,342	4.43	5,219	2.84
Central	137	6,874	1,702		2,655	
	138.01	1,547	380		766	
	138.02	7,200	1,678		2,952	
	139	6,979	1,688		2,778	
	140	7,078	1,798		2,704	
	Subarea Total	29,678	7,246	4.10	11,855	2.50
East of US-131	136	2,030	493		710	
	141	1,887	479		716	
	142	4,104	954		1,344	
	143	3,243	799		1,113	
	Subarea Total	11,264	2,725	4.13	3,883	2.90
Panhandle	145.01	12,776	2,868		3,798	
	145.02	7,695	2,122		2,864	
	Subarea Total	20,471	4,990	4.10	6,662	3.07

Source: FFIEC 2017 Census Report – Summary Census Demographic Information MSA/MD24340

Disability Status

Residents with disabilities and those over 65 years of age accounted for more than 30% of Wyoming’s population in 2017 (Table 4-9). Little comparable data is available but according to US Census Bureau ACS data, the city’s population showed a slight increase in both Disability Status and Age > 65 Years groups from the previous year.²⁵

Table 4-9. Wyoming, Persons with a Disability and Persons Over 65 years, 2017

Status	Number	Percent
Non-Institutionalized population	74,989	100%
With a Disability	3,548	13.6%
Age > 65 years	26,171	34.9%

Source: US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

²⁵ US Census Bureau American Community Survey (ACS) 2016 5-year Estimates: Population with any disability – 13.1%; > 65 years – 34.0%. Data is not available for preceding years.

Income

Cost, affordability, and availability are the housing issues most frequently mentioned in community meetings and by survey respondents. The substantial difference in tract median family incomes makes clear that the issue of affordability related to limited financial resources is concentrated in certain areas, particularly census tracts 133, 135 (Northern Wyoming subarea), 137, 138.01, and 138.02 (Central Wyoming subarea), and 136 (north end of East subarea). The remaining tracts reflect incomes above \$50,000 per family. Family incomes rise above the MSA median of \$67,000²⁶ in only two of Wyoming's census tracts, both of which are in the Panhandle subarea (tracts 145-01 and 145.02).

Median Family Income by Census Tract

Median family incomes in Wyoming's census tracts range from 56.7% of the MSA median to more than 120% of that measure, from a low of \$37,995 to \$80,568 in 2017 (Table 4-10). Census tracts 145.01 and 145.02, located in the Panhandle subarea along the southern edge of the city, have both the highest incomes and the largest tract populations. These two relatively high-income tracts hold 24.65% of Wyoming's total population.

Table 4-10. Wyoming Population by Census Tract and Median Family Income, 2017

Subarea	Census Tract	Population	Tract Median Family Income	% to MSA Median Family Income
North	133	4,662	\$39,302	58.7%
	134	5,567	\$60,327	90.0%
	135	4,577	\$37,995	56.7%
Central	137	6,874	\$44,173	65.9%
	138.01	1,547	\$44,407	66.2%
	138.02	7,200	\$39,510	59.0%
	139	6,979	\$59,696	89.1%
	140	7,078	\$55,462	82.8%
East of US-131	136	2,030	\$44,441	66.3%
	141	1,887	\$55,396	82.7%
	142	4,104	\$51,268	76.5%
	143	3,243	\$51,462	76.8%
Panhandle	145.01	10,746	\$78,537	117.2%
	145.02	7,695	\$80,568	120.3%

Source: Federal Financial Institutions Examination Council (FFIEC) 2017 Census Report – Summary Census Demographic Information MSA/MD24340

²⁶ Federal Financial Institutions Examination Council; FFIEC 2017 Census Report Summary Census Income Information MSA/MD 24340

Tract Income Level and Population Below Poverty Level by Median Family Income, 2017

2017 guidelines released by the US Department of Health and Human Services define poverty as an annual income of \$12,060 for an individual, and \$24,600 for a family of four.²⁷ Three of Wyoming’s census tracts show a poverty rate over 20%, indicating that more than one in five of the three-tract total of 16,439 residents live in poverty (Table 4-11). Only three tracts show less than one in ten persons below the poverty line, with the balance of the city’s census tracts measuring between 10% and 20% of their population below federal poverty guidelines.

Table 4-11. Wyoming Population by Census Tract, Income Level and Poverty, 2017

Census Tract	Population	% Below Poverty Line	Tract Income Level	Median Family Income	
				Tract 2017 Est.	% of MSA Median Family Income
135	4,577	25.4	Moderate	\$37,996	56.7%
133	4,662	26.7	Moderate	\$39,302	58.7%
138.02	7,200	21.6	Moderate	\$39,510	59.0%
137	6,874	15.4	Moderate	\$44,173	65.9%
136	2,030	19.4	Moderate	\$44,441	66.3%
138.01	1,547	15.3	Moderate	\$44,408	66.3%
142	4,104	15.1	Moderate	\$51,268	76.5%
143	3,243	17.2	Moderate	\$51,463	76.8%
141	1,887	8.7	Middle	\$55,396	82.7%
140	7,078	12.6	Middle	\$55,463	82.8%
139	6,979	13.4	Middle	\$59,697	89.1%
134	5,567	12.1	Middle	\$60,327	90.0%
145.01	10,746	8.7	Middle	\$78,537	117.2%
145.02	7,695	8.0	Upper	\$80,568	120.3%

Source: Federal Financial Institutions Examination Council (FFIEC) 2017 Census Report – Summary Census Income Information MSA/MD24340

Family Income and Poverty Level by Tract

Arranging the city’s 14 census tracts according to family income levels shows the lowest income tracts in the Northern subarea of Wyoming, north of and crossing 28th Street SW, and close along both sides of the US-131 highway to the Division Avenue border. Median family incomes rise in the Central subarea as tracts cross 44th Street SW, with the highest incomes in the most southern census tracts bordering Byron Center and the M-6 highway.

More than half of Wyoming’s tracts are described as having “Moderate” family income levels of \$52,000 or less per family. Five of the remaining tracts, including census tract 134 in the northwest corner of the city and census tract 145.02 on the southern border, are categorized as “Middle”. Census tract 145.02 in the most southwestern portion of Wyoming adjacent to the Ottawa County border is an “Upper” income tract with a 2017 estimated median family income of over \$80,000 annually.

²⁷ CFR/ Vol 82, No 19 / January 31, 2017 / Notices: DHHS Office of the Secretary: Annual Update of the HHS Poverty Guidelines

Minority Population by Tract

Four of Wyoming’s 14 census tracts are made up of half or more minority residents (Table 4-12), with tracts 135 and 138.02 slightly under the 50% mark and tracts 142 (which crosses Division Avenue) and 133 with minority residents making up more than one in two of their total tract populations. In tract 133, which is located at the northern edge of Wyoming, almost 60% of residents identify themselves as a minority.

Table 4-12. Wyoming Minority Population, By Census Tract and Percent Minority, 2017

Subarea	Census Tract	Population	Minority Population	% Minority
North	133	4,662	2,718	58.3%
	134	5,567	1,275	22.9%
	135	4,577	2,233	48.8%
Central	137	6,874	2,403	35.0%
	138.01	1,547	462	29.9%
	138.02	7,200	3,523	48.9%
	139	6,979	1,692	24.2%
	140	7,078	2,388	33.7%
East of US-131	136	2,030	812	40.0%
	141	1,887	448	23.7%
	142	4,104	2,101	51.2%
	143	3,243	1,146	35.3%
Panhandle	145.01	10,746	1,393	13.0%
	145.02	7,695	1,311	17.0%

Source: Federal Financial Institutions Examination Council (FFIEC) 2017 Census Report – Summary Census Income Information MSA/MD24340

Race and Hispanic Origin by Tract

Closer examination of each of Wyoming’s 14 census tracts in Table 4-13: Wyoming Population, By Census Tract, Race and Hispanic Origin, 2017 on the following page illustrates the relative spatial distribution across the city according to race and Hispanic origin.

The White non-Hispanic population, which represents 75% of all Wyoming residents, falls below that overall level in nine of the city’s 14 census tracts, and make up about half to two-thirds of the population in eight of those tracts. White non-Hispanic residents exceed the citywide rate (average) by just over 10% in a single census tract, 145.01 in the Panhandle subarea.

The Black, non-Hispanic population of Wyoming resides throughout the city, as census tract measures range from a high of 9.0% in census tract 138.02 to a low of 5.4% in tract 137. No tract varies by more than one third from the proportion of Wyoming’s citywide population of 7.9% (5,909 Black residents).

Hispanic residents make up 22% of Wyoming’s population as illustrated in Table 4-13: Wyoming Population by Census Tract, Race, and Hispanic Origin, 2017. Overall, a total of three of the city’s 14 tracts are 50% above the citywide rate of 22% Hispanic, and a single tract falls more than 50% below the citywide rate. In the census tract with the largest Hispanic population (tract 133), Hispanic persons represent just over half (50.9%) of residents. The lowest Hispanic population is found in tract 145.01 with 5.0%. The balance of census tracts fall within a range of 50% over or under the Wyoming average of 22% Hispanic residents, varying from 11.5% to 37.4%.

Table 4-13. Wyoming Population, By Census Tract, Race and Hispanic Origin, 2017

Census Tract	Total Population	White Non-Hispanic	Minority Population				
			Black	American Indian & Native Alaska	Asian/Pacific Islander	Hispanic	Other/2 or More Races
133	4,662	1,944 41.7%	254 5.5%	12 0.3%	26 0.6%	2,371 50.9%	55 1.2%
134	5,567	4,292 77.1%	313 5.6%	11 0.2%	39 0.7%	768 13.8%	144 2.6%
135	4,577	2,344 51.2%	400 8.7%	5 0.1%	239 5.2%	1,397 30.5%	192 4.2%
136	2,030	1,218 60.0%	176 8.7%	35 1.7%	14 0.7%	553 27.2%	34 1.7%
137	6,874	4,471 65.0%	371 5.4%	0 0.0%	212 3.1%	1,581 23.0%	239 3.5%
138.01	1,547	1,085 70.1%	131 8.5%	0 0.0%	8 0.5%	245 15.8%	78 5.0%
138.02	7,200	3,677 51.1%	645 9.0%	13 0.2%	118 1.6%	2,406 33.4%	341 4.7%
139	6,979	5,287 75.8%	391 5.6%	39 0.6%	59 0.9%	967 13.9%	236 3.4%
140	7,078	4,690 66.3%	396 5.5%	0 0.0%	186 2.6%	1,598 22.6%	208 2.9%
141	1,887	1,439 76.3%	88 5.5%	0 0.0%	10 0.5%	323 17.1%	27 1.4%
142	4,104	2,003 48.8%	367 5.5%	0 0.0%	190 4.6%	1,534 37.4%	10 0.2%
143	3,243	2,097 64.7%	189 5.5%	46 1.4%	97 3.0%	606 18.7%	208 6.4%
145.01	10,746	9,353 87.0%	127 5.5%	42 0.4%	523 4.9%	539 5.0%	162 1.5%
145.02	7,695	6,384 83.0%	80 5.5%	13 0.2%	287 3.7%	887 11.5%	44 0.6%
Wyoming	75,124	56,196 74.8%	5,909 7.9%	865 1.2%	21 2.8%	16,571 22.1%	5,380 7.2%
Kent County	636,376	511,125 80.3%	61,686 9.7%	2,581 <1%	18,154 2.9%	65,434 10.3%	42,686 6.7%
MSA	1,039,182	880,197 84.7%	67,306 6.5%	4,028 <1%	26,834 2.6%	95,616 9.2%	61,050 5.9%

Source: Federal Financial Institutions Examination Council (FFIEC) 2017 Census Report – Summary Census Population Information: Michigan, Kent County, 133.00 – 145.02

Race by Subarea

Wyoming’s minority populations according to race and national origin classifications are not spread evenly throughout the city, but are somewhat proportional to overall population in each of the four subareas (Table 4-14). The highest number of minority persons is found in the subarea, which is home to the largest portion of Wyoming’s population. The lowest minority population, however, is found in the Panhandle subarea which includes nearly 25% of the city’s total population. This second-largest subarea houses 11.3%, or slightly over one in ten, of the city’s minority residents.

In the North, Central, and East subareas, minority residents range from 35.3% to 42.1% of each subarea’s population. In the Panhandle, minorities represent 13.2% of the subarea’s population which is the lowest rate among all other subareas.

Table 4-14. Minority Population by Subarea, 2017

Subarea	Population	% of Wyoming Population	Minority Population		% of Wyoming Minority Population
			Subarea Minority Population	% of Wyoming Total Population	
North	14,806	19.7%	6,226	8.4%	26.0%
Central	29,678	39.5%	10,468	14.1%	43.8%
East of US-131	11,264	15.0%	4,507	6.1%	18.9%
Panhandle	20,471	27.6%	2,704	3.6%	11.3%

Source: 2017 FFIEC Census Report – Summary Census Population Information: Michigan, Kent County, 133.00 - 145.02

Figure 4-5. Minority Population Distribution by Subarea

- 15% or Less
- 16%-20%
- 21-26%
- 27% or More

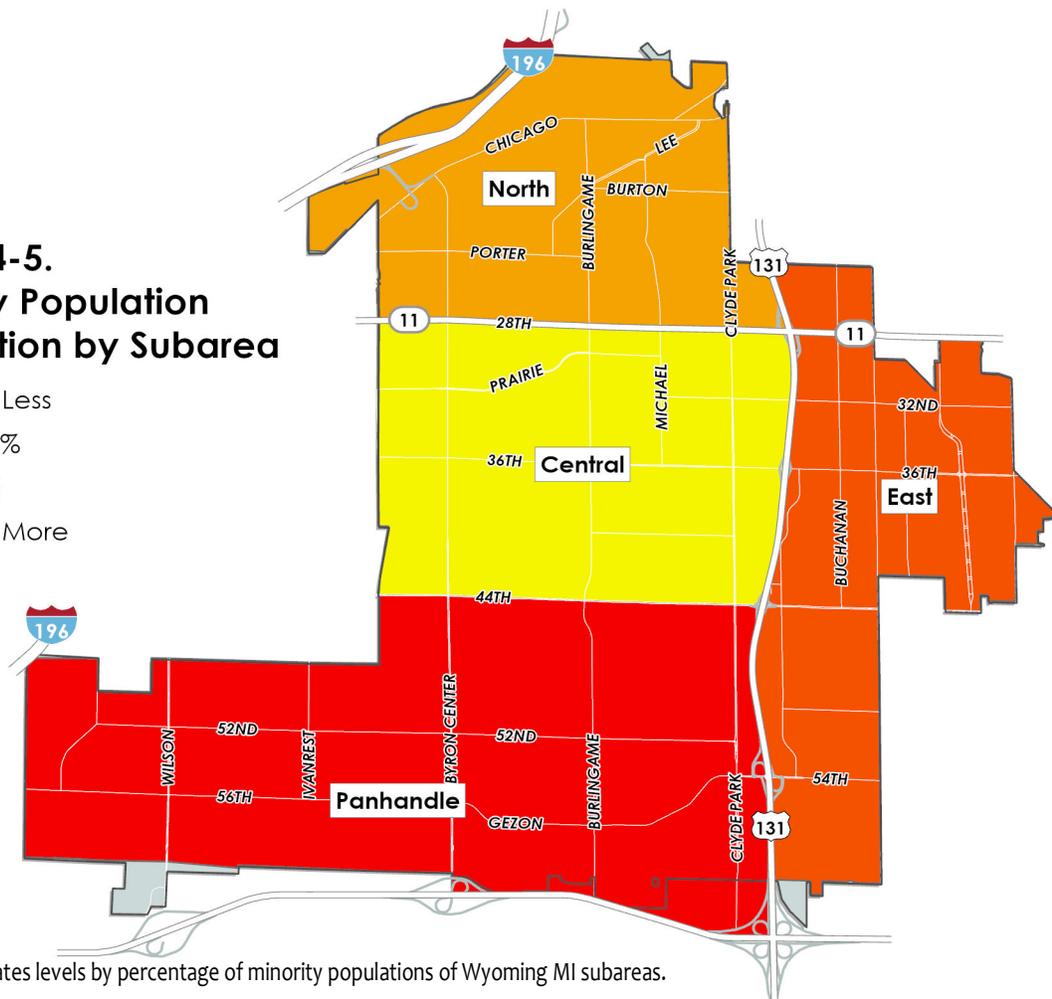


Figure 4-5 illustrates levels by percentage of minority populations of Wyoming MI subareas. Wyoming, Michigan – Analysis of Impediments to Housing Choice & Housing Needs Assessment Prepared by Houseal Lavigne and Lee Nelson Weber

Section 5. Housing Units

Wyoming’s housing inventory features a mix of single-family and apartment style, multifamily units in each of its 14 census tracts, providing a range of housing choices regarding location, size, cost, owner or renter status, and styles from single-family homes to large developments of rental and condominium options.

Housing Data Sources

Information used in this section to describe characteristics of Wyoming’s housing supply is drawn from the US Census Bureau American Community Survey (ACS) 2017 5-year Estimate data. As noted in Section 3. Background: Analysis of Impediments to Fair Housing Choice – Methodology, the ACS was designed by the US Census Bureau to provide estimates of the characteristics of the population, not to provide counts of the population in different geographic areas or population subgroups.

ACS information related to Wyoming’s housing supply is available in datasets at the “principal city” level, and also at the individual census tract level. ACS 2017 5-year Estimate data available at the individual tract level (as used in Table 5-2) varies slightly from the data available at the Wyoming city level. Although both sets of information are drawn from the same source, variations occur due to the nature of the ACS data itself and differing margins of error.²⁸

Information used in this report reflects the most reliable and available source related to the topic and geography described. As illustrated in Table 5-1, citywide data differs slightly from census tract level data in population, and in the number of owner-occupied housing units (and the resulting number of housing units).

Table 5-1. Data Comparison: American Community Survey 5-year Estimates, 2017

ACS 2017 5-year Estimates	Wyoming MI (principal city)	Wyoming Census Tracts (14)
Population	75,124	75,240
Housing Units	29,217	29,242
1-4 Family Units	21,945	21,970
Occupied Units	27,915	27,940
Owner-Occupied Units	18,250	18,275
Renter-occupied Units	9,665	9,665
Vacant Units	1,302	1,302

Source: American Fact Finder ACS 2017, 5-year Estimates

NOTE: Sampling error in ACS Data. Because the ACS is based on a sample from a larger population and inventory of housing units and people, ACS estimates have a degree of uncertainty associated with them, called sampling error. In general, the larger the sample, the smaller the level of sampling error. ACS data for small statistical areas (such as census tracts) have no control totals, which may lead to errors in the population and housing unit estimates. To help users understand the impact of sampling error on data reliability, the Census Bureau provides a “margin of error” for each published ACS estimate. The margin of error, combined with the ACS estimate, give users a range of values within which the actual “real-world” value is likely to fall.²⁹

²⁸ Understanding the ACS: The Basics, Understanding and Using American Community Survey Data: What All Data Users Need to Know; US Census Bureau, 2017

²⁹ Understanding the ACS: The Basics, Understanding and Using American Community Survey Data: What All Data Users Need to Know; US Census Bureau, 2017

Wyoming Housing Characteristics

Table 5-2 illustrates the population of each Wyoming census tract according to ACS 2017 5-year Estimate data along with total units per tract, and the percentage of occupancy status (Owner-occupied, Renter-occupied, Vacant) of housing units in each tract, organized by Wyoming's geographic subareas.

Although Wyoming's housing includes a sizable rental market, owner occupancy of its housing units ranges from a low of just over 30% to a high of over 75% (30.8% to 75.7%). The citywide owner occupancy measure of 65.4% is substantially higher than that of Grand Rapids (54%) and less than that of Kent County (69%) and the MSA (72.3%), according to ACS city, county, and MSA level data.³⁰

Table 5-2. Population, Housing Units, and 1-4 Family Units, with Occupancy Status Percentages by Census Tract, 2017

Subarea	Census Tract	Population	Total Housing Units	% Owner-occupied Units	% Renter-occupied Units	% Vacant Units	% 1-4 Family Units
North	133	5,263	1,676	63.6%	31.3%	5.1%	95.1%
	134	5,607	2,128	68.8%	29.7%	1.5%	82.4%
	135	5,090	1,867	53.2%	43.4%	3.4%	70.8%
Central	137	7,041	2,807	66.9%	24.8%	8.3%	82.5%
	138.01	1,497	721	56.7%	41.9%	1.4%	77.9%
	138.02	7,198	3,095	30.8%	65.3%	3.9%	42.9%
	139	6,468	2,859	56.1%	39.6%	4.3%	62.8%
	140	7,095	2,846	71.7%	26.4%	1.9%	83.3%
East of US-131	136	2,208	888	55.6%	26.8%	17.6%	78.8%
	141	2,000	738	72.9%	22.5%	4.6%	100.0%
	142	4,191	1,480	64.1%	27.9%	8.0%	96.9%
Panhandle	143	3,250	1,186	67.0%	23.9%	9.1%	91.6%
	145.01	10,865	3,983	71.5%	24.9%	3.6%	72.3%
	145.02	7,473	2,968	75.7%	23.8%	5.1%	70.4%

Source: American Community Survey ACS 2017 5-year Estimate: Wyoming census tracts 133-145.02

³⁰ American Community Survey ACS 2017 5-year Estimate: Wyoming city, MI, Kent County, Grand Rapids-Wyoming MSA.

Housing Units by Tract

Table 5-3 provides a more comprehensive look at Wyoming's housing stock and offers an owner-renter context for each Wyoming census tract. According to ACS 2017 5-year Estimate data for Wyoming citywide, 65.4% of the city's total 27,915 occupied housing units are owner-occupied compared to 34.6% of units occupied by renter households.

Since Table 5-3 provides information at the tract rather than the citywide level, it uses ACS 2017 5-year Estimate data at the tract level to describe the number of 1-4 family units, and the occupancy status of all units in each tract by number and percentage, grouped by subarea.

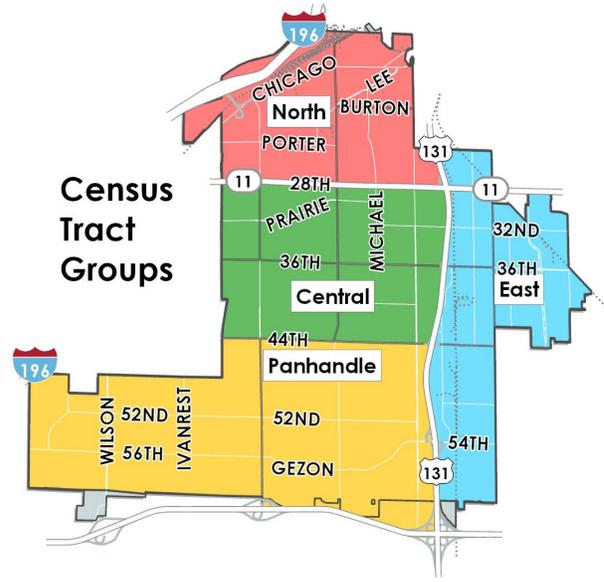


Table 5-3. Wyoming Housing Units and Status by Census Tract

Subarea	Census Tract	Total Housing Units	1- to 4- Family Units	Occupied Units	Vacant Units	Owner-Occupied Units	Renter-Occupied Units
North (3,076.5 ac.)	133 (573.1 ac.)	1,676	1,594	1,591	85	1,066	525
			95.1%	94.9%	5.1%	63.6%	31.3%
	134 (1,756.0 ac.)	2,128	1,754	2,094	34	1,463	631
			82.4%	98.4%	1.6%	68.8%	29.7%
	135 (747.4 ac.)	1,867	1,322	1,803	64	993	810
			70.8%	96.6%	3.4%	53.2%	43.4%
Central (3,642.6 ac.)	137 (901.8 ac.)	2,807	2,317	2,572	235	1,877	695
			82.5%	91.6%	8.4%	66.9%	24.8%
	138.01 (315.2 ac.)	721	562	711	10	409	302
			77.9%	98.6%	1.4%	56.7%	41.9%
	138.02 (643.9 ac.)	3,095	1,328	2,974	121	954	2,020
			42.9%	96.1%	3.9%	30.8%	65.3%
	139 (947.1 ac.)	2,859	1,795	2,735	124	1,603	1,132
		62.8%	95.7%	4.3%	56.1%	39.6%	
	140 (834.7 ac.)	2,846	2,371	2,792	54	2,042	750
			83.3%	98.1%	1.9%	71.7%	26.4%
East of US-131 (3,221.6 ac.)	136 (593.6 ac.)	888	700	732	156	494	238
			78.8%	82.4%	17.6%	55.6%	26.8%
	141 (459.7 ac.)	738	738	704	34	538	166
			100.0%	95.4%	4.6%	72.9%	22.5%
	142 (1,101.9 ac.)	1,480	1,434	1,361	119	948	413
		96.9%	92.0%	8.0%	64.1%	27.9%	
	143 (1,066.4 ac.)	1,186	1,086	1,078	108	795	283
			91.6%	90.9%	9.1%	67.0%	23.9%
Panhandle (6,138.6 ac.)	145.01 (2,966.4 ac.)	3,983	2,880	3,840	143	2,847	993
			72.3%	96.4%	3.7%	71.5%	24.9%
	145.02 (3,172.2 ac.)	2,968	2,089	2,953	15	2,246	707
			70.4%	99.5%	0.5%	75.7%	23.8%

Source: American Community Survey ACS 2017 5-year Estimate: Wyoming census tracts 133-145.02

Organizing Wyoming census tracts according to the total number of housing units in each tract helps to clarify the differences among high homeowner and high renter tracts, particularly evident in comparing tracts 145.01, and especially 145.02 (owner-occupancy rates of 71.5% and 75.7%, respectively), with tract 138.02 (30.8% owners).

Looking at total housing units, the lowest volume tracts 136, 138.01, and 141 combined add up to less than 2,400 units, more than 80% of which are 1-4 family housing. Likewise, those tracts with a high proportion of rental housing such as tract 138.02 (65.3% rental) are notable, as rental units represent two-thirds of all units and outnumber owner-occupied units by a factor of two to one.

**Figure 5-1.
Total Housing Units
by Census Tract**

- Less than 1,100 Units
- 1,100-2,099 Units
- 2,100-3,099 Units
- 3,100 Units or More

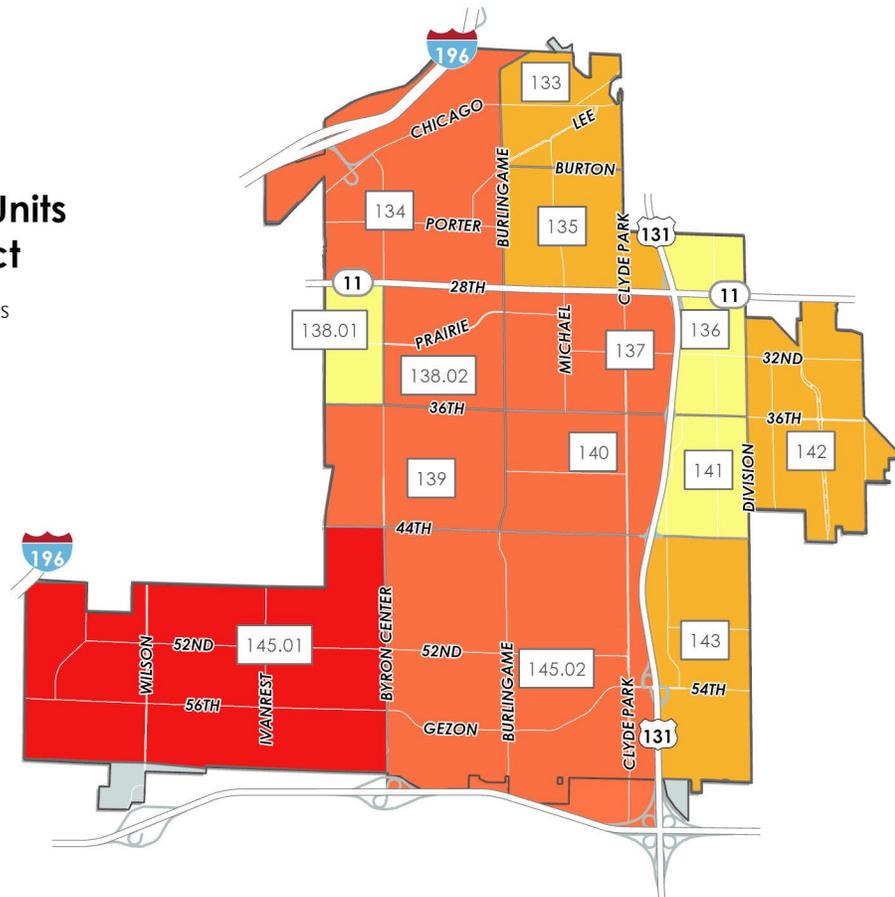


Figure 5-1 illustrates levels by number of total housing units of Wyoming, MI census tracts.

**Figure 5-2.
Housing Unit Density
by Census Tract**

- Less than 1.5 Units/Acre
- 1.5-2.4 Units/Acre
- 2.5-3.5 Units/Acre
- More than 3.5 Units/Acre

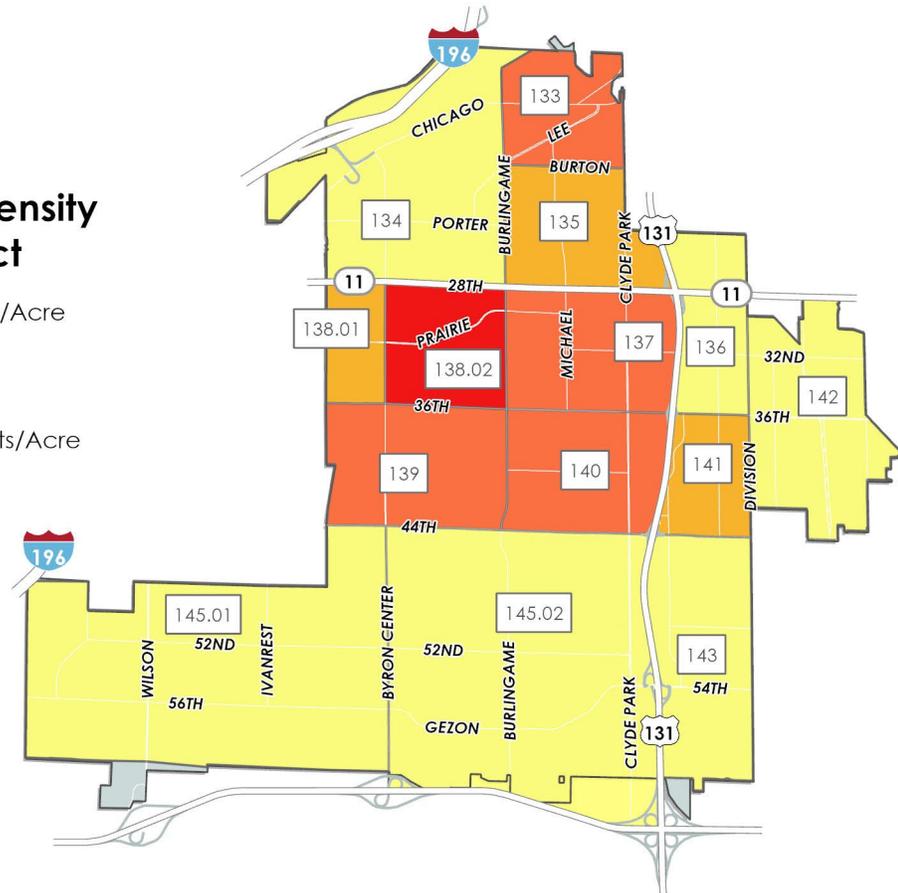


Figure 5-2 illustrates the number of housing units per acre within each number of total housing units of Wyoming, MI census

The following tables 5-4 through 5-10 provide similar information from ACS 2017 5-year Estimate data available at the census tract level about Wyoming housing units, ranked by factors of total units, 1-4 family units, vacant and occupied units, and owner and renter occupancy status.

Housing Units per Census Tract

Table 5-4 ranks Wyoming's 14 census tracts by the number of total housing units in each tract, from a high of 3,983 units in tract 145.01 to a low of 721 in tract 138.01. The two highest volume tracts, 145.01 and 138.02 have from 3,000 to nearly 4,000 units each. The next five tracts (145.02, 139, 140, 137, and 134) range between 2,000 and 3,000 units. Tracts 135, 133, 142, and 143 are next in descending order with 1,867 to 1,186 units. The remaining three census tracts (136, 141, and 138.01) have fewer than 1,000 housing units each.

Table 5-4. Housing by No. of 1-4 Family Units by Census Tract, 2017

Census Tract	Total Housing Units	1- to 4- Family Units	Occupied Units	Owner-Occupied Units	Renter-Occupied Units	Vacant Units
145.01	3,983	2,880	3,840	2,847	993	143
138.02	3,095	1,328	2,974	954	2,020	121
145.02	2,968	2,089	2,953	2,246	707	15
139	2,859	1,795	2,735	1,603	1,132	124
140	2,846	2,371	2,792	2,042	750	54
137	2,807	2,317	2,572	1,877	695	235
134	2,128	1,754	2,094	1,463	631	34
135	1,867	1,322	1,803	993	810	64
133	1,676	1,594	1,591	1,066	525	85
142	1,480	1,434	1,361	948	413	119
143	1,186	1,086	1,078	795	283	108
136	888	700	732	494	238	156
141	738	738	704	538	166	34
138.01	721	562	711	409	302	10

Source: American Community Survey ACS 2017 5-year Estimate: Wyoming census tracts 133-145.02

One to Four Family Housing Units

Table 5-5 ranks the same census tracts according to the number of 1-4 family units in each tract, from the fewest 1-4 family units in tract 138.01 to the most such units in tract 145.01, which is also the most populous census tract, described at over 10,000 residents in 2017. Census tract 138.01 on the western edge of Wyoming has the fewest 1-4 family homes (562), reflecting the overall low number of total housing units in that tract (721 units). Only three tracts have fewer than 1,000 1-4 family units. Five tracts have from 1,086 to 1,795, with the remaining tracts numbering over 2,000 units each.

Table 5-5. Housing by Tract and No. of 1-4 Family Unit, 2017

Census Tract	Total Housing Units	1- to 4- Family Units	Occupied Units	Owner-Occupied Units	Renter-Occupied Units	Vacant Units	Census Tract
138.01	721	562	711	409	302	10	138.01
136	888	700	732	494	238	156	136
141	738	738	704	538	166	34	141
143	1,186	1,086	1,078	795	283	108	143
135	1,867	1,322	1,803	993	810	64	135
138.02	3,095	1,328	2,974	954	2,020	121	138.02
142	1,480	1,434	1,361	948	413	119	142
133	1,676	1,594	1,591	1,066	525	85	133
134	2,128	1,754	2,094	1,463	631	34	134
139	2,859	1,795	2,735	1,603	1,132	124	139
145.02	2,968	2,089	2,953	2,246	707	15	145.02
137	2,807	2,317	2,572	1,877	695	235	137
140	2,846	2,371	2,792	2,042	750	54	140
145.01	3,983	2,880	3,840	2,847	993	143	145.01

Source: American Community Survey ACS 2017 5-year Estimate: Wyoming census tracts 133-145.02

Median House Age

Table 5-6 reflects the median age of housing in each Wyoming census tract. Based on similar information as other tables in this series, data has also been added regarding median housing age from the Federal Financial Institutions Examination Council (FFIEC). FFIEC 2017 summary data is based on ACS 2017 5-year Estimate data, and is the most accurate available regarding median age of housing at the census tract level.

Table 5-6 shows the progression of housing development across Wyoming, beginning in the north portion of the city in the 1940's, where the median house age is 76 years. Tracking south across 28th Street and toward 44th Street, eight census tracts were developed between roughly 1950 and 1965, reflecting the high rate of suburban growth in this area and throughout much of Michigan and the rest of the country. The next "youngest" median housing age tracts, 138.01 and 138.02, date from the mid 1980's, while those tracts with the lowest median age along the southern boundary of Wyoming were built up mainly over the last 20 years.

Examining the development of housing in Wyoming from this framework of median housing age, the decade between 1960 and 1970, with 7,520 housing units indicating median ages from 53 – 57 years, saw the most development activity in terms of increasing Wyoming's housing.

Table 5-6. Housing by Median Age by Census Tract, 2017

Census Tract	Total Housing Units	Median House Age (Years)	Occupied	Owner-Occupied Units	Renter-Occupied Units	Vacant Units
Recent:						
145.01	3,983	21	3,840	2,847	993	143
145.02	2,968	25	2,953	2,246	707	15
1980's:						
138.01	721	38	711	409	302	10
138.02	3,095	41	2,974	954	2,020	121
139	2,859	42	2,735	1,603	1,132	124
1960's:						
135	1,867	53	1,803	993	810	64
140	2,846	56	2,792	2,042	750	54
137	2,807	57	2,572	1,877	695	235
1950's:						
136	888	60	732	494	238	156
142	1,480	61	1,361	948	413	119
134	2,128	61	2,094	1,463	631	34
143	1,186	62	1,078	795	283	108
141	738	64	704	538	166	34
Oldest:						
133	1,676	76	1,591	1,066	525	85

Source: American Community Survey ACS 2017 5-year Estimate: Wyoming census tracts 133-145.02 and Federal Financial Institutions Examination Council FFIEC 2017 Census Report Summary Census Housing Information: Michigan, Kent County, 133.00-145.02

**Figure 5-3.
Median House Age
by Census Tract**

- 25 Years Old or Younger
- 26 to 45 Years Old
- 46 to 65 Years Old
- 66 Years Old or Older

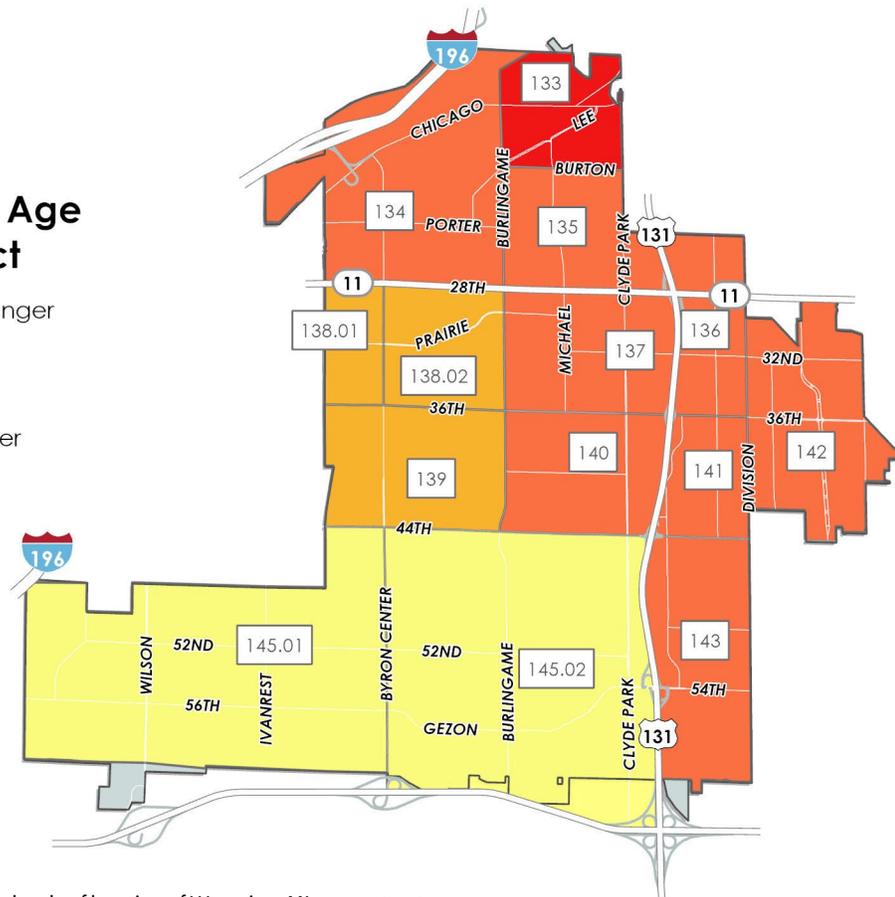


Figure 5-2 illustrates median age levels of housing of Wyoming, MI census tracts.

Owner-occupied Housing Units

Table 5-7 ranks Wyoming’s housing units by each tract’s number of owner-occupied units in ascending order. Census tract 138.01 is the smallest tract in Wyoming by population, and has the least owner occupants at 409 units out of a total 721 units. Its rate of owner-occupancy at 56.7% is fourth from the lowest rate across Wyoming tracts. Tract 145.01 in southern Wyoming, with the largest population and the highest number of total housing units, contains the largest number of owner-occupied units at 2,847, for an owner-occupant rate of 75.7%.

Table 5-7. Housing by No. of Owner-Occupied Units by Census Tract, 2017

Census Tract	Total Housing Units	1- to 4- Family Units	Occupied Units	Owner-Occupied Units	Renter-Occupied Units	Vacant Units
138.01	721	562	711	409	302	10
136	888	700	732	494	238	156
141	738	738	704	538	166	34
143	1,186	1,086	1,078	795	283	108
142	1,480	1,434	1,361	948	413	119
138.02	3,095	1,328	2,974	954	2,020	121
135	1,867	1,322	1,803	993	810	64
133	1,676	1,594	1,591	1,066	525	85
134	2,128	1,754	2,094	1,463	631	34
139	2,859	1,795	2,735	1,603	1,132	124
137	2,807	2,317	2,572	1,877	695	235
140	2,846	2,371	2,792	2,042	750	54
145.02	2,968	2,089	2,953	2,246	707	15
145.01	3,983	2,880	3,840	2,847	993	143

Source: American Community Survey ACS 2017 5-year Estimate: Wyoming census tracts 133-145.02

Vacant Housing Units

ACS 2017 5-year Estimate data illustrated in Table 5-8 above describes a total of 1,302 vacant housing units across Wyoming in that year. The highest number of vacant units is reported in tract 137, where 235 vacancies represent 8.3% of total units in that tract. The highest percentage of vacant units occurs in 136, a relatively small tract in terms of housing units located directly between Division Ave and US-131 where 156 units, or 17.6% of the tract total, are reported as vacant in 2017.

Table 5-8. Housing by No. of Vacant Units by Census Tract, 2017

Census Tract	Total Housing Units	1- to 4- Family Units	Vacant Units	Occupied Units	Owner-Occupied Units	Renter-Occupied Units
138.01	721	562	10	711	138.01	302
145.02	2,968	2,089	15	2,953	145.02	707
141	738	738	34	704	141	166
134	2,128	1,754	34	2,094	134	631
140	2,846	2,371	54	2,792	140	750
135	1,867	1,322	64	1,803	135	810
133	1,676	1,594	85	1,591	133	525
143	1,186	1,086	108	1,078	143	283
142	1,480	1,434	119	1,361	142	413
138.02	3,095	1,328	121	2,974	138.02	2,020
139	2,859	1,795	124	2,735	139	1,132
145.01	3,983	2,880	143	3,840	145.01	993
136	888	700	156	732	136	238
137	2,807	2,317	235	2,572	137	695

Source: American Community Survey ACS 2017 5-year Estimate: Wyoming census tracts 133-145.02

Renter-Occupied Housing Units

Table 5-9 below ranks Wyoming's census tracts by the number of renter-occupied units per tract, ranging from the highest, tract 138.02 with 2,020 rental units (65.3%) out of the total 3,095 units in that tract to the fewest, tract 141 with 166 rental units representing 22.5% of its total housing.

Tracts 138.02, 139, and 145.01 connect from north to south, and are located in central Wyoming, near or at the city's western boundary line. The combined 4,145 rental units in the three tracts make up 42.9% of the total rental housing units in Wyoming. The rate of renter-occupied housing to total housing exceeds the citywide rate of 33.1% in four census tracts: 138.02 (65.3%), 135 (43.4%), 138.01 (41.9%), and 139 (39.6%). The number of and percent of renter-occupied housing units is mapped by census tract in Figures 5-6 and 5-7.

Table 5-9. Housing by Number of Renter-Occupied Units

Census Tract	Total Housing Units	1- to 4- Family Units	Occupied Units	Owner-Occupied Units	Renter-Occupied Units	Percent Renter-Occupied of Total Units	Vacant Units
138.02	3,095	1,328	2,974	954	2,020	65.3%	121
139	2,859	1,795	2,735	1,603	1,132	39.6%	124
145.01	3,983	2,880	3,840	2,847	993	24.9%	143
135	1,867	1,322	1,803	993	810	43.4%	64
140	2,846	2,371	2,792	2,042	750	26.4%	54
145.02	2,968	2,089	2,953	2,246	707	23.8%	15
137	2,807	2,317	2,572	1,877	695	24.8%	235
134	2,128	1,754	2,094	1,463	631	29.7%	34
133	1,676	1,594	1,591	1,066	525	31.3%	85
142	1,480	1,434	1,361	948	413	27.9%	119
138.01	721	562	711	409	302	41.9%	10
143	1,186	1,086	1,078	795	283	23.9%	108
136	888	700	732	494	238	26.8%	156
141	738	738	704	538	166	22.5%	34

Source: American Community Survey ACS 2017 5-year Estimate: Wyoming census tracts 133-145.02

Housing Occupancy by Subarea

The final table in this series, Table 5-10, describes Wyoming's housing supply by all census tracts organized and totaled by the North, Central, East of US-131, and Panhandle subareas. The Central area, containing by far the highest number of rental units, also features the largest portion (42.2%) of total housing units. The four census tracts located east of US-131 exhibit the lowest numbers in the categories of total housing units, 1-4 family units, as well as owner- and renter-occupied units, with the only exception being a relatively high number of vacancies in that subarea (417 or 9.7%) for the amount of housing in the tract.

Table 5-10. Housing Characteristics by Subarea and Census Tract, 2017

Subarea	Census Tract	Total Housing Units	1- to 4- Family Units	Occupied Units	Owner-Occupied Units	Renter-Occupied Units	Vacant Units
North	133	1,676	1,594	1,591	1,066	525	85
	134	2,128	1,754	2,094	1,463	631	34
	135	1,867	1,322	1,803	993	810	64
	Subarea Total	5,671	4,670	5,488	3,522	1,966	183
Central	137	2,807	2,317	2,572	1,877	695	235
	138.01	721	562	711	409	302	10
	138.02	3,095	1,328	2,974	954	2,020	121
	139	2,859	1,795	2,735	1,603	1,132	124
	140	2,846	2,371	2,792	2,042	750	54
	Subarea Total	12,328	8,373	11,784	6,885	4,899	544
East of US-131	136	888	700	732	494	238	156
	141	738	738	704	538	166	34
	142	1,480	1,434	1,361	948	413	119
	143	1,186	1,086	1,078	795	283	108
	Subarea Total	4,292	3,958	3,875	2,775	1,100	417
Panhandle	145.01	3,983	2,880	3,840	2,847	993	143
	145.02	2,968	2,089	2,953	2,246	707	15
	Subarea Total	6,951	4,969	6,793	5,093	1,700	158

Source: American Community Survey ACS 2017 5-year Estimate: Wyoming census tracts 133-145.02

Figure 5-4.
Percent Owner-Occupied
by Census Tract

- Less than 55% Owner-Occupied Units
- 55%-67% Owner-Occupied Units
- 68-72% Owner-Occupied Units
- 73% or More Owner-Occupied Units

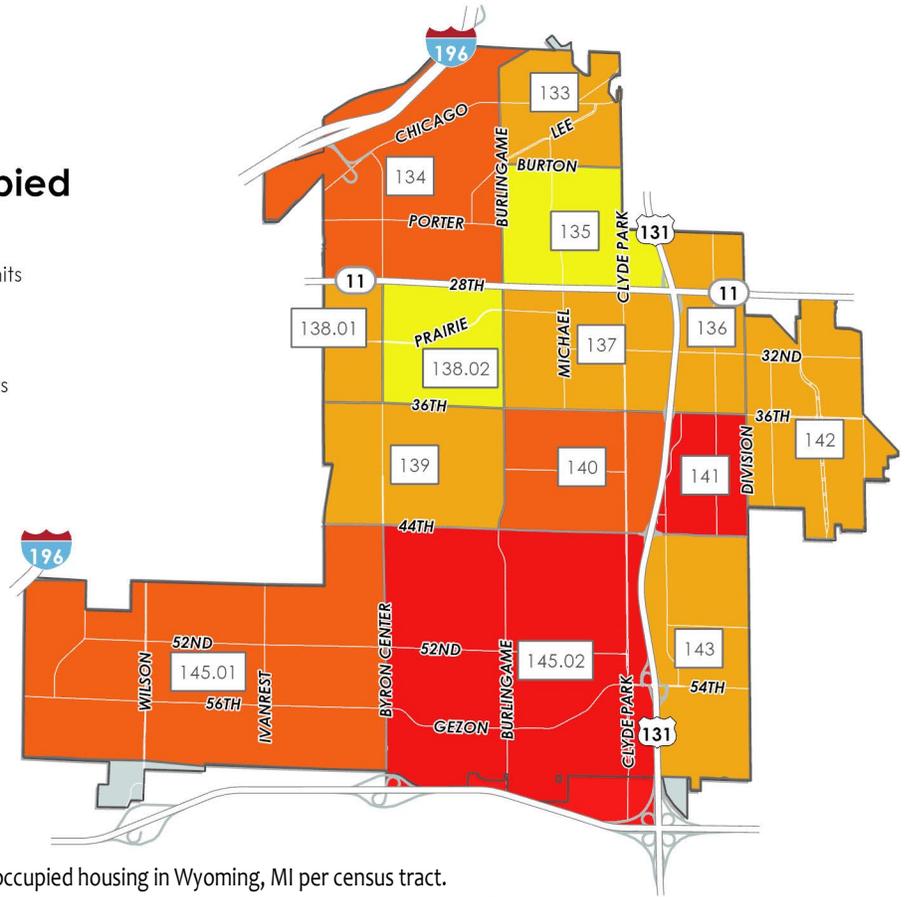


Figure 5-3 illustrates percentage of owner-occupied housing in Wyoming, MI per census tract.

Figure 5-5.
Number of Owner-Occupied
Units by Census Tract

- Less than 750 Units
- 750-1,599 Units
- 1,600-2,749 Units
- 2,750-2,999 Units
- 3,000 Units or More

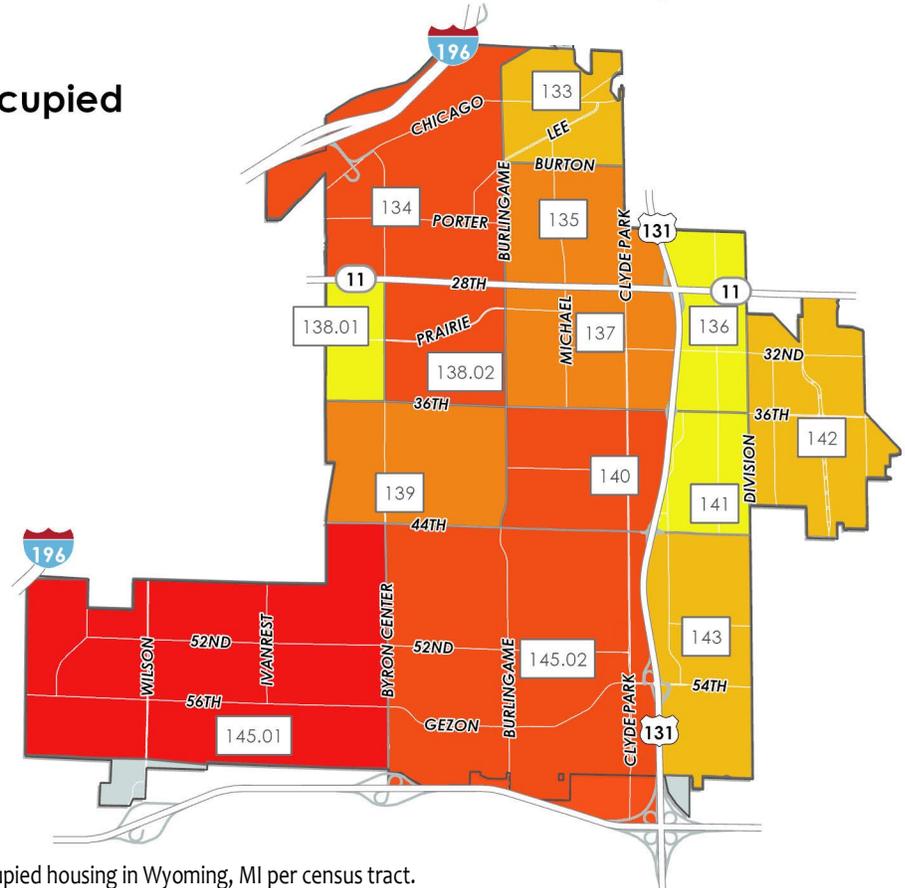


Figure 5-4 illustrates number of owner-occupied housing in Wyoming, MI per census tract.

Figure 5-6.
Percent Renter-Occupied
Units by Census Tract

- 25% or Less Renter-Occupied Units
- 26%-28% Renter-Occupied Units
- 29%-40% Renter-Occupied Units
- 41% or More Renter-Occupied Units

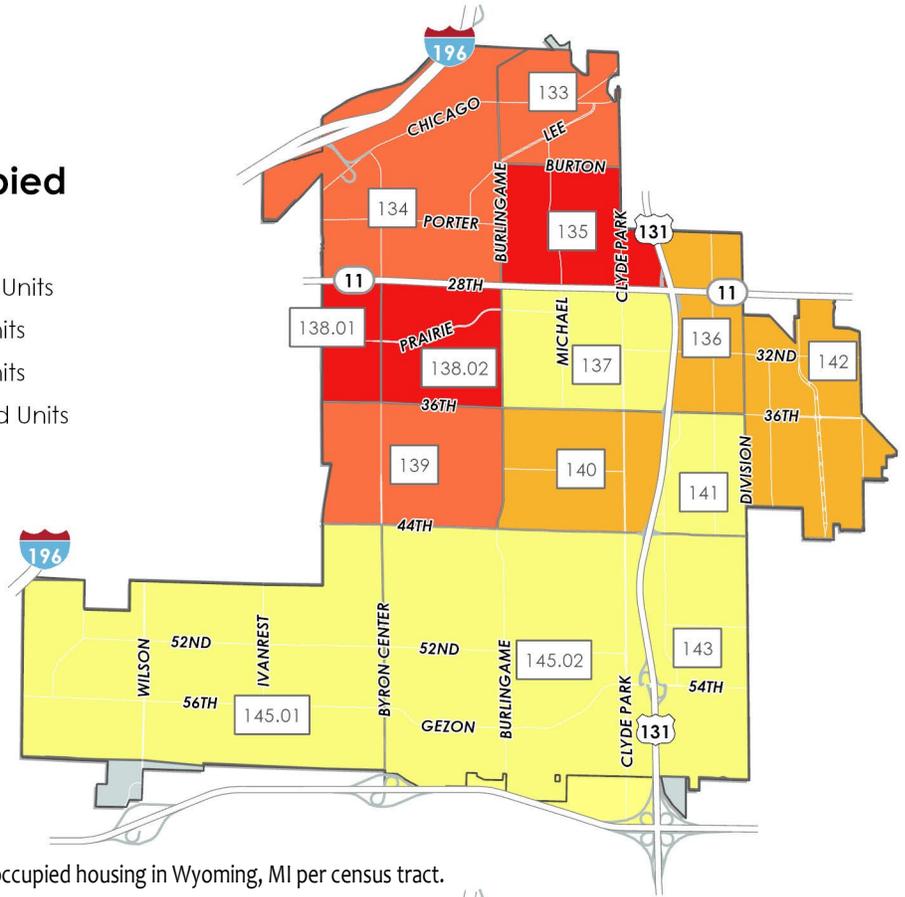


Figure 5-5 illustrates percentage of renter-occupied housing in Wyoming, MI per census tract.

Figure 5-7.
Number of Renter-Occupied
Units by Census Tract

- Less than 800 Units
- 800-1,049 Units
- 1,050-1,899 Units
- 1,900 Units or More

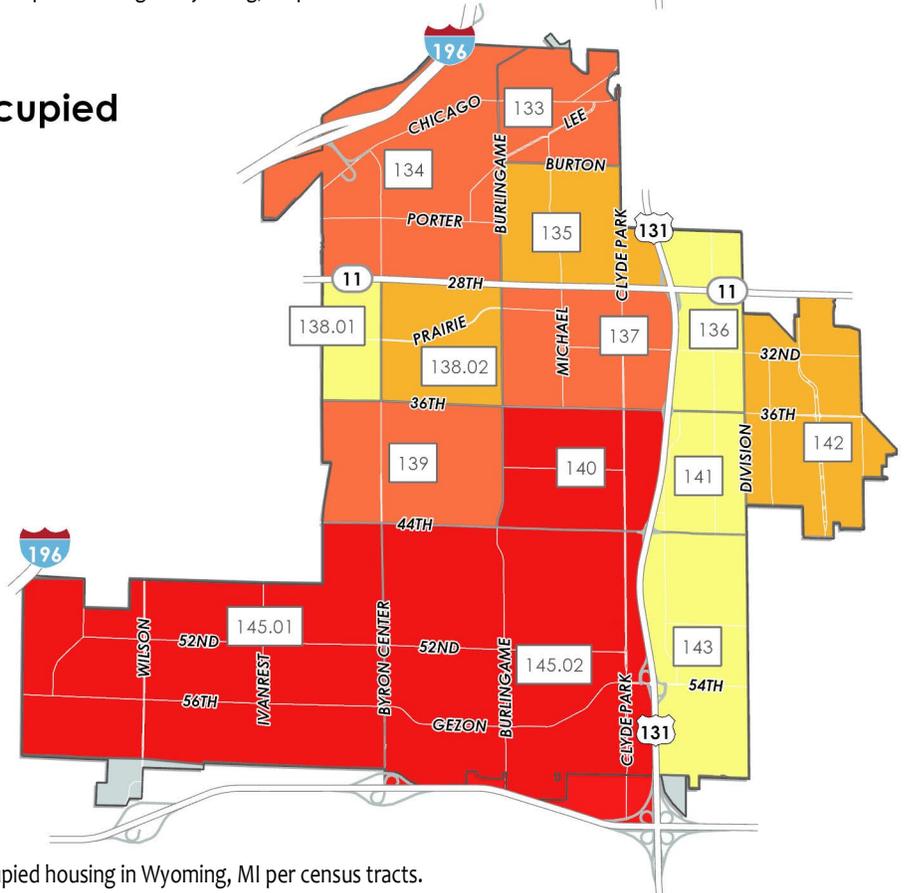


Figure 5-6 illustrates number of renter-occupied housing in Wyoming, MI per census tracts.

Household Characteristics

The following tables illustrate household characteristics of Wyoming by household type, as well as size and occupancy status, according to ACS 2017 5-year Estimate data.

Household Type

Table 5-11 is derived from citywide Wyoming ACS 2017 5-year Estimate data, and describes the types of households found in occupied units by type and occupancy status.

Family households account for two-thirds of all occupied housing units across Wyoming (18,477 of 27,915 units or 66.2%). With regard to occupied units, family households represented nearly three-quarters of Wyoming's 18,250 owner-occupied units (13,627 or 74.7%) and just over half (50.2%) of its 9,665 renter-occupied households.

Slightly over two-thirds (68.3%) of families are identified as a married couple family. Single-headed households totaling 5,843 households comprise the remaining third (31.6%) of families, and are headed by males at a rate of 28.4%, and females at 71.6%. According to this ACS data, single headed households are more likely to reside in renter-occupied rather than owner-occupied housing, applying most significantly to female-headed households.

Family households reported living with related children under the age of 18 years at a rate of 51.7%, and were represented fairly evenly in owner-occupied housing (34%) and renter-occupied housing (34.6%).

Table 5-11. Housing by Household Type, 2017

Units & Households	Occupied Units	% Total Occupied Units	Owner-Occupied Units	% Owner-Occupied Units	Renter-Occupied Units	% Renter-Occupied Units
Occupied Housing Units	27,915	100%	18,250	65.4%	9,665	34.6%
Household Type						
Family Households	18,477	66.2%	13,627	74.7%	4,850	50.2%
Married-Couple Family	12,634	45.3%	10,418	57.1%	2,216	22.9%
Other Family	5,843	20.9%	3,209	17.6%	2,634	27.3%
Male-Headed	1,660	5.9%	978	5.4%	682	7.1%
Female-Headed	4,183	15%	2,231	12.2%	1,952	20.2%
Nonfamily Households	9,438	33.8%	4,623	25.3%	4,815	49.8%
With Related Children of Householder Under 18 Years	9,546	34.2%	6,198	34.0%	3,348	34.6%

Source: US Census Bureau American Community Survey (ACS) 2017 5-year Estimate: Wyoming City, MI

**Figure 5-8.
Female-Headed
Households
by Census Tract**

- 300 Households or Less
- 301-600 Households
- 601-900 Households
- 901 Households or More

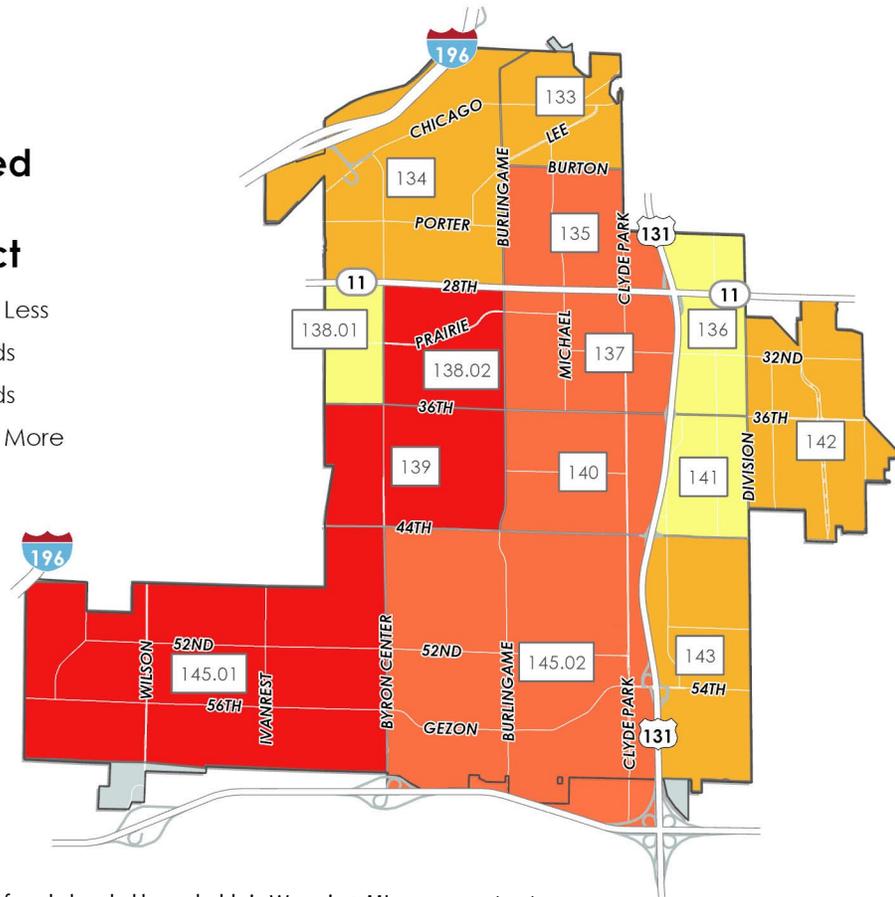


Figure 5-7 illustrates number of female-headed households in Wyoming, MI per census tracts.

Household Size

Table 5-12 describes Wyoming’s occupied housing units by household size (number of persons) and the percentage of those households in owner-occupied and renter-occupied units.

Two person households represented the largest share of occupied housing at slightly less than one-third (32.7%) of all occupied units. Single person households made up 25.8%, followed by four or more person households at 23.5%, and three person households at less than one in five households (17.9%).

The order of household size changes with the occupant’s owner or renter status. Two person households made up the largest portion of owner-occupied housing, at 35.6% of that category. Households of four or more persons measured as the next highest household size at 25.4%, with single and three person households in slightly less than one in five owner-occupied housing units (19.6% and 19.4%, respectively).

Renter households demonstrated a different pattern of household size, with single person households far outnumbering all other size categories, accounting for a third (37.6%) of renter –occupied housing. Two person households made up slightly over a quarter of rental housing at 27.3% of units, followed at less than 20% each by four or more, and three person households.

Table 5-12. Occupied Housing Units by Occupancy Status & Household Size, 2017

Units & Households	Occupied Units	% Total Occupied Units	Owner-Occupied Units	% Owner-Occupied Units	Renter-Occupied Units	% Renter-Occupied Units
Occupied Housing Units	27,915	100%	18,250	100%	9,665	100%
Household Size						
1-Person Household	7,210	25.8%	3,580	19.6%	3,630	37.6%
2-Person Household	9,139	32.7%	6,500	35.6%	2,639	27.3%
3-Person Household	5,009	17.9%	3,532	19.4%	1,477	15.3%
4-Or-More-Person Household	6,557	23.5%	4,638	25.4%	1,919	19.9%

Source: US Census Bureau American Community Survey (ACS) 2017 5-year Estimate: Wyoming City, MI

Section 6. Housing Cost

The concept of affordable housing is defined by HUD according to the percentage of monthly household income devoted to housing costs, with costs that fall under 30% of income regarded as affordable at all income levels. According to the current HUD definition, individuals and families who pay more than 30% of their income for housing are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation and medical care.

Almost one in three (8,109 households or 29.5%) of Wyoming's households paid more than 30% in housing costs in 2017, and thereby meet the HUD definition of cost-burdened for either homeowners or renters.³¹

Nationally, an estimated 12,000,000 renter and homeowner households pay more than 50% of their annual incomes for housing, according to HUD. A family with one full-time worker earning the minimum wage cannot afford the local fair-market rent for a two-bedroom apartment anywhere in the United States.

The 2017 median household income in Wyoming was \$50,971 annually. For owner-occupied units, that median income figure rises to \$61,242 annually. Households who rent had a much lower median income at \$31,635, or slightly better than half that of homeowners.

An annual income of \$50,971 represents an average monthly income of about \$4,250, and a weekly income of just under \$1,000 which equates to an hourly wage of \$24.50 for a 40-hour workweek. This income levels reflect several types of employment including some teachers, government workers, clerical and health care support staff, food preparation and serving, and many sales, retail and service professionals.³²

Households at the same overall income figure may have a single earner or be a combination of two or more working members to arrive at a total figure of \$50,971. The work possibilities in these combined income households are numerous, including food service, restaurant and hospitality staff, school aides, child and personal care attendants, retail, and part-time work in any field, earning less than full compensation due to limited hours.³³

The term *affordable housing* can often prompt a negative reaction, based on perceptions that those seeking affordable housing are somehow less than desirable neighbors. A deliberate and thoughtful effort on the part of Wyoming to promote a wider understanding of housing costs will help to build the necessary public support for increasing its affordable housing inventory as residents recognize the impact of housing and related costs on their own households and those of their neighbors.

³¹ Percentage derived from American Community Survey ACS 2017 5-year Estimate data, using 27,566 Wyoming housing units where rent as a percentage of household income can be computed.

³² US Bureau of Labor Statistics (BLS); Characteristics of Minimum Wage Workers 2017, Occupation (March 2018)

³³ US Bureau of Labor Statistics (BLS)

Kent County: ALICE 2019

ALICE is an acronym that stands for Asset Limited, Income Constrained, Employed, describing households with income above the Federal Poverty Level but below the basic cost of living. The 2019 ALICE report published by the Michigan Association of United Ways and the Council of Michigan Foundations provides, in its own words, “high –quality, research-based information to foster a better understanding of who is struggling in our communities.”³⁴

According to the ALICE report, 43% of Michigan’s population (1,660,000 households) cannot afford basic household necessities (housing, child care, food, transportation, health care, a smartphone, and taxes). Between 2010 and 2017, the basic cost of household expenses increased by 26% for a family of four – requiring an annual income of \$61,000 (\$64,788 in Kent County) to meet expenses, significantly higher than the corresponding 2017 federal poverty level of \$24,600. More than six in 10 jobs in Michigan pay less than \$20 per hour, while a family of four requires \$30.64 (\$32.39 in Kent County) per hour to cover basic costs.³⁵

For purposes of the ALICE report, a household consists of all the people who occupy a housing unit but does not include those living in group quarters such as a dorm, nursing home, or prison. The Household Survival Budget calculates the actual costs of basic necessities in Michigan, adjusted for different counties and household types. The ALICE Threshold is the average income that a household needs to afford the basic necessities defined by the Household Survival Budget for each county in Michigan. Households earning below the ALICE Threshold include both ALICE and poverty-level households.

Information presented in the following pages is based on 2017 data and is specific to Kent County, Michigan.³⁶

³⁴ ALICE in Michigan: A Financial Hardship Study 2018 Michigan Report; Michigan Association of United Ways; April 2019

³⁵ (ALICE Report 2018)

³⁶ (ALICE Report 2018) ALICE Author Note: This report remains focused on the county level because state averages can mask significant differences between counties. For example, the percentage of households below the ALICE Threshold ranges from 30% in Eaton County to 61% in Lake County. The Report examines issues surrounding ALICE households from different angles to draw the clearest picture with the range of data available. Sources include the American Community Survey, the U.S. Department of Housing and Urban Development, the U.S. Department of Agriculture, the Bureau of Labor Statistics at the U.S. Department of Labor, the Internal Revenue Service, the Tax Foundation, and the Michigan Department of Education Office of Great Start. State, county, and municipal data is used to provide different lenses on ALICE households. These data points are estimates; some are geographic averages, others are one- or five-year averages, depending on population size. Due to different rounding conventions in different data sources, total percentages may vary by +/-1 percentage point from 100% for a given group. Typically, [the report] presents rounded numbers to make the ALICE data as clear as possible to a general audience. ALICE Reports follow the U.S. Census classifications for the largest non-White populations: Black, Asian, Hispanic, and American Indian/Alaska Native, as well as people identifying as two or more races. Because people of any race, including Whites, can also be of Hispanic ethnicity, the ALICE data looks at White, Black, Asian, and American Indian/Alaska Native categories “alone” (i.e., not also Hispanic), as well as at Hispanic populations. In Michigan, ALICE data is only available for White, Black, Hispanic, and Asian populations; the American Community Survey does not provide income data on other race/ethnic categories due to the small sample size of these groups, so ALICE statistics are not available. In Michigan, less than one percent of households identify themselves as American Indian/Alaskan Native or “Some Other Race,” and two percent identify as being of “Two or More Races” (American Community Survey, 2017).

ALICE IN KENT COUNTY

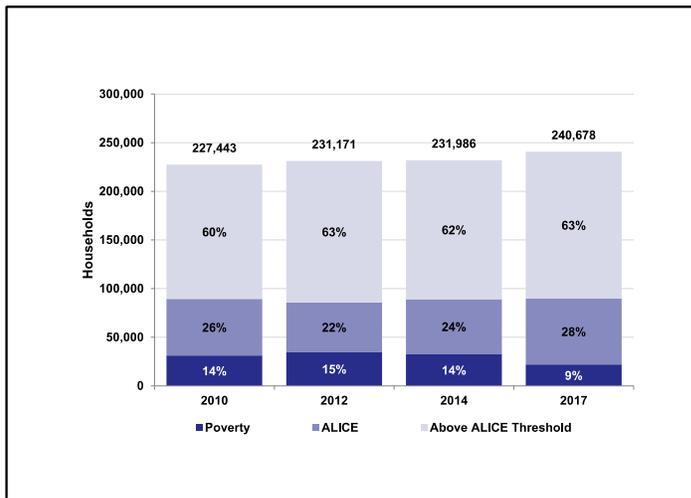
2017 Point-in-Time Data

Population: 648,594 • **Number of Households:** 240,678
Median Household Income: \$61,125 (state average: \$54,909)
Unemployment Rate: 4% (state average: 5.9%)
ALICE Households: 28% (state average: 29%) • **Households in Poverty:** 9% (state average: 14%)

How has the number of ALICE households changed over time?

ALICE is an acronym for **A**sset **L**imited, **I**ncome **C**onstrained, **E**mloyed – households that earn more than the Federal Poverty Level, but less than the basic cost of living for the county (the ALICE Threshold). Combined, the number of ALICE and poverty-level households equals the total population struggling to afford basic needs. The number of households below the ALICE Threshold changes over time; households move in and out of poverty and ALICE status as their circumstances improve or worsen. The recovery, which started in 2010, has been uneven across the state. Conditions have improved for some families, but with rising costs, many still find themselves struggling.

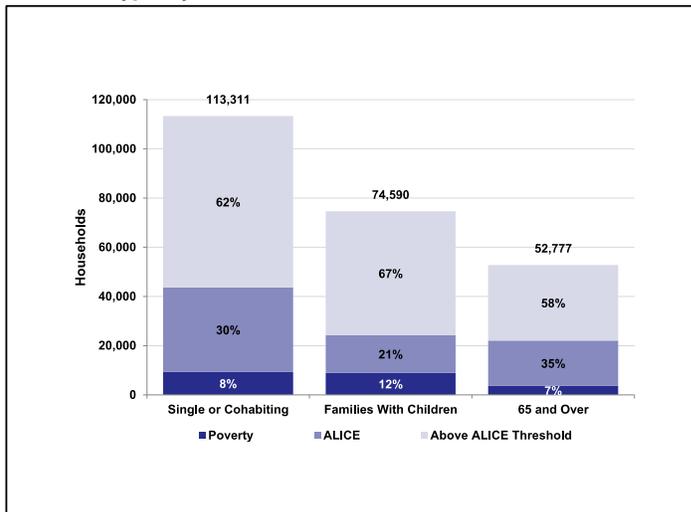
Households by Income, 2010 to 2017



What types of households are struggling?

The way Americans live is changing. There are more different family and living combinations than ever before, including more adults living alone, with roommates, or with their parents. Families with children are changing: There are more non-married cohabiting parents, same-sex parents, and blended families with remarried parents. The number of senior households is also increasing. Yet all types of households continue to struggle: ALICE and poverty-level households exist across all of these living arrangements.

Household Types by Income, 2017



Why do so many households struggle?

The cost of living continues to increase...

The Household Survival Budget reflects the bare minimum that a household needs to live and work today. It does not include savings for emergencies or future goals like college. In 2017, costs were well above the Federal Poverty Level of \$12,060 for a single adult and \$24,600 for a family of four. Family costs increased by 26 percent statewide from 2010 to 2017, compared to 12 percent inflation nationally.

Household Survival Budget, Kent County		
	SINGLE ADULT	2 ADULTS, 1 INFANT, 1 PRESCHOOLER
Monthly Costs		
Housing	\$549	\$823
Child Care	\$-	\$1,244
Food	\$199	\$604
Transportation	\$340	\$679
Health Care	\$236	\$888
Technology	\$55	\$75
Miscellaneous	\$164	\$491
Taxes	\$259	\$595
Monthly Total	\$1,802	\$5,399
ANNUAL TOTAL	\$21,624	\$64,788
Hourly Wage	\$10.81	\$32.39

...and wages lag behind

Employment and wages vary by location; firms generally pay higher wages in areas with a higher cost of living, although those wages still do not always cover basic needs. Employment and wages also vary by firm size: Large firms tend to offer higher wages and more job stability; smaller businesses can account for more jobs overall, especially in rural areas, but may pay less and offer less stability. Medium-size firms pay more but typically employ the fewest workers.

Private-Sector Employment by Firm Size With Average Annual Wages, 2017



Sources: 2017 Point-in-Time Data: American Community Survey, 2017. ALICE Demographics: American Community Survey and the ALICE Threshold, 2017. Wages: BLS, 2017. Budget: BLS, 2017; Consumer Reports, 2017; HUD, 2017; IRS, 2016, 2017; Michigan Department of Education Office of Great Start, 2018; Tax Foundation 2017, 2018; USDA, 2017.

Kent County, 2017		
Town	Total HH	% ALICE & Poverty
Ada Township	4,734	9%
Algoma Township	3,902	26%
Alpine Township	5,422	48%
Bowne Township	1,110	23%
Byron Township	8,271	33%
Caledonia Township	4,708	25%
Cannon Township	4,928	20%
Cascade Charter Township	6,916	15%
Cedar Springs City	1,269	52%
Courtland Township	2,733	18%
East Grand Rapids City	4,028	11%
Gaines Charter Township	9,397	33%
Grand Rapids Charter Township	6,310	17%
Grand Rapids City	73,434	52%
Grandville City	6,248	38%
Grattan Township	1,487	30%
Kentwood City	20,368	46%
Lowell Charter Township	2,506	33%
Lowell City	1,470	35%
Nelson Township	1,820	31%
Oakfield Township	2,191	25%
Plainfield Charter Township	12,921	32%
Rockford City	2,269	41%
Solon Township	2,547	35%
Sparta Township	3,367	45%
Spencer Township	1,561	40%
Tyrone Township	1,567	45%
Vergennes Township	1,452	16%
Walker City	10,078	43%
Wyoming City	27,915	46%

Note: Municipal-level data on this page is for County Subdivisions. Municipal-level data relies on 5-year averages and is not available for the smallest towns. Since there are missing geographies, totals will not match county-level numbers.

Household Income

Tables 6-1 through 6-3 illustrate the overall economic situation of Wyoming residents as owners or renters of housing. The largest group of owner-occupants has an annual income in the \$50,000 - \$74,999 tier, with the next largest groups falling on either side of that category. More than half of homeowners are in the broad range of \$35,000 to \$99,999. By contrast, the highest percentage of renters occurs with the next lowest tier of \$35,000 to \$49,999 and is matched on either side by nearly the same percentage of renters in the next highest and the next lowest annual income categories. More than half of all renters are an income step lower than owners, with annual incomes in the broad range of \$25,000 to \$74,999.

Table 6-2 shows a similar spread, as the largest number and percentage of owner occupants, 4,904 representing 26.9% of all owner-occupied units, show a monthly cost of between \$1,000 - \$1,499 while the largest number and percentage of renters, 4,343 representing 44.9% of renters, paid about half that amount, in the \$500 to \$799 range.

Table 6-3 offers the most detailed look at monthly housing costs as a percentage of income at various income levels, and further illustrates the differences among owners and renters at those specific levels.

The highest number and percentage of renters - more than one in four renters - are those in the lowest income category with annual incomes of less than \$20,000. For those households, nearly all (93.7%, or 2,572 households) are paying more than 30% of their income for housing. The next category of \$20,000 to \$34,999 is nearly as large, and shows housing costs of more than 30% for one in six renters.

These circumstances are not replicated for homeowners at any income level from lowest to highest. Over a third of owners (36.1%) have annual incomes of \$75,000 or more, and for all owners those paying more than 30% only approach the highest level at 7% in the two lowest income categories of less than \$35,000 per year.

Table 6-1. Wyoming Annual Household Income by Owner and Renter-Occupied Units, 2017

	Occupied Housing Units	Percent Occupied Housing Units	Owner- Occupied Housing Units	Percent Owner- Occupied Housing Units	Renter- Occupied Housing Units	Percent Renter- Occupied Housing Units
Less than \$5,000	679	2.4%	226	1.2%	453	4.7%
\$5,000 to \$9,999	979	3.5%	215	1.2%	764	7.9%
\$10,000 to \$14,999	1,360	4.9%	598	3.3%	762	7.9%
\$15,000 to \$19,999	1,491	5.3%	559	3.1%	932	9.6%
\$20,000 to \$24,999	1,217	4.4%	595	3.3%	622	6.4%
\$25,000 to \$34,999	3,548	12.7%	1,834	10.0%	1,714	17.7%
\$35,000 to \$49,999	4,265	15.3%	2,519	13.8%	1,746	18.1%
\$50,000 to \$74,999	6,756	24.2%	5,110	28.0%	1,646	17.0%
\$75,000 to \$99,999	3,732	13.4%	3,086	16.9%	646	6.7%
\$100,000 to \$149,999	2,732	9.8%	2,476	13.6%	256	2.6%
\$150,000 or more	1,156	4.1%	1,032	5.7%	124	1.3%
Median Household Income (dollars)	\$50,971	\$50,971	\$61,242	\$61,242	\$31,635	\$31,635

Source: US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

Table 6-2. Wyoming Monthly Housing Costs by Owner and Renter-Occupied Units, 2017

Housing Cost	Occupied Housing Units	Percent Occupied Housing Units	Owner-Occupied Housing Units	Percent Owner-Occupied Housing Units	Renter-Occupied Housing Units	Percent Renter-Occupied Housing Units
Less than \$300	1,222	4.4%	1,010	5.5%	212	2.2%
\$300 to \$499	3,502	12.5%	3,231	17.7%	271	2.8%
\$500 to \$799	7,852	28.1%	3,509	19.2%	4,343	44.9%
\$800 to \$999	6,249	22.4%	3,680	20.2%	2,569	26.6%
\$1,000 to \$1,499	6,595	23.6%	4,904	26.9%	1,691	17.5%
\$1,500 to \$1,999	1,539	5.5%	1,337	7.3%	202	2.1%
\$2,000 to \$2,499	393	1.4%	369	2.0%	24	0.2%
\$2,500 to \$2,999	169	0.6%	169	0.9%	0	0.0%
\$3,000 or more	45	0.2%	41	0.2%	4	0.0%
No cash rent	349	1.3%	(X)	(X)	349	3.6%
Median (dollars)	838	838	884	884	789	789

Source: US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

Table 6-3. Monthly Housing Costs as a Percentage of Household Income (past 12 months), 2017

Monthly Housing Cost as a Percentage of Household Income in the Past 12 Months	Occupied Housing Units	Percent Occupied Housing Units	Owner-Occupied Housing Units	Percent Owner-Occupied Housing Units	Renter-Occupied Housing Units	Percent Renter-Occupied Housing Units
Less than \$20,000	4,258	15.3%	1,514	8.3%	2,744	28.4%
Less than 20 percent	59	0.2%	49	0.3%	10	0.1%
20 to 29 percent	360	1.3%	198	1.1%	162	1.7%
30 percent or more	3,839	13.8%	1,267	6.9%	2,572	26.6%
\$20,000 to \$34,999	4,696	16.8%	2,429	13.3%	2,267	23.5%
Less than 20 percent	841	3.0%	781	4.3%	60	0.6%
20 to 29 percent	1,028	3.7%	426	2.3%	602	6.2%
30 percent or more	2,827	10.1%	1,222	6.7%	1,605	16.6%
\$35,000 to \$49,999	4,139	14.8%	2,519	13.8%	1,620	16.8%
Less than 20 percent	1,401	5.0%	1,203	6.6%	198	2.0%
20 to 29 percent	1,782	6.4%	703	3.9%	1,079	11.2%
30 percent or more	956	3.4%	613	3.4%	343	3.5%
\$50,000 to \$74,999	6,710	24.0%	5,110	28.0%	1,600	16.6%
Less than 20 percent	3,992	14.3%	3,141	17.2%	851	8.8%
20 to 29 percent	2,285	8.2%	1,611	8.8%	674	7.0%
30 percent or more	433	1.6%	358	2.0%	75	0.8%
\$75,000 or more	7,578	27.1%	6,594	36.1%	984	10.2%
Less than 20 percent	6,661	23.9%	5,717	31.3%	944	9.8%
20 to 29 percent	863	3.1%	823	4.5%	40	0.4%
30 percent or more	54	0.2%	54	0.3%	0	0.0%
Zero or negative income	185	0.7%	84	0.5%	101	1.0%

Source: US Census Bureau American Community Survey (ACS) 2017 5-year Estimates

Gross Rent

The cost burden on Wyoming’s renter households is illustrated by examining the percentage of their household income paid for monthly rent. The percentage of cost-burdened renter households increased by more than six percent in the 2014 to 2017 period, with nearly half (49.9%) of renter households paying more than 30% of their monthly income on housing costs.

Table 6-4. Gross Rent as a Percentage of Household Income, 2014-2017

Gross Rent	2014	%	2017	%
Occupied units paying rent*	9,014		9,316	
Units where cost can be computed	8,853		9,215	
Less than 15%	976	11.0%	1,038	11.3%
15.0 to 19.9%	1,243	14.0%	1,025	11.1%
20.0 to 24.9%	1,281	14.5%	1,298	14.1%
25.0 to 29.9%	1,181	13.3%	1,259	13.7%
30.0 to 34.9%	791	8.9%	1,111	12.1%
35% or more	3,381	38.2%	3,484	37.8%

* The ACS count of 9,316 for “Occupied units paying rent” is similar to, but distinct from the count of 9,665 for “renter-occupied units” reported elsewhere in the ACS.

Source: US Census Bureau American Community Survey (ACS) 2014, 2017 5-year Estimates

The high cost of rental housing and the increasing burden those costs place on tenants present a barrier to housing choice. With rental households making up a third of Wyoming’s population, this points to a particular need for the City to focus on actions that can be taken to assist renters in obtaining and maintaining housing.

Homelessness

Homeless individuals (including unaccompanied youth), families with children, and students in the Wyoming community are served by the Grand Rapids Area Coalition to End Homelessness/HUD Continuum of Care, the Kent County system of agencies and housing providers that focuses on moving homeless persons into housing. In 2018, the population categories noted above added up to more than 10,000 persons in Kent County who were homeless or at severe risk of losing their housing.

The number of homeless persons in Kent County, including adults, unaccompanied youth, and families with children grew by slightly over seven percent during the four-year period from 2015 through 2018, from 9,828 (2015) to a total of 10,538 in 2018.³⁷

Wyoming is served by six ZIP codes, with two postal ZIP codes (49509 and 49519) that generally equate to the City of Wyoming. Information from the Michigan Coalition Against Homelessness (MCAH) obtained from the Kent County Coalition to End Homelessness/Continuum of Care indicates that in 2015, a total of 729 homeless individuals reported their last address as either the 49509 or the 49519 ZIP code area. By 2018, that number had grown by 122 individuals or 16.7%, a rate of increase that is more than twice the rate of increase reported throughout the entire county in the same period.

³⁷ Kent County Continuum of Care/Coalition to End Homelessness, Overall Homeless Count; Category 1 and Category 2; MI Coalition Against Homelessness, 2015, 2018.

Table 6-5. Homeless Population Kent County and Two of Six Wyoming ZIP codes: 49509 and 49519, 2015-2018

Year	Kent County	% Change	Wyoming	% Change	49509	% Change	49519	% Change
2015	9,828		729		407		322	
2016	9,088	-7.5%	614	-15.8%	365	-10.3%	249	-22.7%
2017	8,590	-5.5%	552	-10.1%	333	-8.8%	219	-12.1%
2018	10,538	22.7%	851	54.2%	535	60.7%	316	44.3%
2015-2018	710	7.2%	122	16.7%	128	31.5%	-6	-1.9%

Source: Michigan Coalition Against Homelessness; Overall Homeless Count FINAL 2015-2018

The data indicates distinct differences between Wyoming’s two main postal ZIP codes, 49509 and 49519, in both the numbers of overall homeless persons and children in families, and in the rates of change in those specific populations and geographies.

Four additional ZIP code areas serve portions of Wyoming along with larger portions of neighboring communities: 49503 (shared mainly with Grand Rapids), 49508 and 49548 (shared mainly with Kentwood), and 49418 (shared mainly with Grandville). Because sizable portions of these areas are outside of Wyoming, information regarding the homeless population in those areas is less relevant to this local analysis, but can be useful as a comparison. Totaling data available from MCAH regarding homeless individuals who reported their last address in the four additional ZIP codes listed, the 2015 total of 3,148 persons increased to 3,409 in 2018, half the rate of combined increase in 49509 and 49519.

Data regarding the 49509 area showed an increase in persons reporting 49509 as their last address from 407 in 2015 to 535 people in 2018, a growth rate of 31%. The number of children under 18 years in 49509 were consistent over the same period, numbering 150 and 147 children in the three-year period 2016-2018.

Data for the neighboring 49519 ZIP code area along Wyoming’s western edge show a markedly different dynamic. Homeless persons reporting 49519 as their last address actually decreased slightly, from 322 to 316, from 2015 through 2018. Children in families grew, however, from 106 to 137 children under 18 years. This rate of growth, at 29.25%, is significant even though the actual number, an increase of 31 children, is modest.

Families with Children

Throughout Kent County, most of the persons identified as homeless in 2018 were in families with adults and children – 61.5%, or 6,480 of the total 10,538 homeless population. From 2015 through 2018, that number decreased by two percent, or 156 individuals. While the number of homeless Kent County adults in families grew by just over 12%, the number of children in those families decreased by the same amount during that time.

Table 6-6. Homeless Children in Families: ZIP codes 49509 and 49519, 2016-2018

Zip code	2016	2018
49509	150	147
49519	106	137
Total	256	284

Source: Michigan Coalition Against Homelessness; Overall Homeless Count FINAL 2016-2018

In Wyoming’s two primary ZIP codes shown in Table 6-6, however, there was an increase in children in families experiencing homelessness as measured from 2016 through the end of 2018.³⁸ MCAH Annual Count data shows a 2018 total of 284 children under the age of 18 in families, representing an 11% increase of 28 children in the three-year period. This growth in homeless children in families is less than the rate of overall homeless population growth in Wyoming, and higher than the rate of countywide growth in the overall homeless population.

Homeless Students

Table 6-7 shows the breakdown by school district of the total of 300 students in Wyoming’s seven school districts who were homeless in 2018, according to data provided by the Kent Intermediate School District.

As shown in Table 6-8, most of the students classified as homeless in 2018 report that they are doubled up, likely staying with friends or in some cases with extended family. The rest were staying in transitional housing, shelters, hotels or motels, or were unsheltered in the case of seven students.

Information provided by the Michigan Coalition Against Homelessness, and from the Kent Intermediate School District as to numbers of homeless students from these seven Wyoming school districts, taken together indicate that the city is not immune to the issues of housing cost, and various other factors that negatively affect household stability and contribute to homelessness. No homeless services or shelters were identified in this analysis within Wyoming’s borders. While Wyoming is an active participant in the countywide network of homeless service providers committed to the challenge of housing the homeless, the level of homelessness affecting the Wyoming community, as indicated by the school district data as well as the continuum of care data related to zip codes 49509 and 49519, may warrant more focused attention at the local level.

Table 6-7. Homeless Students & Unaccompanied Youth, By School District, 2018

District Name	Homeless Students	Unaccompanied Youth	Total Students	Percentage
Godfrey-Lee Public Schools	68	6	2,031	3.4%
Godwin Heights Public Schools	21	0	2,318	0.9%
Grandville Public Schools	38	2	5,942	0.6%
Kelloggsville Public Schools	49	4	2,697	1.8%
Wyoming Public Schools	74	21	4,744	1.6%
Byron Center Public Schools	16	1	4,186	0.4%
Kentwood Public Schools	281	42	10,296	2.7%
Totals	547	76	30,384	

Source: Kent Intermediate School District

³⁸ Data regarding the age of children by ZIP code and range of years is not available for the 2015 year.

Table 6-8. Primary Nighttime Residence of Homeless Students, By School District, 2018

District Name	Primary Nighttime Residence	Student Count
Godfrey-Lee Public Schools	Doubled-Up	120
	Hotel/Motel	9
	Shelters	8
	Transitional housing	6
	Unsheltered	1
Godwin Heights Public Schools	Doubled-Up	33
	Hotel/Motel	10
	Shelters	3
Grandville Public Schools	Doubled-Up	10
	Hotel/Motel	15
	Shelters	1
	Transitional housing	5
Kelloggsville Public Schools	Doubled-Up	37
	Hotel/Motel	11
	Shelters	2
	Transitional housing	5
	Unsheltered	1
Kentwood Public Schools	Doubled-Up	240
	Hotel/Motel	22
	Shelters	16
	Unsheltered	3
Byron Center Public Schools	Doubled-Up	16
Wyoming Public Schools	Doubled-Up	90
	Hotel/Motel	27
	Shelters	6
	Transitional housing	3
	Unsheltered	2

Source: Kent Intermediate School District

Section 7. Public Sector

Fair housing choice for residents and homeseekers in Wyoming is impacted by a number of factors in the public sector, including public housing authority policies and practices; the extent and geographic location of publicly-subsidized housing units; land use and zoning regulations, policies, and practices; construction and building codes; and the provision of government services. Local decision-making concerning policies and resources, along with effective implementation and public accountability, are important considerations affecting the range and accessibility of housing options available to a diverse population.

City of Wyoming

Steering Committee members met in April 2019 and expressed their desire for Wyoming's leaders to be less timid or cautious about taking on bold actions for the community.

With regard to housing, the lack of quality affordable and accessible housing was the top issue identified by the Steering Committee. Comments highlighted a need for workforce housing that is affordable to low and middle-income wage earners that would allow them to live close to their jobs. In addition, Steering Committee members discussed a need for senior housing and to maintain the overall quality of Wyoming's existing housing stock. Another concern among committee members was a perceived lack of diversity amongst City leaders and staff, which does not reflect the demographics of Wyoming's population.³⁹

The most pressing issue discussed by those who attended a Community Workshop on May 2, 2019 was the need for affordable housing to counteract increasing housing costs. Multiple participants shared the need for affordable owner-occupied homes for all income levels. The need for additional mixed-use apartments to meet housing demand was also identified with some participants noting that many single-family homes are being rented. Other items discussed included issues with property maintenance related to absentee property owners, the concentration of rental properties in certain areas, the need for stricter rental code enforcement, and the need for additional senior housing and community centers in response to an aging population.⁴⁰

Community Development Block Grant Programs

Programs supported by and through Wyoming attest to the community's strong interest in housing as a key component of their quality of life for a diverse and growing city.

The City's CDBG programming is informed by a Community Development Committee, a Council-appointed group of Wyoming residents who advise City officials, assist in formulation and recommending approval to the City Council of the Five-Year Regional Consolidated Plan, and recommend priorities for the annual CDBG budget.

The City's most recent Community Development (CDBG) Action Plan outlines the programs to be initiated in the 2019-2020 fiscal year in accordance with the 2016-2020 Kent County and Cities of Grand Rapids and Wyoming Regional Consolidated Plan, a five-year joint planning document adopted by three CDBG entitlement communities.

³⁹ Wyoming [re]Imagined Master Plan; Steering Committee Orientation & Initiation Meeting Summary April 23, 2019

⁴⁰ Wyoming [re]Imagined Master Plan; Community Workshop Summary May 2, 2019 and Wyoming [re]Imagined Master Plan; Community Workshop Comments May 2, 2019

The City expects to have a total of \$733,907 available for CDBG program support during the July 2019 – June 2020 period, consisting of \$522,135 in an estimated annual entitlement HUD grant, \$90,722 in carryover funds from the previous year, and \$121,000 from anticipated program income.

The City's goals for the 2019-2020 year are as follows:

- Improve the condition of existing housing;
- Improve access/stability of affordable housing;
- Reduce blight and code violations;
- Enhance infrastructure and public facilities;
- Increase access to jobs, education, & other service; and
- Increase economic opportunities.

As noted in the City's Action Plan, Wyoming is an active participant in area- and county-wide activities to "enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies." The report goes on to explain:

"The City will continue to work with other City departments, neighboring cities, Kent County and area housing non-profits such as the Fair Housing Center of West Michigan (FHCWM), Home Repair Services, The Heart of West MI United Way, the Salvation Army Social Services, Family Promise of Grand Rapids and ICCF (Inner City Christian Federation). The City also works with Disability Advocates of Kent County. The Director of Community Services is active with the Grand Rapids Area Coalition to End Homelessness/HUD Continuum of Care to address issues of homelessness and affordable housing."

Wyoming includes a broad range of residents and organizations in its annual planning process, along with a Draft Plan publication and advertised opportunities for public comment. No public comments were received during the period of review.

Fair Housing Center of West Michigan

Wyoming enhances other philanthropic, state, and federal funding through advocacy and additional funds for fair housing services available through FHCWM. As a private regional fair housing center, FHCWM is a member of the National Fair Housing Alliance and has access to the most current information regarding fair housing laws, HUD regulations and directives, and legal enforcement standards by government and private practitioners. The Center is currently a participant in HUD's Fair Housing Initiatives Program (FHIP) due to its recipient status in the program's multi-year competitive funding process. According to HUD, "Better outcomes are found for FHIP-investigated cases, particularly those cases in which the FHIP organization is a listed complainant, and may be related to testing conducted by FHIP organizations".⁴¹

Additional information regarding the role of private fair housing centers and the HUD FHIP program is included in Appendix: US Department of Housing & Urban Development (HUD) Office of Policy Development and Research Study of the Fair Housing Initiatives Program Executive Summary 2011: The Role of Private Fair Housing Centers.

⁴¹ US Department of Housing & Urban Development (HUD) Office of Policy Development and Research Study of the Fair Housing Initiatives Program Executive Summary 2011

The Center supports Wyoming through both contracted services and its organizational mission in their efforts to ensure housing opportunity throughout the community, and offers group and individual education to housing and property industry professionals, specialized training to housing providers, and evidentiary testing services to assist in the resolution of complaints received by the City or the Center.

The Wyoming website currently offers the following notice of fair housing training:

Posted on Tuesday, May 14, 2019 | Press & Media, News & Announcements

The City of Wyoming will host a seminar for rental property owners and housing professionals on Monday, May 20 from 9am to noon.

Free and open to the public, the City of Wyoming invites residents to learn more about housing-related topics. The seminar will take place in the Wyoming Senior Center Community Room, 2380 De Hoop Ave. SW.

Designed for Wyoming landlords, rental agents, property management personnel, real estate agents and residents, the three-hour training seminar will provide practical, up-to-date information to assist housing professionals in their daily compliance with fair housing laws and provide information on local agencies and resources who address various housing-related needs.

Topics and speakers include:

- “HAP Contracts vs. Lease Agreements – what you need to know as a landlord relative to Section 8” will be presented by the City of Wyoming Public Housing Commission;
- “Fair housing practices update – what are your responsibilities & how are you affected?” will be presented by the Fair Housing Center of West Michigan; and
- “City of Wyoming rental inspections program update – Including Manufactured Housing inspections” will be presented by the City of Wyoming Building Inspections Department.

The Rental Property Owners Association and Wyoming Building Inspections Department will be available after the sessions to answer any questions. To register, please call 616.530.3164.

A continental breakfast will be served. Seminar completion certificates will be provided upon completion. The educational seminar is sponsored by the Wyoming Community Development Department and the Rental Property Owners Association.

Wyoming’s ability to fund enhanced fair housing services through CDBG resources is limited by federal regulations imposed on CDBG expenditures, confining enforcement and education services to the City’s low- and moderate-income areas. Minority home seekers or those with a disability who aspire to live in higher-income areas of Wyoming may be aware of fair housing laws and discriminatory practices, however services available for testing required to gather evidence related to their situation may not be available.

**Figure 7-1.
Wyoming Housing Commission Jurisdiction Map 2019**

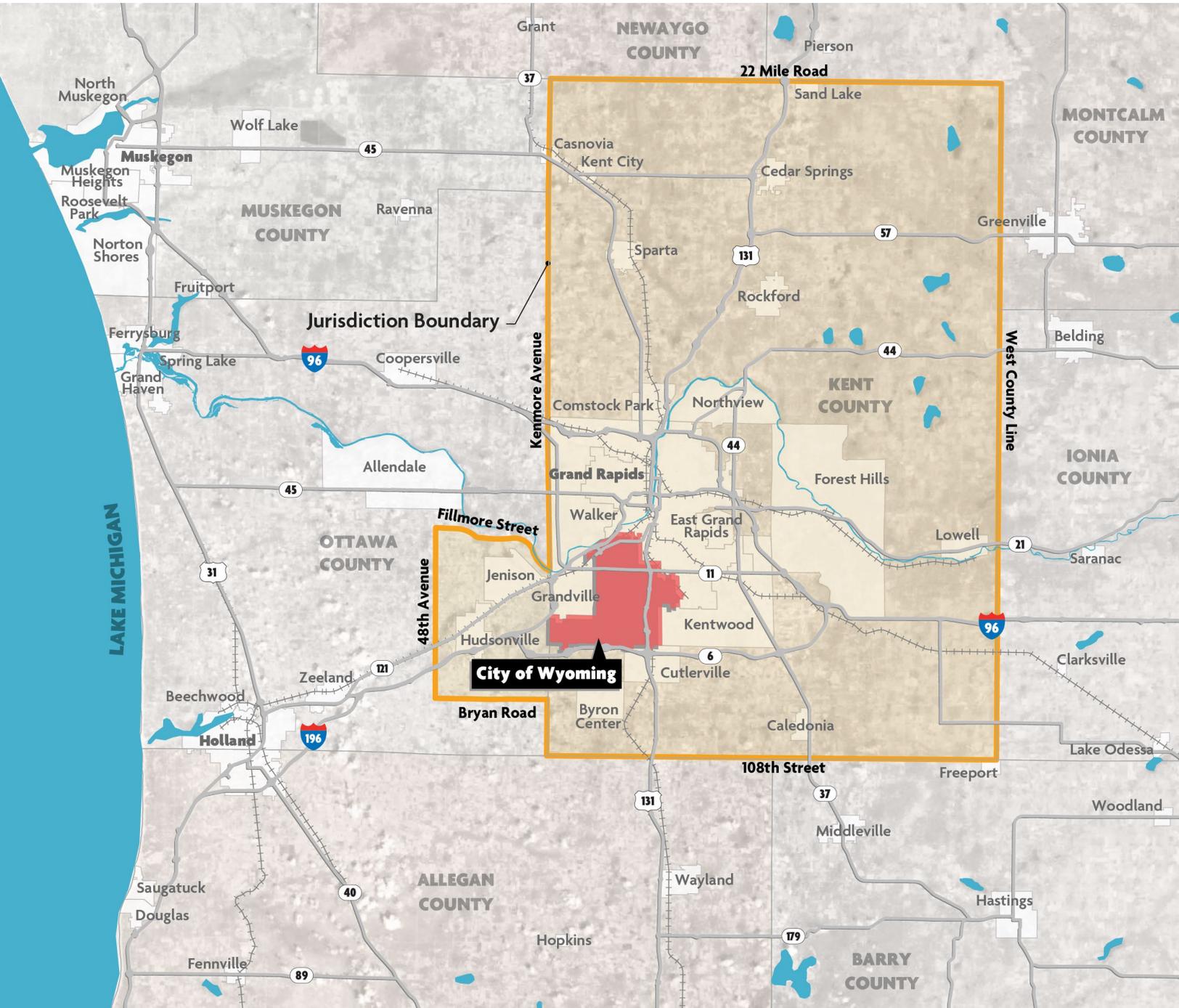


Figure 7-1 illustrates the jurisdiction of the Wyoming Housing Commission.

Source: Wyoming Housing Commission; 2019

Additional Affordable Housing

Additional affordable housing in the Wyoming area is made possible through various programs supported by HUD and the Michigan State Housing Development Authority (MSHDA) as described in MSHDA's online Affordable Rental Housing Directory.

Table 7-1. Affordable Rental Housing Directory – Wyoming, MI

54th Street Apart 178 54Th St (616) 248-5277	Hope Network Po Box 890 (616) 301-8000	54th Street LDHA LP 3075 Orchard Vista SE 616-301-8000	Mi-Home / LIHTC	MSHDA_AM - MSHDA
54th Street Apartments II 180 54Th Street	Hope Network 3075 Orchard Vista Drive (616)-248-5237	54th Street LDHA LP 3075 Orchard Vista SE 616-301-8000	LIHTC	MSHDA
Bayberry Farms 2520 56Th St. SW (616) 531-1525	Affinity Property Management 102 S Main Street (989) 772-3261	Bayberry Farms LDHA LP	TEAM	MSHDA_AM
David's House 2390 Banner St SW 616-247-7861	David's House Ministries 867 Belfield SW St (616) 243-5285	David's House 2390 Banner Dr SW (616) 726-1703	202/8 Direct Loan/ Elderly-Handicapped	HUD
Kent Residential Center 3210 Gladiola SW 616-538-3067	Kent Residential Centers Nonprofit Housing 1225 Lake Drive SE (616) 774-0853	Kent Residential Centers Nonprofit Housing 1225 Lake Drive SE (616) 774-0853		HUD
Oak Forest 3614 Pine Oak Ave (616) 805-0317	IDC Management Corp 28W340 Flanders Ln 630-780-4535	Oak Forest Apartments LP 28W340 Flanders Ln 630-780-4535	LIHTC (Other)	MSHDA
Oak Valley and Pinery Woods Apartments 2867 Oak Valley Ave SW	Cambridge Partners, Inc. 3300 E Paris SE 616-956-7722	Oak Valley Associates 2867 Oak Valley SW 616-956-7722	223(F) Refi/ Purchase Apartments	HUD
Parkcrest Apartments 1961 Parkcrest Drive	Land & Co. 1701 Porter Street, Suite 6 616-534-5792	Parkcrest, L.L.C. 1701 Porter Street SW, Suite 6 616-534-5792	223(A)(7) Refi Of 223(F) Apartments	HUD
Parkcrest Apartments Phase II 5671 Keegan Ave SW	Land & Co. 1701 Porter Street, Suite 6 616-534-5792	Parkcrest #2 LLC 1701 Porter Street SW Suite 6 616-534-5792	223(F) Refi/ Purchase Apartments	HUD

Pine Oak 850 36Th St, SW 616-531-0380	Medallion Management CO 834 King Hwy, Suite 100 269-381-0350	Wyoming Pine Oak LDHA LP 834 King Highway, Suite 100 269 381-0350	TAXEX Sect 236 PRESERV / Rent Sup / LIHTC	MSHDA_AM - MSHDA - HUD
Pinery Park Apts 2300 Newstead Ave SW 616-452-8758	Sage Apartment Communities, Inc. 19772 Macarthur Blvd, Ste 100 949-440-2310	Pinery Park Apartments, LLC 19772 Macarthur Blvd., Suite 100 (949) 440-2310		HUD
Villa Esperanza 1446 44Th St SW 616-530-0883	Dwelling Place of Grand Rapids INC 101 Sheldon Blvd SE Suite 2 (616) 454-0928	Sawkaw INC 1446 44Th St SW (616) 530-0883	223(F) Refi/ Purchase Apartments	HUD

Source: Michigan State Housing Development Authority website 2019

The Affordable Rental Housing Directory (ARHD) published online by the Michigan State Housing Development Authority (MSHDA) is based on a data sharing agreement between HUD, MSHDA, and US-RD to provide a listing of each agency’s rental housing data within the state of Michigan. For Wyoming, the site lists 12 locations, with information about each location available on the MSHDA website by clicking on the site name on the MSHDA website.

Wyoming Public Housing

According to the City of Wyoming website, the mission of the Wyoming Housing Commission (WHC) is to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination.

Their mission is further described in planning documents submitted to the Department of Housing & Urban development as follows:

- Provide safe, decent and sanitary housing conditions for very low-income families;
- Manage resources efficiently; and
- Promote personal, economic and social upward mobility to provide families the opportunity to make the transition from subsidized to non-subsidized housing.

Housing Units

The WHC owns 195 public housing units, located at Westwood Apartments, Waldon Woods, and scattered locations throughout Wyoming. Individuals and families living in those sites pay rent directly to the WHC based on their income.

Table 7-2. Wyoming Housing Commission Units, May 2019

Item	Occupied or In Use	Vacant or Not in Use
Waldon Woods	43	2
Westwood	86	0
Scattered sites	61	3
Total Owned	190	5

Source: Wyoming Housing Commission

Housing Choice Vouchers

The Commission also administers 1,157 Housing Choice Vouchers (Section-8) within Kent County and part of Ottawa County. The families and individuals who receive the vouchers pay a portion of their income for rent and the WHC pays the remainder (up to the limits set by the Department of Housing and Urban Development - HUD) directly to the landlords each month.

Table 7-3. Wyoming Housing Commission Vouchers, July 2019

Voucher Type	In Use	Not in Use
035	15	20
054	846	162
099	92	8
Homeownership	14	-
Total Vouchers	967	190

Source: Wyoming Housing Commission

Demographics

Demographics of the WHC participants living in City-owned properties or using Section 8 vouchers are maintained according to race and national origin for all households, and identify those households that include a person with a disability. Certain household or personal characteristics such as age or having a disability may qualify eligible households for particular types of housing subsidy. For this reason, the WHC waiting list does not move in a strict numerical order of acceptance onto the list; rather it moves according to order of acceptance combined with unique household factors connected to particular subsidy categories that may affect their position on the list.

Table 7-4. Wyoming Housing Commission, Participants by Race, Ethnicity, and Household and Disability Status, May 2019

Item	Households	Households with Person with Disability
Race		
American Indian/ Native Alaska	2	1
Asian	3	2
Black/ African American	680	374
Native Hawaiian/Islander	1	0
White	296	157
Total	982	534
Ethnicity		
Hispanic	106	49
Non-Hispanic	876	485
Total	982	534

Source: Wyoming Housing Commission

The WHC is designated by HUD as a High Performing Public Housing Authority (PHA), defined as, “A PHA that both owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment Systems (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.”⁴²

WHC’s Five-Year Plan, submitted and approved in 2014, directly addresses housing needs in their plan according to the following HUD directives:

9.0 Housing Needs

Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

In response to HUD directive 9.1: Strategy for Addressing Housing Needs, the Commission outlines their strategy as follows:

- Reducing unit turnover time in public housing;
- Increase Section 8 lease-up rates by utilizing payment standards that will enable families to find suitable housing in the jurisdiction;
- Employ an admission preference in public housing that targets working families;
- Affirmatively market to local no-profit agencies that assist families with disabilities;
- Counsel Section 8 residents as to location of units outside of areas of poverty (or) minority concentration and assist them to locate those units;

⁴² Streamlined Annual PHA Plan, US Dept of Housing & Urban Development Office of Public & Indian Housing OMB No.2577-0226

- Encourage all Section 8 voucher holders to participate in the Family- Self Sufficiency (FSS) Program;
- Apply for any vouchers that WHC may be eligible (for);
- Expand out inventory in public housing as the budget and availability permits; and
- Apply for any grant programs to assist WHC, which would include RAD (Rental Assistance Demonstration).

WHC outlines several goals and objectives in their current 5-Year Plan, covering the period 2015 through 2019, including the following:

- Maintain public housing vacancy at 2% or less;
- Complete 100% of emergency work within 24 hours;
- Utilize (the) 98% of the voucher allocation or budget authority;
- Apply for any additional vouchers which may become available;
- Increase public housing inventory to the extent possible;
- Support families in their goal to obtain homeownership by having a minimum of five combined closings in both homeownership programs; and
- Increase the number of FSS participants to 125 or higher.

The plan also notes, “It is our objective to work with others to prevent offenses covered by the Violence Against Women Act (VAWA) to the degree we can. WHC refers victims to YMCA (sic), United Way, Mel Trotter crisis center etc. We brief all new participants of their rights prior to entering the program and are always available for private consultation.”

Although WHC is a critical component of Wyoming’s housing system affecting low- and moderate-income households, its goals and objectives as reported to HUD do not specifically address the homeless population. Several items of the commission’s Strategy for Addressing Housing Needs and also their goals and objectives relate in an indirect, but practical manner to homelessness issues including domestic violence, supply of subsidized housing and housing assistance vouchers, and availability of existing subsidized housing.

The Commission’s most recent Annual Plan submission to HUD reports the following progress at item B.3:

- The Wyoming Housing Commission continues to improve on our services throughout our development. Due to our commitment to provide safe, decent, and affordable housing to our participants, WHC has focused our attention on our physical condition standards for our developments to meet a higher caliber for our residents’ units. These standards address the following areas: site, building exterior, building systems, dwelling units and common areas of our public housing units. With due diligence, WHC maintains a high score under the physical indicator on our Public Housing Assessment System (PHAS) this year. This PHAS assessment consists of HUD reviewing not only our physical conditions, but also our financial, management and capital status. WHC’s score remains at 92 out of 100 as a High Performer status;
- WHC continues to work toward assisting our participants to connect with our homeownership program to continue to keep the American dream alive. During the period April 2017 through March 2018, the WHC was able to assist three Housing Choice Voucher (HCV) participants to purchase their own home through our homeownership program. Currently, WHC has seven families that are actively working toward homeownership;
- The WHC continues to encourage our HCV families to participate in our Family Self-sufficiency (FSS) program. WHC had 108 participants enrolled at the end of our fiscal year, March 2018. The WHC has a goal of enrolling 125 families in the FSS program at the end of the 2019 fiscal year;

- Such events – six FSS orientations and three Homeownership Orientations – assist our participants in becoming self-sufficient, which in turn enables them to graduate from the program and possibly remove them from housing assistance after graduation. WHC has had 31 participants that graduated this fiscal year and were able to collect a grand total of \$85,514 between the 31 graduates;
- Fifteen requests were granted to participants for withdrawals under program guidelines, disbursing \$26,642 toward school enrollment and books, tuitions, car repairs, appliances and vehicle purchase;
- WHC was 90% leased with its vouchers. WHC was only able to assist that percentage because we used 101% of funding, resulting in WHC tapping into our reserves to assist those in need; and
- During the 2018 fiscal year, WHC Public Housing Program increased our occupancy rate to 99%, staff is determined to maintain a high percentage rate. WHC staff continues to use our recently developed vacancy tracker to improve our vacancy rate, which is effectively assisting WHC staff in the right direction and evident in our occupancy rate increase.

The Commission also reports providing support for two Low Income Housing Tax Credit (LIHTC) projects in Grand Rapids. In partnership with Samaritas, WHC has offered conditional commitment to provide eight Section 8 Project Based vouchers for a fifteen-year period to the development of 52 new senior apartments at St. Joe’s Seminary, 600 Burton SE. In partnership with Inner City Christian Federation (ICCF), WHC has offered conditional commitment to provide thirteen Section 8 Project-Based vouchers for a fifteen-year period to the development of 54 new senior apartments at Division Avenue and Logan Street.

Based on structured interviews with Rebeca Venema, WHC Executive Director, and Christine Johnstone, Administrative Aide, the Commission reports a strong record of carrying out their role in providing safe and affordable housing provision. WHC supports programs to increase self-sufficiency and help families move into homeownership. The Commission partners with neighboring Kent County and Grand Rapids Housing Commissions to increase the impact of the Section 8 Voucher program throughout the entire county, and into adjacent Ottawa County areas (See Figure 7-1).

Records supplied by WHC staff detailed participants in the Commission’s housing programs, and discussed tenant selection processes, cooperation with jurisdictions outside of Wyoming, and assistance to households in obtaining housing. The Commission has not received any fair housing complaints; nor has a state or federal enforcement agency reported any fair housing complaints concerning WHC housing, marketing, or tenant selection.

During the period of this analysis a total of seven building and occupancy complaints have been registered regarding Westwood Apartments, the property where the Commission office is located. The nature of those complaints is not fully described, but the results indicate that each has been closed (one), resolved (two), or labeled as “No Violation” (four). Three complaints were filed on Waldon Woods Apartments, with two complaints labeled “Closed” and one labeled “No Violation.”

The Commission does not track concentrations of racial or ethnic populations in its housing assistance programs. Records describing participant demographics are not correlated with geographic address, and therefore information regarding areas of minority concentration is not available to home seekers or WHC staff.

WHC’s published strategy includes the intent to “Counsel Section 8 residents as to location of units outside of areas of poverty (or) minority concentration and assist them to locate those units.” Collecting, maintaining and updating demographic and geographic data describing the general population and the location of WHC participants by all areas served could assist the Commission in the identification of poverty or minority concentrations, and support their geographic counseling activities.

Zoning, Building & Occupancy Codes

This section of the Analysis is intended to explore those limitations, if any, affecting residents and homeseekers based on local Zoning Codes and Building Codes.

Zoning

Urban and suburban zoning is an important issue as a shortage of available, affordable housing spreads across metropolitan regions throughout the nation. In an August 2019 article posted by the website Building Design + Construction: Cities modify density zoning to spur more affordable housing projects: Solutions include eliminating single-family zoning and allowing taller apartments in higher-density zones, Contributing Editor Peter Fabris states, “With housing affordability reaching crisis proportions in many cities, local officials are implementing new zoning regulations to catalyze more home construction.”⁴³

The American Planning Association’s Housing Initiative identifies the following six principles guiding their Action Agenda.⁴⁴

Modernize state planning laws: Update state laws to promote local planning efforts and provide housing resources to solve [our] most pressing affordability challenges.

Reform local codes: Modernize codes and rules to respond to the growing need for more housing – no matter the type or cost.

Promote inclusionary growth: Provide everyone with a fair opportunity to access affordable housing and economic prosperity, while addressing the effects of gentrification.

Remove barriers to multifamily housing: Adopt local plans that not only expand family housing choices but also make them easier and more affordable to access.

Turn NIMBY into YIMBY: Transform community engagement and involve everyone in the planning process from the start.

Rethink finance: Promote innovative thinking about how to fund affordable housing in the future.

Increasingly, desirable housing is understood as housing that is affordable, and proximate to employment, education, and the myriad services that contribute to residential quality of life. To the extent that zoning regulations limit the production of contemporary housing styles apart from detached, single-family units, the regulations themselves may come to be seen as barriers to housing choice.

⁴³ Building Design+Construction; Codes and Standards, Peter Fabris, Contributing Editor, August 9, 2019, www.bdcnetwork.com

⁴⁴ American Planning Association; Planning Home: American Planning Association Housing Initiative, Breaking Barriers, Finding Solutions, www.planning.org/home/action

Figure 7-2. Current Zoning

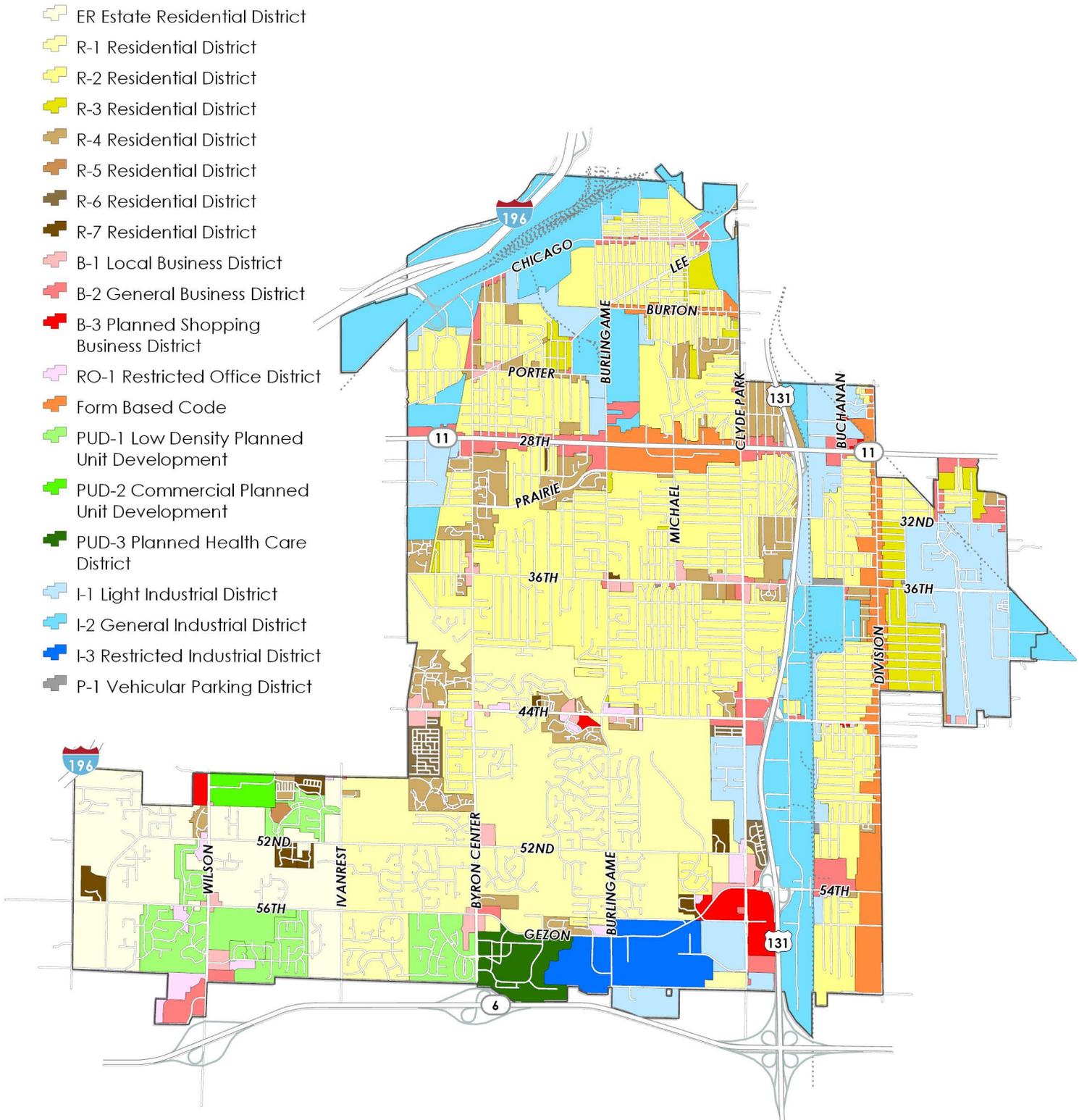


Figure 7-2 illustrates zoning districts of Wyoming, MI.

According to the City's website, the Community Services Department divides their efforts among five key areas: Building Inspections, Community Development, Downtown Development, Economic Development, and Planning. Planning is responsible for both the current and long-range administration of community land use laws and adopted comprehensive plans. These include the Zoning Ordinance, Form Based Code, Subdivision Ordinance and the Land Use Plan 2020. As noted on the website, the Planning staff serves the Wyoming City Council, the City Manager's office, the Planning Commission and Board of Zoning Appeals by providing professional recommendations pertaining to development proposals, rezonings, amendments to the Zoning Ordinance and Land Use Plan, and variance requests. The Planning staff facilitates the multi-departmental review for all developments in the City, except for single-family housing.

A review of Wyoming's Zoning map reveals the fact that most of Wyoming is zoned as Residential, in zones labeled from R1 to R7, and that single-family housing is the most predominant housing type. According to US Census Bureau 2017 ACS data, approximately two-thirds of Wyoming's housing is owner-occupied and one-third is renter-occupied.

Form Based Code

In addition to its more traditional zoning ordinance, Wyoming has a Form Based Code (FBC) covering three key areas of the City: Division Avenue, Burton Street, and the designated downtown area of the 28th Street Corridor. Adopted in 2013 and amended in 2016 and 2018, the form based codes are described in the Code's Introduction as, "Development regulations (a type of zoning code) that emphasize the physical character of development (its form) and de-emphasize the regulation of land use." The Code, explained at Purpose: Chapter 90-1101, is intended to support redevelopment in designated FBC areas through the establishment of building type standards, frontage type standards, and thoroughfare guidelines. The purpose of the FBC is to create a compact, transit-oriented development pattern that fosters multi-modal corridors, mixed uses, and a diversity of residential development.

The FBC is a mandatory code that applies to all new development and redevelopment within the boundaries of the Zoning Map or other locations within the municipality where the applicable Context Areas have been applied. For the 28th Street corridor, the boundaries generally include all lands that abut 28th Street from Clyde Park Avenue west to Burlingame Avenue. For the Burton Street corridor, the boundaries generally include all lands that abut Burton Street from Burlingame Avenue to Clyde Park Avenue. Lastly, for the Division Avenue corridor, the boundaries generally include all lands that abut Division Avenue from Alger Street south to 60th Street.

Within the City of Wyoming Zoning Ordinance, properties zoned and thus regulated by the City's FBC are within the FBC districts. This district directs property owners and applicants to this Code for development standards. Wherever there appears to be a conflict between the FBC and other sections of the City's Zoning Ordinance (as applied to particular development within the FBC districts), the requirements specifically set forth in the FBC shall prevail.

Planned Unit Development

The city has also adopted planned urban development (PUD) zoning designations. The intent of these zone districts is to encourage innovative mixed-use developments, protect natural resources, and provide increased opportunities for developments in both infill and greenfield areas of Wyoming.

Zoning and Fair Housing

In and of itself, Wyoming's Zoning Ordinance, including the FBC and PUD, does not present an impediment to fair housing choice. In so far as housing type and location affects cost, and cost serves to limit housing choices to some degree at all but the very highest income levels, the ordinances that regulate housing type and location play a role in limiting housing choice for almost every homeseeker.

These local policies, however, offer the opportunity to increase the supply of housing, and to enhance its affordability in several ways. Revisions to the present Residential Zones to openly allow for the development and use of accessory dwelling units could take advantage of sizable existing residential lots and increase housing opportunity in several areas. By allowing high-density, mixed-use development along established transit corridors, the recent adoption and amendment of FBC not only serves to grow the supply of housing but also takes advantage of proximity to transit services to support an affordable Housing and Transportation Index score, fitting within affordable guidelines for low- to moderate- income households.

Building Code

Wyoming uses the Michigan Building Code 2015 (commercial property) and the Michigan Residential Code 2015.⁴⁵ The Michigan Residential Code provides regulation of construction and related activities but in a clearly stated exception, does not apply to most detached one- and two-family dwellings and townhouses. Section 310 of that code regulates various other residential groups R-1 through R-4, with special conditions for the R-4 group of supervised residential environments with custodial care.

The Michigan Building Code R1 – R4 serves as the Wyoming Occupancy code. It is a widely used standard, establishing minimum requirements for the maintenance of existing buildings through model code regulations that contain clear and specific property maintenance and property improvement provisions. Chapter 4 "Light, Ventilation and Occupancy Limitations" sets forth requirements to establish the minimum environment for occupancy and habitable buildings by establishing the minimum criteria for light and ventilation and identifying occupancy limitations including minimum room width and area, minimum ceiling height and restrictions to prevent overcrowding.⁴⁶

Under Wyoming's applicable International Property Maintenance Code (IPMC), the minimum required floor area in square feet is described for specific rooms, and for numbers of occupants from one to more than six. Minimum bedroom sizes range from 70 square feet for one person up to 200 square feet for four or more occupants. The code goes on to provide minimum floor areas for living and dining rooms, and combined spaces.

The Fair Housing Act specifically allows housing providers to adhere to reasonable local, State, or Federal restrictions regarding the maximum number of occupants permitted to occupy a dwelling (42 U.S.C. 3607(b)(1)). These restrictions often appear in property maintenance codes, and take into account factors such as the number and size of sleeping areas or bedrooms, living rooms, and dining rooms, and/or the overall configuration of the unit.

If a housing provider limits a unit to fewer occupants than would be allowed under the applicable code without just cause, such action could be challenged based on protections prohibiting discrimination against families with children.

⁴⁵ Wyoming MI Code of Ordinances Chapter 10 - Buildings and Building Regulations, Sec. 10-56. - Adoption of Michigan Building Code and Michigan Residential Code.

The city hereby adopts by reference the current Michigan Building Code and Michigan Residential Code promulgated by the State of Michigan under 1972 Public Act 230 and 1999 PA 245. One copy of each code has been and is on file with the city clerk. The code is subject, however, to the following subsections:

(1) (Code 1983, § 11.101; Ord. No. 6-94. § 1, 3-21-94; Ord. No. 32-96, § 1, 1-20-97; Ord. No. 9-03, § 2, 5-19-03; Ord. No. 6-10, § 1, 5-17-10)

State Law reference – Authority to adopt technical code by reference, MCL 117.3(k).

⁴⁶ A Guide for Determining Occupancy Limits based on Local Restrictions; Fair Housing Center of West Michigan 2019

Section 8. Housing Discrimination Complaints

The City of Wyoming has a longstanding contractual relationship with the Fair Housing Center of West Michigan (FHCWM), a private fair housing organization, to receive and investigate complaints of illegal housing discrimination under federal, state, or local laws and ordinances.

Wyoming’s Fair Housing Ordinance demonstrates their strong commitment to *affirmatively further fair housing* in accordance with Community Development Block Grant program requirements; however, the ordinance is not often used. Claimants have the ability to file complaints under state and federal laws that generally offer greater opportunity for investigation and prosecution if warranted, and provide for higher penalties and compensation to individuals who have been discriminated against. The Center has the capacity to investigate complaints, frequently through the use of comparison testing which pairs trained, scripted individuals of differing characteristics in a housing search. FHCWM also assists claimants in pursuing enforcement action that may include compensation and corrective action where claims are upheld.

The Table 8-1 provides the number and basis of fair housing complaints filed during the 5-year period from 2014 to 2018 with the following government or private entities: US Department of Justice (US DOJ), US Department of Housing & Urban Development (US HUD), Michigan Department of Civil Rights (MDCR), the City of Wyoming or its Public Housing Authority, and FHCWM.

Table 8-1. Wyoming Housing Discrimination Complaints, Federal, State, Local, Private, 2014-2018

Basis	US DOJ	US HUD	MDCR	FHCWM	City of Wyoming/PHA
Race		6	4	12	
Family Status		2	1	14	
National Origin		1	3	9	
Disability		1	2	12	
Sex			2		
Age			1		
Income				8	1
Other Basis				5	
Total Complaints		10	13	60	1

Source: US Department of Justice (DOJ), US Department of Housing & Urban Development (HUD), Michigan Department of Civil Rights (MDCR) Fair Housing Center of West Michigan (FHCWM)

U.S. Department of Justice

Complaint records have been requested from the US Department of Justice. The request has been acknowledged but the response is delayed, according to their response letters, due to the government shutdown in December 2018 and January 2019, and a high number of pending requests for information.

U.S. Department of Housing & Urban Development

The US Department of Housing & Urban Development (HUD) provided records of 128 fair housing complaints filed regarding properties in Kent County during the period 2014 to 2018. Complaints alleged discrimination based upon every category including religion. Thirty-one of the complaints were closed by the parties involved and labeled as *Conciliation/Settlement Successful*. The remaining complaints were either withdrawn by the claimant or closed with a finding of *No Cause Determination*.

Ten of those complaints were filed by claimants alleging illegal discrimination at properties located in Wyoming as identified by address or zip codes 49509 and 49519, based upon factors of race, family status, national origin, or disability.

Eight of the Wyoming complaints were closed by HUD with a finding of *No Cause Determination*. One case remains open and under investigation at the time of this report. One complaint based on disability was filed in 2014 by FHCWM, alleging the owner or management's failure to make a reasonable accommodation of a disability. That complaint was resolved in 2015 by the parties involved, with a closure reason stating *Conciliation/Settlement Successful*.

Michigan Department of Civil Rights

The Michigan Department of Civil Rights (MDCR) provided records of 168 fair housing complaints filed regarding properties in Kent County during the 2014 through 2018 period. Thirteen of those complaints concerned properties in Wyoming; seven of those cases were referred to MDCR by HUD and therefore appear in the records of both agencies. MDCR is regarded as “substantially equivalent” by HUD⁴⁷, and is authorized to investigate complaints and administer enforcement to victims and in the public interest.

Four of the 13 MDCR complaints alleging age, national origin, or disability discrimination at Wyoming properties were settled by the parties involved, with a total of \$2,372 in compensation to claimants. The remaining nine complaints were closed by the agency with insufficient evidence of discrimination.

City of Wyoming

A single complaint of housing discrimination based upon the claimant's source of income was handled by the City Attorney, and was resolved to the satisfaction of the claimant.

Fair Housing Center of West Michigan

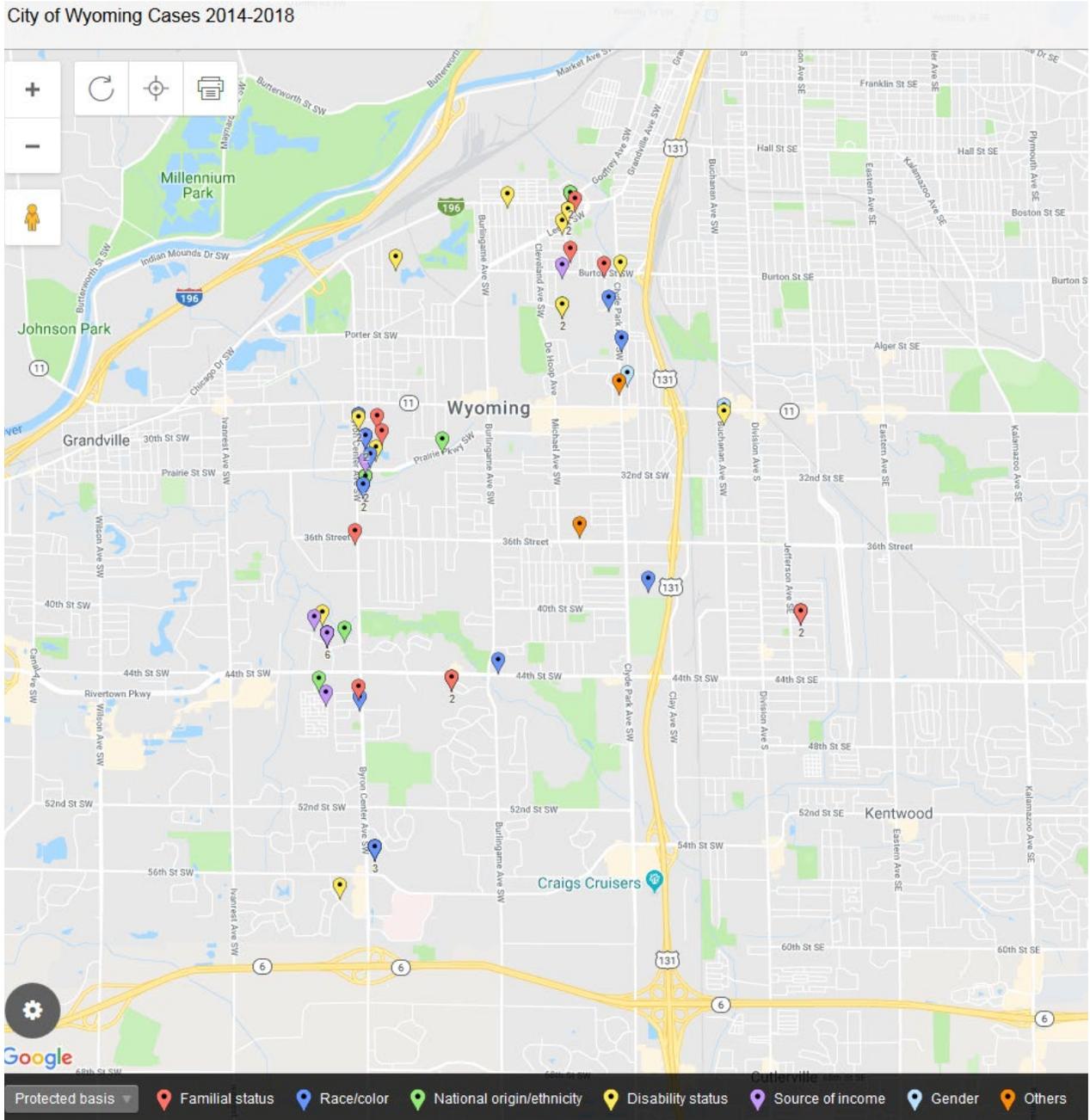
The Fair Housing Center provided records to this study for the 5-year period 2014 through 2018, detailing a total of 60 complaints filed by persons who believed they might have been discriminated against in a housing or related transaction.

The following map illustrates the locations of complaints received by the Center and identifies the basis of the complaint in colors listed at the bottom of the map. Most of the Center's cases involved rental housing, reflected in the somewhat concentrated pattern of complaints toward the North and Central areas of the city.

⁴⁷ A state or local agency may be certified as substantially equivalent after it applies for certification and HUD determines that the agency administers a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. Typically, once certified, HUD will refer complaints of housing discrimination that it receives to the state or local agency for investigation. US Department of Housing & Urban Development (HUD), FHEO Programs and Initiatives

Figure 8-1. Housing Discrimination Complaints: Federal, State, Local, Private 2014-2018

City of Wyoming Cases 2014-2018



Complaints

The largest number of those complaints alleged discrimination on the basis of familial status (14), followed closely by complaints based on race or color (12), or disability (12). Additional complaints alleged discrimination due to national origin, source of income, gender and age.

The type of discrimination most often concerned a rental situation (51 of 60 complaints). Seven of the complaints were related to an alleged failure on the part of the property owner to make a reasonable accommodation of a disability. One complaint alleged harassment, and one alleged discrimination due to race in a mortgage transaction.

Table 8-2. Fair Housing Complaints at Wyoming Properties, Filed with FHCWM, 2014-2018

Protected Basis	FH-Harassment	FH-Mortgage	FH-RA	FH-Rental	Grand Total
Age				1	1
Disability status			7	5	12
Familial status				14	14
Gender				2	2
National origin/ethnicity				9	9
Other	1			1	2
Race/color		1		11	12
Source of income				8	8
Total	1	1	7	51	60

Source: Fair Housing Center of West Michigan

Resolutions

The largest group of complaints were resolved through an administrative closing, indicating that claimants chose not to pursue enforcement or that an investigation could not be effectively completed or did not reveal evidence in support of the complaint. Ten of the complaints were resolved in a positive manner through securing of property or fair housing rights, assistance in a reasonable accommodation, or with a conciliation or settlement through HUD or a different enforcement agency.

Table 8-3. FHCWM Case Resolutions, 2014-2018

Resolution	Age	Disability status	Familial status	Gender	National origin/ ethnicity	Race/ color	Source of income	Total
Conciliated/settled by FHAP					1			1
Conciliated/settled by HUD		1						1
Conciliated/settled by other					1		2	3
Counseled and closed - No fair housing issue		1						1
Directly assisted in RA		3						3
Directly assisted in RA, Client withdrew		2						2
Fair Housing organization administratively closed		1	7	2	3	3	3	19
Fair housing rights secured*			1					1
No Cause Ruling by FHAP		1						1
No Cause Ruling by HUD					1			1
No Further Contact		2	1		1	1		5
No Significant Difference	1							1
No Significant Evidence			3		2	6	1	12
Pending with FHAP						1		1
Property rights secured							1	1
Referred to MDCR		1						3
Total	1	12	12	2	9	11	7	56

Source: Fair Housing Center of West Michigan

Outcomes

The variety of case outcomes reported by the Center is indicative of the unique nature of fair housing complaints received. Grouped under a single set of anti-discrimination laws, the cases themselves vary in numerous ways and that is evident in the wide variety of possible outcomes.

Most notably, complaints were resolved for 39 claimants, while enforcement action led to 523 housing units becoming available as discriminatory practices were corrected. Monetary settlements totaling more than \$3,000 were secured, and housing valued at nearly \$20,000 was obtained or retained for 15 claimants.

In light of the positive outcomes for many of the cases handled by FHCWM, the City may want to consider the benefit of increased education and enforcement-related services to Wyoming residents and homeseekers, with a specific focus on renter households who are at risk of housing instability when they are unable to find or maintain suitable housing. Owners and management professionals may benefit as well in savings of time and monetary damages spent as a result of not knowing or adequately understanding fair housing laws and their application to various situations.

Table 8-4. FHCWM Case Outcomes, 2014-2018

Case Outcomes	Sum of Remedies
Assisted in requesting RA-RM (# people)	6
Closed without resolution	2
Fair housing training	4
Housing obtained (# people)	4
Housing obtained (\$ amount)	\$9,708
Housing retained (# people)	11
Housing retained (\$ amount)	\$9,333
Housing Provider indicates intent to modify practices to comply with FH law	3
Housing Provider made aware of their FH rights and responsibilities	7
Housing Provider modifies practices to comply with FH laws	2
HUD 903 provided	8
HUD-MDCR settlement	2
Monetary settlement to client	\$2,934
Monetary settlement to FHC	\$500
No further contact	5
Other	13
People receive information about fair housing laws or rights	19
Private settlement agreement	2
Property rights secured	4
Reasonable accommodation made	3
Referred to Legal Aid	3
Resolved for number of People	39
Seniors assisted in asserting their fair housing rights	1
Units opened up from housing discrimination	523

Source: Fair Housing Center of West Michigan

Section 9. Private Sector

This section focuses on research regarding private sector activity in Wyoming, including the residential mortgage lending market, the real estate market, the rental market, and other private sector information related to housing.

Rental Housing

As the largest suburb in a growing metropolitan region, Wyoming offers rental opportunities at a variety of prices, locations and types, from single-family homes to small or large rental complexes. According to the most recent data available, 36% of Wyoming renters fall into the two income categories which range from \$25,000 to \$49,999, and two-thirds of them pay from \$500 to \$999 in monthly rental costs in 2017.⁴⁸

More than one in four Wyoming renters (26.6%) with annual household incomes of less than \$20,000 pay more than 30% of their income in monthly rental cost, and an additional one in six (16.6%) in the next highest income category (up to \$35,000) are also at a monthly rental cost level defined as unaffordable. These two categories together combine to a total of more than half of all rental households in Wyoming paying more than the defined affordable rate of 30% of household income for housing.

Less than 20% of renters fall into the higher rental cost categories of more than \$1,500, reflecting the relatively smaller percentage of rental household incomes (a combined 26.8%) above the \$50,000 annual income mark.

Landlord-Tenant Cases

Examination of District Court records for the 2016 and 2017 years describe the volume of landlord-tenant cases handled by courts in Grand Rapids, Kentwood and Wyoming. Although records detailing the actions and any presented reasons for actions are not available for each of these cases, anecdotal information from attorneys⁴⁹ who frequent the 62A Court relate that most cases represent evictions from rental housing by private or corporate landlords.

Table 9-1. Landlord-Tenant Cases by District Court, 2016-2017

Court	2016	2017	% Change
61 st Grand Rapids	4,325	3,919	-9.4%
62A Wyoming	1,661	1,733	+4.3%
62B Kentwood	1,828	1,931	+5.6%

Source: MI State Court, Administrative Office District Court Records

Landlord-tenant filings in District Court 62A are fewer than those of neighboring Kentwood which, despite a smaller population lists more evictions. It is notable, however, that the direction from 2016 to 2017 represents an increase, while evictions in Grand Rapids' 61st District Court have decreased substantially.

⁴⁸US Census Bureau American Community Survey 2017 5-year Estimates

⁴⁹ Five attorney interviews encompassing Legal Aid staff, and private attorneys in consumer and/or criminal practice.

The following information is posted on the City of Wyoming website:

Landlord – Tenant

Landlord/Tenant (Summary Proceedings) are actions to recover possession of premises (eviction) and to obtain certain types of ancillary relief (damages, back rent). They also pertain to land contracts and are used when a party fails to comply with the terms of the contract. Corporations must have an attorney. Individuals have the option of hiring an attorney or representing themselves. Decisions can be appealed to the Circuit Court.

Based on community interviews and the comparison with Grand Rapids court records, Wyoming may want to examine ways in which it might assist its large population of renters in obtaining and maintaining rental housing, particularly through a focus on addressing eviction prevention.

Based on interviews, attorneys on the staff of Legal Aid of West Michigan (LAWM) have extensive experience in Wyoming’s District Court, much of it related to landlord-tenant issues, particularly evictions. A structured interview with several LAWM attorneys revealed that there are currently no eviction prevention or diversion programs in the Wyoming court. They describe evictions as “very quick”, leaving little to no time for any effective defense against the eviction.

Additionally, attorneys noted a general lack of due process for tenants. Lack of enforcement for the requirement that anyone other than the actual property owner must be represented by an attorney was cited as an example.

Although the condition of housing units is frequently offered by tenants as a reason for lack of payment, this is not regarded as a “winnable” issue. With regard to condition, the attorneys were clear in describing that “the City (of Wyoming) has a good inspection program, but the Court will not recognize that as grounds for delay.”

Because tenants are not skilled in legal or court dynamics, they often do not know what to say. The court is required to advise tenants that legal assistance is available from LAWM, but LAWM as well as private practice observers reported in interviews that the advice is often not provided as required. In eviction cases that are undisputed by tenants lacking legal representation, tenants can be evicted in as little as three business days.

The National Law Center on Homelessness & Poverty cites the strong connections between housing instability and homelessness and recommends that legal protections can increase housing stability. Many eviction actions will ultimately be decided in favor of the property owner, but programs designed to offer timely assistance to tenants can over time reduce the number of evictions, prevent the negative effects that pile up on tenants, and improve housing stability for renters and property owners. Human service workers who are in the courtroom can encourage agreement between owners and renters, and by accessing resources available to tenants may be able to pay back rent and prevent a negative credit rating impact. Even for tenants who are required to move, a planned move without trailing credit problems is preferable to the crisis of having to vacate in three days.

Currently, Wyoming CDBG has invested an average of \$15,000 annually to the Salvation Army to support eviction prevention and emergency rental assistance. Wyoming could further benefit many of their renter households with improvements to its court system, and may want to consider encouraging the Michigan Department of Health and Human Services (DHHS) to expand their current funding of Grand Rapids and Kentwood programs and support Wyoming’s implementation of eviction prevention and diversion programs similar to those used in Grand Rapids’ 61st District Court.

Real Estate Sales

Information provided to this study by the Greater Regional Alliance of Realtors (GRAR) details over 1,600 home sales in Wyoming during the period January 2018 through mid-July 2019. Table 9-2 presents property and transaction data regarding those sales, divided into condominium and single-family home sales.

Table 9-2. Property Transactions by Property Type, Size, Price, and Days on Market, Wyoming, 2018-2019

Average of Items	Single-Family Home	Condominium
Number of Properties	1,520	116
Original List Price	\$165,005	\$172,738
List Price	\$162,492	\$171,091
Sold Price	\$165,051	\$169,320
Property Square Feet	1,630	\$1,496
List Price per Square Foot	\$246	\$149
Sold Price per Square Foot	\$219	\$148
Days on the Market	15	42.41

Source: Greater Regional Alliance of Realtors (GRAR), 2019

Records of 1,520 single-family residential properties in Wyoming were analyzed. Sales transactions averaged 15 days on the market over the 18-month period (January 2018 – mid July 2019) detailed here, with the average sales price exceeding the listing price at the time of sale by \$2,559, and even topping the original listing price by a small margin.

The condominium market is somewhat less pressured than that of single-family homes, but still active, recording 116 property sales since January 2018. Prices follow a more traditional pattern than that of single-family homes, as the original list price averages the highest level, followed by the slightly lower list price at the time of sale, and then followed by the sale price which averages approximately \$3,400 less than the original asking price.

Both single-family and condominium properties in Wyoming often move quickly in the regional housing market, aided by a generally modest average price range and proximity to employment, services and amenities. Further address-level study to examine sales by Wyoming area is beyond the scope of this report but would be expected to reveal generally consistent results given previously reported data on population and lending patterns.

Home Mortgage Lending

The 2017 Home Mortgage Disclosure Act (HMDA) data presented in this section comes from the Consumer Finance Protection Bureau (CFPB), the federal agency designated to publish HMDA information on an annual basis at the time of this report.⁵⁰ The 2017 data uses the census tract delineations, population, and housing characteristic data from the 2011–2015 American Community Survey (ACS). In addition, the data reflects MSA definitions released by the Office of Management and Budget in 2015 that became effective for HMDA purposes in 2016.

⁵⁰ The source of HMDA data has changed from CFPB to the Federal Financial Institutions Examination Council, beginning with 2018 HMDA data.

Caution should be used when comparing HMDA data across multiple years for specific geographic areas due to the changes in MSA and census tract boundaries and updates to the population and housing characteristics of census tracts that followed the decennial census and five-year updates based on the ACS data.

HMDA data is the most comprehensive publicly available information on mortgage market activity. Among other uses, the data helps the public assess how financial institutions are serving the housing needs of their local communities and facilitate federal financial regulators' fair lending and consumer compliance examinations.

Since the late 1970's, the federal government has enacted several laws directed toward fair lending practices in banking and financial services. The following selected federal laws apply, and are described in brief:

- The 1968 *Fair Housing Act* prohibits discrimination in housing based upon race, color, religion, and national origin. Later amendments to the Fair Housing Act added the categories of sex, familial status, and disability. It is illegal under the Fair Housing Act to discriminate against any of those protected classes in residential real estate transactions, including loans to buy, build or repair a dwelling; selling, brokering, or appraising residential real estate, selling or renting a dwelling, falsely deny that a property is available for inspection, sale or rental, or setting different conditions, terms or privileges based on membership in a protected class. It is also illegal to advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap;
- The *Equal Credit Opportunity Act*, enacted in 1974, prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, and the exercise of any right under the *Consumer Credit Protection Act*;
- The *Community Reinvestment Act*, passed in 1977, requires federal financial supervisory agencies to encourage financial institutions to help meet the credit needs of the entire community, including low- and moderate-income residents; and
- The *Home Mortgage Disclosure Act* was passed in 1975. HMDA and its later amendments require financial institutions to publicly disclose the race, sex, ethnicity, and household income of those applying for mortgage loans to purchase, refinance or improve residential properties, describing the Census tract and the outcome of the housing-related loan application.

HMDA applies to both depository and non-depository lenders who meet a specific set of criteria outlined in the Act. HMDA data comprises the most reliable information available concerning mortgage lending activity and represents the most comprehensive records regarding housing-related loan applications.

HMDA data alone cannot be used to determine whether a lender is complying with fair lending laws. The data does not include many potential determinants of loan application and pricing decisions, such as the applicant's credit history and debt-to-income ratio, the loan-to-value ratio, and other considerations. Therefore, when regulators conduct fair lending examinations, including ones involving loan pricing, they analyze additional information before reaching a determination about an institution's compliance with fair lending laws.

While there are some disparities in the datasets, particularly as larger areas and therefore larger numbers of records are examined, the differences included here are generally less than significant in the overall consideration of lending activity, and comparisons among areas and years. As the area of focus decreases in size from MSA to Wyoming, records identifying location of properties by census tract, actions taken, and applicant characteristics increase in accuracy and reliability. Close examination of local lending activity yields the most information available as to distinctions according to applicant and geographic areas racial and ethnic characteristics and is therefore most informative to this analysis.

As with population and other demographic and economic information, presentation of HMDA data across a larger geographic and time framework helps to present Wyoming in a regional and historical context.

In examining lending patterns for Wyoming, it is helpful to consider the larger context of the MSA and the county as comparison areas in order to identify signs of racial and or ethnic – primarily Hispanic – discrimination in loan originations and denials. Local measures that present an experiential history that is out of alignment with the surrounding region can indicate lending practices by one or more financial institutions that stand in the way of minority residents and would-be residents purchasing, improving and/or refinancing residential property.

Loan Applications by Purpose

In the specific three years (2011, 2014, 2017) of this study’s focus, banks and other lending institutions serving the Grand Rapids-Wyoming MSA handled over one million residential loans and loan applications. More than 76,000 of those applications came from Kent County, and Wyoming accounted for 8,361 applications, or approximately 11% of the County’s activity.

HMDA records divide loan applications according to purpose: home purchase, refinancing, and home improvement. Table 9-3 shows the 2011, 2014, and 2017 loan applications according to each of those loan purposes.

Table 9-3. Loan Applications by Purpose, Grand Rapids-Wyoming MSA, Kent County, Wyoming, 2011-2014, 2017

Year and Area	Home Purchase	Refinancing	Home Improvement
Grand Rapids-Wyoming MSA			
2011	114,665	206,878	17,909
2014	137,464	138,438	25,569
2017	184,272	150,838	40,652
Kent County			
2011	9,352	17,625	917
2014	11,923	8,691	1,494
2017	14,216	9,263	2,780
Wyoming			
2011	1,092	1,582	91
2014	1,309	924	160
2017	1,758	1,134	311

Source: Consumer Financial Protection Bureau (CFPB) 2011, 2014, 2017 Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Actions Taken

The following “Actions Taken” classifications are identified here, and are most informative in comparing lending markets and favorable versus adverse outcomes, and in examining the possibility of racial and or ethnic discrimination in all types of residential lending:

- Application approved but not accepted (favorable or positive outcome);
- Application denied by financial institution (adverse outcome);
- Application withdrawn by applicant;
- File closed for incompleteness; and
- Loan Originated (favorable or positive outcome).

This report does not include the category of Loans Purchased by Institution, as it can be less informative in racial, ethnic and geographic terms to the analysis of housing choice barriers.

Table 9-4. Action Taken (5 Actions) by Area and Year, Grand Rapids-Wyoming MSA, Kent County, Wyoming, 2011-2014-2017

Year and Area	Approved but Not Accepted	Denied by Financial Institution	Withdrawn by Applicant	Closed for incompleteness	Loan Originated
Grand Rapids-Wyoming MSA					
2011	14,468	69,071	26,872	12,197	195,387
2014	21,406	126,044	29,159	13,251	192,794
2017	24,050	129,946	46,534	20,134	239,996
Kent County					
2011	1,848	8,822	1,994	989	16,153
2014	1,366	7,400	2,189	959	14,908
2017	1,958	6,876	3,065	1,036	18,165
Wyoming					
2011	176	962	185	77	1,520
2014	130	878	220	90	1,567
2017	186	866	377	110	2,136

Source: Consumer Financial Protection Bureau (CFPB) 2011, 2014, 2017 Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Actions Taken as Percent by Category

Tables 9-4 and 9-5 illustrate the relatively consistent rates of actions taken regarding residential lending applications in the five categories noted, using the same information but expressed in Table 9-5 as percentages of each categorical action.

The eight-year period from 2011 through 2017 was a time of significant change in residential real estate markets, beginning in the early stages of recovery from the 2008 Great Recession and moving on to the mostly healthy economic growth period of 2017.

Although variations are evident, the pattern of rates for each action taken resembles each other across the three years examined. This is particularly true of denials and originations in all geographic areas. Denials rise from 2011 to 2014 and then fall to a midway or lower point in 2017, with the most dramatic change observed in the MSA which begins at a lower point than the other areas, rises higher in 2014, and ends at a higher point than either the county or Wyoming.

Loan origination rates also resemble each other across all areas, at their lowest point in 2011 and then rising substantially to 2014 and similar 2017 levels for all. Comparing Wyoming to the rest of Kent County and the MSA in the two key categories of denials and originations, the city experiences loan results in the middle of the other areas. Originations are measured at 66.69% in 2017, between 63.87% for the MSA and 69.18% for Kent County, while denials are tracked at 27.04%, slightly over the county rate of 26.19% and much less than the MSA denial rate of 34.58%.

NOTE: Actions were also evaluated based on the race of the primary applicant for each of the five outcome categories examined. That data is provided in the Appendix.

Table 9-5. Action Taken by Area, Year, and Percentage, Grand Rapids-Wyoming MSA, Kent County, Wyoming, 2011-2014, 2017

Year and Area	Approved but Not Accepted	Denied by Financial Institution	Withdrawn by Applicant	Closed for Incompleteness	Loan Originated
Grand Rapids-Wyoming MSA					
2011	4.3%	20.4%	7.9%	3.6%	57.6%
2014	7.1%	41.8%	9.7%	4.4%	64.0%
2017	6.4%	34.6%	12.4%	5.4%	63.9%
Kent County					
2011	6.6%	31.6%	7.2%	3.6%	57.9%
2014	6.2%	33.5%	9.9%	4.3%	67.4%
2017	7.5%	26.2%	11.7%	4.0%	69.2%
Wyoming					
2011	6.4%	34.8%	6.7%	2.8%	55.0%
2014	5.4%	36.7%	9.2%	3.8%	65.5%
2017	5.8%	27.0%	11.8%	3.4%	66.7%

Source: Consumer Financial Protection Bureau (CFPB) 2011, 2014, 2017 Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Conventional versus Government Loan Disposition

In 2017, the average dollar amount of applications across the MSA was \$153,377. The Kent County portion of the region showed a higher average at \$174,129, and the Wyoming average was significantly lower than either of the larger areas at \$114,170.

The more comprehensive Table 9-6 and additional information contained in Appendix Tables shows aggregate results for 2017 loans, separated by government and conventional categories, providing a comprehensive description of the disposition of all 2017 residential loan applications for the three areas of study in this report. Home purchase loans are divided according to government-sponsored loans (FHA, FSA/RHS and VA), and all applications including purchase, refinancing and home improvement are described by the number and dollar amount of applications for each outcome category.

Looking at the MSA region's 2017 total of 5,585 applications for government-backed residential purchase loans, two-thirds resulted in loan originations and adding loans approved but not accepted increases the rate of positive outcome to 70.4%, with slightly less than 10% of applications denied. Conventional loan applications outnumbered government applications by a factor of more than three to one and resulted in almost 10% more positive outcomes (originations and approved but not accepted), while denials differed by less than a percentage point.

MSA application outcomes are less positive for both refinancing and home improvement applications, with nearly 61% of refinancing and 69% of home improvement loans originated or approved, and 16-19% denied.

Similar to the MSA, Kent County applications show an even higher proportion of conventional versus government applications, and different pattern of outcomes. Applications for government purchase loans were originated or approved at a rate of 77.0%, significantly more than conventional loan applications. Denial rates were also higher, ranging from about 11% to 13%. Refinancing and home improvement loans showed much lower positive outcomes, with only 40% or fewer applications approved or originated, and six to seven percent denial rates.

Within the regional context framed by the MSA and Kent County, the Wyoming housing market fared best with regard to the origination or approval of conventional home purchase loans with over three out of every four applications showing a positive outcome. Corresponding denial rates in both government and conventional types were the lowest of the entire region. Buyers and homeowners in Wyoming depend much more heavily on government-backed mortgages, with FHA and VA accounting for about two-thirds of home purchase applications.

The importance of examining a broad framework of lending patterns lies in the comparison of outcomes from large to small geographies, where dissimilarities become evident in smaller areas and can be further explored to identify the presence or absence of discrimination based on small geography characteristics of race and ethnic origin. Information presented below in Table 9-6 detailing loan applications across the region, the county and Wyoming shows positive and negative outcomes generally within an acceptable range, indicating little to no significant geographic differential in residential lending in 2017.

Table 9-6. Home Purchase Loan Applications by Property Location, Purpose, Type of Loan and Action Taken, 2017

	Government		Conventional	
	Number	\$000's	Number	\$000's
Grand Rapids-Wyoming MSA 46,023 apps \$7,058,898,000*	5,585	\$868,178	19,111	\$3,424,233
Loans Originated	3,794	\$599,270	13,830	\$2,634,046
Apps Approved, Not Accepted	138	\$19,849	726	\$104,149
Apps Denied	530	\$76,324	1,680	\$172,229
Apps Withdrawn	619	\$96,296	1,712	\$320,509
Files Closed For Incompleteness	103	\$15,887	380	\$45,663
Kent County 17,204 apps \$2,995,724,000*	3,471	\$506,693	13,143	\$1,931,451
Loans Originated	2,542	\$387,350	7,629	\$1,421,740
Apps Approved, Not Accepted	129	\$17,843	412	\$70,834
Apps Denied	458	\$67,277	1,418	\$247,670
Apps Withdrawn	436	\$68,200	1,329	\$231,749
Files Closed For Incompleteness	138	\$21,314	398	\$72,141
Wyoming 3,314 apps \$378,361,000*	720	\$93,275	1,095	\$141,977
Loans Originated	483	\$63,999	813	\$112,062
Apps Approved, Not Accepted	20	\$2,530	30	\$3,670
Apps Denied	62	\$7,119	91	\$5,381
Apps Withdrawn	81	\$9,778	99	\$12,752
Files Closed For Incompleteness	16	\$2,321	15	\$1,749

* Area totals exceed sum of actions taken due to loans purchased by institution category not reported

Source: Consumer Financial Protection Bureau (CFPB) 2011, 2014, 2017 Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Loan Disposition by Income and Race and Hispanic Origin

Tables 9-7a through 9-7e provide the most comprehensive look at actions taken on 2017 residential loan applications across the MSA, using divisions of income quintiles, race and Hispanic origin to closely illustrate distinctions based on any or all of those factors among persons of similar household income levels.

NOTES: Per the Census definition, applicants of a particular race (such as White or Black) can also be of Hispanic or Latino ethnicity.

In the lowest income category below 50% of MSA median income, among Black, White, and Hispanic applicants rates of loans originated are within a 4-point range from 49.4% to 53.7%. Joint applications by applicants who identify as different races (White and a Minority Race) have a lower rate of origination, at less than one-third of those applications resulting in a loan origination.

Loan application denials are less uniform among race and ethnic categories. White applicants in the lowest income category were denied less than one-third of the time (30.19%), while Black applicants and those applying jointly were denied 38.7% of the time, representing a 20% difference in denial rate. Joint applicants were denied in almost 44% of their applications.

Comparing White, Black, and Hispanic applicants earning more than 120% of MSA median income, the rate of White application loan originations (81.8%) was more than 10% higher than that of Black applicants (72.0%) and Hispanic applicants (75.4%) of the same income tier. Denial rates displayed the same pattern, with applications by Whites denied at 4.1%, Blacks at 5.3%, and Hispanics at 6.1%. With the information available through HMDA records, the differences noted cannot be accounted for by financial status.

Many factors influence the disposition of loan applications, ranging from property value and appraisal dynamics to applicant situations of debt load, financial history and credit scores. Income levels, however, remain a reliable means of grouping residential loan applications for comparison purposes.

In the middle income category of 80-99% of MSA median income, Black applicants experienced better rates of both originations and denials as compared to White applicants. In all other income categories ranging from less than 50% of MSA median to more than 120%, applications from White persons resulted in a higher percentage of loan originations and fewer denials than Black applicants.

Looking at loan originations, the same is true for Hispanic applicants. Origin rates for White applicants exceeded those of Hispanic applicants in every income category by a margin of 4 percentage points at income levels below 50% of median to 18 points in the middle income category. The middle income category also presented the highest denial rate for Hispanic applicants, over three times higher than that of White applicants.

Notably, this middle category exhibited the best results for Black households and was the only income level where applications by Blacks resulted in more loan originations and fewer denials than those of White applicants. The same racial and ethnic pattern is evident when expanding the analysis to include both loan originations and applications approved but not accepted as positive application outcomes. In the middle income category of 80-99% MSA median income, Black applicants received a combined Origination + Approved rate of 84.21%, exceeding all other race and Hispanic origin classifications.

NOTE: Tables 9-7a through 9-7e have been simplified by removing reference to loan value. Complete information including loan value is provided in the Appendix.

Table 9-7a. MSA Conventional Home Purchase Apps Less Than 50% of Grand Rapids-Wyoming MSA/MD Median Income by Race and Ethnicity (Hispanic or Latino Origin), 2017

	Applications Received	Loans Originated	Apps. Approved but Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for being Incomplete
Race						
American Indian/Alaska Native	8	5	0	2	1	0
Asian	49	28	3	11	4	3
Black Or African American	62	31	2	24	3	2
Native Hawaiian Or Other Pacific Islander	5	1	0	4	0	0
White	1,454	780	80	439	115	40
2 Or More Minority Races	4	2	0	1	1	0
Joint (White/Minority Race)	16	5	0	7	1	3
Race Not Available	156	70	10	45	21	10
Ethnicity						
Hispanic Or Latino	156	77	7	52	17	3
Not Hispanic Or Latino	1,429	782	77	415	114	41
Joint (Hispanic Or Latino/Not Hispanic Or Latino)	5	1	0	3	1	0
Ethnicity Not Available	164	62	11	63	14	14

Source: Consumer Financial Protection Bureau (CFPB) 2017 Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Table 9-7b. Grand Rapids-Wyoming MSA Conventional Home Purchase Apps 50% to 79% of MSA/MD Median Income by Race and Ethnicity (Hispanic or Latino Origin), 2017

	Applications Received	Loans Originated	Apps. Approved but Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for being Incomplete
Race						
American Indian/Alaska Native	15	6	1	3	2	3
Asian	100	68	2	16	13	1
Black Or African American	82	50	6	15	7	4
Native Hawaiian Or Other Pacific Islander	4	4	0	0	0	0
White	3,559	2,615	183	376	280	105
2 Or More Minority Races	3	1	0	2	0	0
Joint (White/Minority Race)	40		4	12	0	2
Race Not Available	373	255	15	47	455	11
Ethnicity						
Hispanic Or Latino	232	145	25	40	14	8
Not Hispanic Or Latino	3,502	2,603	169	371	282	77
Joint (Hispanic Or Latino/Not Hispanic Or Latino)	43	22	3	9	4	5
Ethnicity Not Available	401	252	14	51	48	36

Source: Consumer Financial Protection Bureau (CFPB) 2017 Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Table 9-7c. Grand Rapids-Wyoming MSA Conventional Home Purchase Apps 80%-99% of MSA/MD Median Income by Race and Ethnicity (Hispanic or Latino Origin), 2017

	Applications Received	Loans Originated	Apps. Approved but Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for being Incomplete
Race						
American Indian/Alaska Native	3	2	0	0	0	1
Asian	59	45	1	5	8	0
Black Or African American	38	32	2	2	0	2
Native Hawaiian Or Other Pacific Islander	1	1	0	0	0	0
White	2,024	1,588	81	128	192	35
2 Or More Minority Races	0	0	0	0	0	0
Joint (White/Minority Race)	30	22	1	3	2	2
Race Not Available	277	191	10	32	32	12
Ethnicity						
Hispanic Or Latino	106	64	7	21	11	3
Not Hispanic Or Latino	2,039	1,617	79	117	191	35
Joint (Hispanic Or Latino/Not Hispanic Or Latino)	20	15	1	3	1	0
Ethnicity Not Available	269	186	8	29	31	15

Source: Consumer Financial Protection Bureau (CFPB) 2017 Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Table 9-7d. Grand Rapids-Wyoming MSA Conventional Home Purchase Apps 100% to 120% of MSA/MD Median Income by Race and Ethnicity (Hispanic or Latino Origin), 2017

	Applications Received	Loans Originated	Apps. Approved but Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for being Incomplete
Race						
American Indian/Alaska Native	2	1	0	1	0	0
Asian	31	25	1	3	2	0
Black Or African American	28	17	3	2	4	2
Native Hawaiian Or Other Pacific Islander	2	0	0	1	1	0
White	1,609	1,323	49	70	146	21
2 Or More Minority Races	0	0	0	0	0	0
Joint (White/Minority Race)	29	22	2	3	2	0
Race Not Available	175	133	7	6	25	4
Ethnicity						
Hispanic Or Latino	35	27	4	1	3	0
Not Hispanic Or Latino	1,643	1,349	52	75	149	18
Joint (Hispanic Or Latino/Not Hispanic Or Latino)	23	16	0	2	4	1
Ethnicity Not Available	176	130	6	8	24	8

Source: Consumer Financial Protection Bureau (CFPB) 2017 Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Table 9-7e. Grand Rapids-Wyoming MSA Conventional Home Purchase Apps 120% or More of MSA/MD Median Income by Race and Ethnicity (Hispanic or Latino Origin), 2017

	Applications Received	Loans Originated	Apps. Approved but Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for being Incomplete
Race						
American Indian/Alaska Native	10	4	1	2	3	0
Asian	153	113	2	9	27	2
Black Or African American	75	54	5	4	9	3
Native Hawaiian Or Other Pacific Islander	1	1	0	0	0	0
White	6,560	5,363	222	268	616	91
2 Or More Minority Races	1	1	0	0	0	0
Joint (White/Minority Race)	111	91	0	8	10	2
Race Not Available	842	649	32	44	106	11
Ethnicity						
Hispanic Or Latino	114	86	5	7	12	4
Not Hispanic Or Latino	6,685	5,460	220	273	642	90
Joint (Hispanic Or Latino/Not Hispanic Or Latino)	102	72	6	5	16	3
Ethnicity Not Available	853	658	31	50	101	13

Source: Consumer Financial Protection Bureau (CFPB) 2017 Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Lending by Tract

The following tables provide information to illustrate geographic lending patterns in Wyoming census tracts. A high degree of correlation among the highest minority census tracts and the lowest loan origination rates would be regarded as an indication of discriminatory lending patterns by financial institutions serving the Wyoming market. No such pattern is evident in examining the city's 14 census tracts by minority and MSA median income percentages compared to home purchase loan originations. Loan origination rates range from a low of 66.40% in tract 145.01 to a high of 85% in tract 141.

The highest minority tracts, 133, 142, and 138.02 do not experience the lowest loan origination rates, ranking as seventh, tenth, and thirteenth in loan origination although those three tracts have the highest percentage of minority residents.

One of the three lowest minority population tracts (tract 145.01) experiences the lowest loan origination rate at 66.4% despite its high-income ranking, while the remaining two low minority tracts rank second and eighth in home purchase loan originations.

Notably, origination rates also do not follow a strict pattern of tract income percentages, as four middle-income level tracts see measurably higher origination rates than tracts with higher income levels. Again, tract 145.01 in southern Wyoming is the outlier, with the second highest income and the lowest (least successful) rate of loan originations.

Table 9-8a. 2017 Owner-Occupied Purchase of 1-4 Family Homes by % Minority (Highest to Lowest)

Census Tract	% Minority	% of Median Income	Loan Origination Rate %
133	58.3	58.7	77.8
142	51.2	76.5	69.1
138.02	48.9	59.0	74.6
135	48.8	56.7	71.1
136	40.0	66.3	80.0
143	35.3	76.8	72.3
137	35.0	65.9	79.8
140	33.7	82.8	76.3
138.01	29.9	66.3	78.3
139	24.2	89.1	80.0
141	23.7	82.7	85.0
134	22.9	90.0	76.5
145.02	17.0	120.3	81.0
145.01	13.0	117.2	66.4

Source: ACS 2017 5-Year Estimates; CFPB Home Mortgage Data Loan Application Records (LAR) MSA/MD24340

Table 9-8b. 2017 Owner-Occupied Purchase of 1-4 Family Homes by % of Median Income (Highest to Lowest)

Census Tract	Minority %	% of Median Income	Loan Origination Rate %
145.02	17.0	120.3	81.0
145.01	13.0	117.2	66.4
134	22.9	90.0	76.5
139	24.2	89.1	80.0
140	33.7	82.8	76.3
141	23.7	82.7	85.0
143	35.3	76.8	72.3
142	51.2	76.5	69.1
136	40.0	66.3	80.0
138.01	29.9	66.3	78.3
137	35.0	65.9	79.8
138.02	48.9	59.0	74.6
133	58.3	58.7	77.8
135	48.8	56.7	71.1

Source: ACS 2017 5-Year Estimates; CFPB Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Table 9-8c. 2017 Owner-Occupied Purchase of 1-4 Family Homes by Loan Originations (Highest to Lowest)

Census Tract	Minority %	% of Median Income	Loan Origination Rate %
141	23.7	82.7	85.0
145.02	17.0	120.3	81.0
139	24.2	89.1	80.0
136	40.0	66.3	80.0
137	35.0	65.9	79.8
138.01	29.9	66.3	78.3
133	58.3	58.7	77.8
134	22.9	90.0	76.5
140	33.7	82.8	76.3
138.02	48.9	59.0	74.6
143	35.3	76.8	72.3
135	48.8	56.7	71.1
142	51.2	76.5	69.1
145.01	13.0	117.2	66.4

Source: ACS 2017 5-Year Estimates; CFPB Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Lending by Subarea

Grouping the 2017 lending data by each of Wyoming’s four geographic subareas fails to demonstrate patterns of racial and ethnic discrimination in home mortgage lending. Each area features a range of minority resident and income levels, and a corresponding range of loan origination rates. The Central region, as the city’s largest, shows the smallest variation in successful applications with rates from 74.6% to 80% but substantial differences in its per tract percentages of minority population and median income, indicating that applications are not deemed successful or unsuccessful based on minority status of the applicant.

Based on the most recent HMDA data available, no single census tract or geographic area of Wyoming appears to be impacted by lending barriers reflecting discrimination based on minority status.

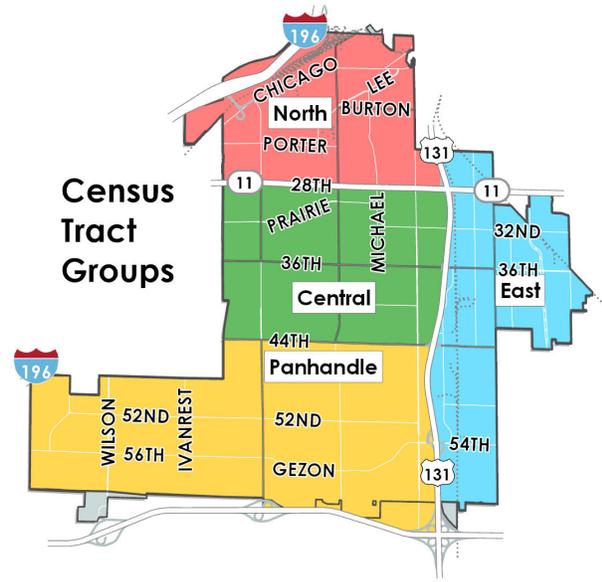


Table 9-9. 2017 Owner-Occupied Purchase of 1-4 Family Homes by Subarea

Subarea	Census Tract	Minority %	% of Median Income	Loan Origination Rate %
North	133	58.3	58.7	77.8
	134	22.9	90.0	76.5
	135	48.8	56.7	71.1
Central	137	35.0	65.9	79.8
	138.01	29.9	66.3	78.3
	138.02	48.9	59.0	74.6
	139	24.2	89.1	80.0
	140	33.7	82.8	76.3
East of US-131	136	40.0	66.3	80.0
	141	23.7	82.7	85.0
	142	51.2	76.5	69.1
Panhandle	143	35.3	76.8	72.3
	145.01	13.0	117.2	66.4
	145.02	17.0	120.3	81.0

Source: ACS 5-Year Estimates; CFPB Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Loan Applications by Race and Ethnicity of Applicant

The following tables present 2017 HMDA data for Wyoming's 14 census tracts, detailing all loan applications for home purchase, refinancing, and home improvement. Information is classified by actions taken on the applications by race of the applicant and by Hispanic origin. In comparing the data available, it is important to note that an additional action taken category, loan purchased by institution, is not included in this particular analysis. The total of that category generally represents less than 5% of all outcomes on total applications and tends to be less informative in examining lending records for patterns of racial and ethnic discrimination. The number of applications, however, is included in the total applications used in calculating loan application outcome rates from the following tables.

The utilization of HMDA data as a tool in examining the impact of race, national origin and geography on residential mortgage lending is somewhat limited by the nature of the records and the degree of accuracy in each category. Large numbers of applications are labeled *information not provided by applicant in mail, Internet or telephone application* and therefore limit the reliability of the data as it describes a housing market.

HMDA data presented in Table 9-10 illustrate the five main actions taken on all 3,314 loan applications submitted in 2017 in Wyoming's 14 census tracts by race of the applicant and Hispanic or non-Hispanic ethnicity of the applicant. Comparing loan application results by race, White applicants experienced higher rates of both loan originations (66.3%) and denials (11.9%) than Black applicants, by margins of less than 10%. The measure of favorable actions demonstrated in combining applications approved but not accepted with loan originations showed a lower margin of difference, with applications submitted by Blacks at a 64.6% positive outcome rate compared to those of White applicants at 68.6%. This is a difference of four percentage points.

Table 9-10. All Purpose Wyoming Applications by Race and Ethnicity of Applicants, 2017

Applicant Race or Ethnicity	Application Approved but Not Accepted		Application Denied by Financial Institution		Application Withdrawn by Applicant		File Closed for Incompleteness		Loan Originated	
	Count	Loan Value (\$000's)	Count	Loan Value (\$000's)	Count	Loan Value (\$000's)	Count	Loan Value (\$000's)	Count	Loan Value (\$000's)
Asian	1	195	8	630	2	203	4	570	43	5,998
Black or African American	6	807	19	1,833	25	3,199	4	571	107	13,910
Information not provided	25	2,002	91	6,952	54	6,131	16	1,851	249	30,910
Native Hawaiian/Pacific Islander			1	98	1	80			3	363
White	60	6,546	310	27,498	289	32,615	85	9,177	1,726	204,297
Total by Race	93	9,656	433	37,185	377	42,869	110	12,282	2,136	256,051
Hispanic or Latino	6	622	77	6,264	51	5,405	20	1,804	261	27,810
Not Hispanic or Latino	62	7,056	273	25,163	275	31,764	77	9,031	1,641	198,974
Total by Hispanic or Latino Origin	93	9,656	433	37,185	377	42,869	110	12,282	2,136	256,051

Source: CFPB Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

In all Wyoming loan applications submitted in 2017, Hispanic applicants fared worse than non-Hispanic applicants in loan originations, denial rates and overall positive outcomes. Applicants identifying themselves as non-Hispanic saw a loan origination rate of 66.6% for all applications submitted, almost 10% higher than that of the Hispanic rate of 60.7%. The corresponding overall positive outcomes differed by an even wider margin, from 69.1% from non-Hispanic applications to 60.7% for Hispanics. Denial rates between the two groups were also much further apart, as Hispanic applicants were denied more than 50% more frequently than non-Hispanics.

Home Purchase Applications by Race and Ethnicity

In 2017, 1,816 home purchase loan applications were submitted on Wyoming properties. Applicants identifying themselves as Black showed a much smaller margin of differential overall from that of White⁵¹ applicants. Loan origination rates differed by just over one percentage point, with Black and White applications successful at virtually the same rates: 71.2% to 72.2%, and denials at a higher rate for Whites at 7.6% than for Black applicants at 5.8%. Comparison of the overall positive outcomes results in nearly identical rates with White applicants experiencing a rate of 74.7%, less than one percentage point higher than Black applicants at 74.0%.

Home purchase applications submitted by applicants of Hispanic origin represented 14% of all Wyoming home purchase applications in 2017 and were overall less successful in all categories examined than those of non-Hispanic applicants. The origination rate of applications by non-Hispanic applicants was nearly 10% higher than that for Hispanic applicants, 73.1% to 66.7%, and the rate of positive outcome was higher at 75.8% and 68.6% respectively. For the purpose of home purchase, Hispanic applicants were denied over twice as often as non-Hispanic applicants, showing a denial rate of nearly one in every seven applications – 14.5% as opposed to 6.2%, or one in every 16 applications, for non-Hispanic applicants.

Hispanic residents are the largest minority population group in Wyoming, representing more than one-fifth of the community. Even accounting for large numbers of applicants whose ethnic or national origin characteristics are not identified, the disparities in loan origination rates and positive outcome rates for all residential loan applications and particularly those for the purpose of purchasing a home are significant, and warrant closer examination to determine the reasons for the differences.

⁵¹ The category of White applicants is a race category rather than an ethnic category, and includes individuals of any ethnicity who identify as White.

Table 9-11. Home Purchase Applications by Race and Ethnicity, 2017

Applicant Race or Ethnicity	Application Approved but Not Accepted		Application Denied by Financial Institution		Application Withdrawn by Applicant		File Closed for Incompleteness		Loan Originated	
	Count	Loan Value (\$000's)	Count	Loan Value (\$000's)	Count	Loan Value (\$000's)	Count	Loan Value (\$000's)	Count	Loan Value (\$000's)
American Indian or Alaska Native	1	106	2	64	2	291			4	295
Asian	1	195	2	287	2	203	3	448	34	5,315
Black or African American	3	441	6	616	10	1,198	1	121	74	10,351
Information not provided	9	1,304	32	2,172	19	2,479	7	964	141	19,637
Native Hawaiian/Pacific Islander			1	98					3	363
White	36	4,154	110	9,263	147	18,359	20	2,537	1,041	140,430
Total by Race	50	6,200	153	12,500	180	22,530	31	4,070	1,297	176,391
Hispanic or Latino	5	562	37	2,805	25	2,859	6	568	170	20,984
Not Hispanic or Latino	36	4,358	85	7,662	139	17,591	19	2,748	999	137,108
Total by Hispanic or Latino Origin	50	6,200	153	12,500	180	22,530	31	4,070	1,297	176,391

Source: CFPB Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Home Purchase Applications by Race and Income

Excerpts from summary tables of HMDA data published by the Consumer Financial Protection Bureau provide a closer comparison of actions taken on 2017 loan applications for the purchase of 1-4 family homes in Wyoming, by assigned income categories and race of applicant and Hispanic origin. Applications without information of applicant race or income have been omitted, as have loans purchased by institutions.

Table 9-12. Home Purchase Applications by Race, 1-4 Family Owner-Occupied Homes by Applicant Income, 2017

Applicant Race	Action Taken	\$1,000- \$35,000	\$36,000- \$50,000	\$51,000- \$75,000	\$76,000- \$100,000	\$101,000- \$500,000
American Indian or Alaska Native	Application approved but not accepted		1			
	Application withdrawn by applicant					1
Asian	Application denied by financial institution	1	1			
	Application approved but not accepted					1
	Application withdrawn by applicant			1		
	File closed for incompleteness	1	1		1	
	Loan originated	8	5	6	4	7
Black or African American	Application denied by financial institution	3	1	2	2	
	File closed for incompleteness			1		
	Application withdrawn by applicant	4	2		1	
	Loan originated	22	17	16	5	5
Native Hawaiian or Other Pacific Islander	Application denied by financial institution	1				
	Loan originated	1	2			
White	Application approved but not accepted	12	12	6	2	1
	Application denied by financial institution	34	21	9	4	1
	Application withdrawn by applicant	46	34	28	9	6
	File closed for incompleteness	2	6	4	1	1
	Loan originated	247	223	239	84	85

Source: CFPB Home Mortgage Data Loan Application Records (LAR) MSA/MD 24340

Home Purchase Applications by Race - \$1,000 to \$35,000 Applicant Income

In the lowest income category of less than \$35,000 in applicant income, 29 Black or African American applicants had higher rates of both originations (75.9% v 72.4%) and denials (10.3% v 10.0%) than White applicants.⁵²

Home Purchase Applications by Race - \$36,000 to \$50,000 Applicant Income

For applicants in the next highest income category of \$36,000 to \$50,000, applications by Black or African Americans were significantly more successful with higher originations and a far lower rate of denial. Seventeen of the 20 applications submitted by Blacks resulted in loan originations, and only a single application was denied. White applications showed a lower rate of originations at 75.3%, and a significantly higher rate of denials at just over 7%.

Home Purchase Applications by Race - \$51,000 to \$75,000 Applicant Income

Black and White applicants with incomes between \$51,000 and \$75,000 experienced similar results in loan originations, with 16 of 19 applications submitted by Black applicants and 239 of 286 applications by White applicants resulting in loan originations, a very slightly higher rate for Black applicants at 84.2% than Whites at 83.6%. Applications by White applicants fared worse in denial rates. No Black applicants were denied, while nine applications, by Whites, or three percent, were denied by the lender.

Home Purchase Applications by Race - \$76,000 to \$100,000 Applicant Income

The number of applications decreases substantially at this and higher income levels. Although the calculation of rates is still useful, it should be used with an understanding of the low raw numbers presented. A total of eight applications by Black applicants fall into the category of \$76,000 to \$99,000 in applicant income levels, with five of those loans resulting in originations for a rate of 62.5%. Combining the originations with applications not approved may increase the usefulness of comparisons in this category, so that combining the two applications that were approved but not accepted with the loans originated yields a positive outcome rate of 88%, slightly exceeded the White origination rate (84%) and the corresponding positive outcome rate of 86%. There were no denials of Black applicants, while four percent of White applicants were turned down by the lender.

Home Purchase Applications by Race - \$101,000 to \$500,000 Applicant Income

Proportionally, the total number of applications by Whites far exceeds those of Black applicants in this highest income level (94 applications compared to five). Each of the five loan applications submitted by Black or African American applicants resulted in a loan origination for a rate of 100%, and no applications were denied. Nine out of 10 of the applications by White applicants were successful, with a single application denied by the lender.

⁵² The category of White applicants is a race category rather than an ethnic category, and includes individuals of any ethnicity who identify as White.

Section 10. History: Prior Analysis of Impediments to Fair Housing Choice

In 2013, Wyoming completed its most recent review of fair housing choice and barriers affecting resident and would be residents' housing decisions. The data used in that study was generally from the 2010 US Census, with some items of information from 2012 at the most recent.

At that time, Wyoming was recovering from the economic downturn beginning in 2008 along with the rest of Michigan and the nation. The west Michigan region, particularly Kent County, has generally fared better than Michigan as a whole, with the Grand Rapids-Wyoming MSA among the leading economic growth areas across the state.

The 2013 analysis followed the same format as the current study, using the methodology suggested by US Department of Housing & Urban Development guidelines. Changes to those guidelines have been made and rescinded in the ensuing years by various administrations, leaving entitlement communities with the framework that includes population and demographic data, and review of policies, practices and housing dynamics that affect the city of Wyoming.

Several impediments and opportunities were identified, along with suggested actions for the future. Topics regarding transportation and employment connections, education, financial services, development and incentives, civic representation, subsidized housing, laws and ordinances, land use and zoning, and infrastructure were all addressed.

The following presents the 2013 suggested actions and evident follow up activity in brief form, to be expanded in this study's current Impediments and Opportunities Section.

Table 10-1. Summary of 2013 AI Suggested Actions

Topic	2013 Suggested Actions	Status
Transportation & Employment	Work with The Rapid to review transit routes on an annual basis, and ensure that new developments are adequately served by regular transit service.	Ongoing
	Ensure that Wyoming's Complete Streets Plan includes all segments of the city, all thoroughfares, and all types of users.	Ongoing
	Repair and maintain existing sidewalks.	Dedicated sidewalk millage supports a high quality sidewalk network with ongoing work to increase bike lanes and connect trails and routes to jobs, services, recreation centers and public amenities
	Require that pedestrian and bicycle transportation routes are installed within new commercial, residential, and mixed use developments, and ensure that non-motorized transportation routes connect to existing and/or planned employment centers and public amenities.	Adoption of Planned Unit Development 4 (PUD-4) Ordinance encourages development that includes a mix of housing types.

Topic	2013 Suggested Actions	Status
Transportation & Employment	<p>Encourage the redevelopment of key sites along 28th Street that would be conducive to mixed use development, especially to provide mixed income housing units in (the appropriate styles).</p> <p>Target redevelopment and the creation of dense, mixed income housing options along the Silver Line corridor, especially near stations.</p>	<p><i>Adoption of Form Based Code has contributed to mixed-use development in three key areas of Wyoming</i></p> <p><i>Participation in the 2019 FTA grant-supported Silver Line analysis and planning to focus on density and transit-oriented development opportunities</i></p>
Education	<p>Build relationships with non-profits and philanthropic organizations to provide additional opportunities for scholarships and other tuition assistance for graduates of the school districts that serve Wyoming.</p> <p>Work with the city's school districts, Grand Rapids Community College, and the Kent Intermediate School District to increase linkages between high school and college so that interested high school students can begin attending college while still in high school, allowing high school students to graduate with an associate's degree.</p> <p>Support Head Start and other pre-school programs with City resources, especially the use of City-owned recreational and activity space.</p>	<p><i>7 public school districts and several private options create a range of choices in schools and related neighborhoods</i></p> <p><i>Participation in TEAM 21 with three districts: Wyoming Public, Godwin, Godfrey-Lee to serve 2,000 students through 21st Century Learning Centers.</i></p> <p><i>Support is ongoing through use of space and recreation resources</i></p>
Financial Services	<p>The City should work with social service agencies, MSU Extension, local school districts, secondary education providers and lending institutions to encourage their work with families who seek to better their housing situation by offering free or reduced-cost financial literacy tools and estate planning.</p> <p>Work with social service agencies and lending institutions to create a "home network" to act as a local clearinghouse for all housing programs (rental, owner and senior housing) so that housing seekers are matched with the best option for their needs and desires.</p>	<p><i>Participation in and reliance upon the existing regional network of housing and social service agencies to refer families to agency resources for financial literacy assistance, estate planning and housing support.</i></p> <p><i>Participation in and reliance upon the existing regional network of housing providers and developers to advise homeseekers about housing and related options according to needs and desires</i></p>

Topic	2013 Suggested Actions	Status
Development Incentives	<p>Develop local incentive programs for infill and mixed-income housing.</p> <p>Conduct a study of vacant property to market sites within the City, promoting sites that are vacant and are ripe for redevelopment, especially crucial sites like Klingman's, Studio 28, and the General Motors site.</p> <p>Create a program to assist with the demolition of obsolete buildings in exchange for the redevelopment of the site.</p> <p>Incentivize multifamily redevelopment sites, including renter and owner housing options within walking distance of existing commercial and employment centers,... especially the Galewood neighborhood as well as the 28th Street and Division Avenue corridors.</p>	<p><i>Financial development incentives are difficult due to local tax structure based on property taxes and fees.</i></p> <p><i>Under-utilized as well as vacant sites are tracked, with a focus toward redevelopment as opportunities are realized at these sites.</i></p> <p><i>Demolition program is supported through brownfield and CDBG resources.</i></p> <p><i>Adoption of Form Based Code creates incentives in density, parking and dimension standards in the Burton (Galewood), Division Avenue and 28th Street corridors.</i></p> <p><i>Adoption of Planned Unit Development 4 (PUD-4) Ordinance encourages development that includes a mix of housing types.</i></p>
Civic Representation	<p>As terms expire, City Council should want to ensure that the selection of Board/Commission members is more balanced by gender, race, ethnicity, and geography so that different aspects of the community are represented.</p>	<p><i>Continued interest toward tracking demographic and geographic characteristics is key to highlighting the diversity of the Wyoming community.</i></p>
Subsidized Housing	<p>Assist and support non-profit and community groups in their efforts to assist low-income families in finding quality, affordable housing, and also in their efforts to provide cost of living assistance.</p> <p>Ensure that information on the resources available to help residents with the costs of housing is available, including using TV, radio, internet, and social media to addition to more traditional forms of outreach.</p> <p>Proactively assist homeowners in using the Community Foreclosure Response Toolkit.</p> <p>Leverage the resulting development pressure to incentivize mixed-income, transit-oriented developments with dense housing typologies that allow a wide variety of community members' access to the new transportation opportunities.</p> <p>Continue to support home renovation assistance programs for homeowners.</p>	<p><i>Participation in and reliance upon existing housing and human service supports are funded annually by the City of Wyoming for this purpose.</i></p> <p><i>Information is available through the City, Wyoming District Library, and Wyoming Senior Center as well as various media and updated as required.</i></p> <p><i>Toolkit became outdated with the end of the foreclosure crisis</i></p> <p><i>Use of Form Based Code provides incentives for mixed-income, transit-oriented development through density, parking, and bulk standards incentives in 28th, Division and Burton St corridors.</i></p> <p>Ongoing</p>

Topic	2013 Suggested Actions	Status
Laws & Ordinances	<p>Consider amending the City of Wyoming Fair Housing Ordinance to prohibit discrimination on the basis of sexual orientation and gender identity.</p> <p>Consider encouraging landlords of residential rental properties to receive fair housing training or require them to self-train on fair housing laws and regulations, and submit proof to the City. Such training is offered by the Fair Housing Center of West Michigan in conjunction with the City of Wyoming.</p> <p>Increase code enforcement of trouble properties, regardless of ownership status or vacancy status. Create a fund specifically for maintaining vacant and unsecured lots.</p>	<p><i>Consideration of an ordinance change by the City Council is an ongoing process.</i></p> <p><i>Wyoming supports the Fair Housing Center of West Michigan with annual financial resources, and encourages property professionals to avail themselves of training and education programs offered.</i></p> <p><i>Code enforcement is ongoing, with an emphasis on vacant and unsecured properties to maintain neighborhood and commercial area quality.</i></p>
Land Use & Zoning	<p>Provide information and resources to help developers make use of existing state and federal incentives for infill development and mixed-income housing.</p> <p>Streamline processes and procedures, where applicable, to ensure that zoning and building regulations are not an impediment to redevelopment.</p> <p>Require new housing developments to set aside a certain percentage of housing units for low-to-moderate income households.</p> <p>Consider promoting the development of accessory dwelling units as a means to provide increased housing options.</p> <p>Create a mixed-density residential zoning district adjacent to the city's commercial and planned commercial areas.</p> <p>Allow higher density development along Division Avenue as a means to capitalize on Bus Rapid Transit.</p> <p>Implement zoning incentives, such as density bonuses or relaxed dimension standards, for mixed-income housing and/or community amenities.</p> <p>The City should consider that status of congregate living facilities for parolees and allow such facilities to be permitted in other zoning districts. Housing for parolees should be held to the same standard as other congregate living facilities.</p>	<p><i>Staff is knowledgeable concerning existing state and federal incentives for infill and mixed-income housing development.</i></p> <p><i>Adoption of Form Based Code and PUD-4 Ordinance has served to decrease barriers to redevelopment. Set-aside regulations require not only local political will and acceptance, but legislative changes at the state level.</i></p> <p><i>Accessory dwelling units are only allowed in Form Based Code districts by current zoning and land use codes.</i></p> <p><i>Wyoming's Form Based Code and PUD-4 encourages mixed-density development adjacent to commercial and planned commercial areas.</i></p> <p><i>Higher density development is encouraged along the Division Avenue corridor served by the Silver Line Bus Rapids Transit.</i></p> <p><i>These incentives are accomplished through Form Based Code and PUD-4 Ordinance</i></p> <p><i>No changes have been made affecting the status of congregate living facilities for parolees, which are currently permitted in an I-2: General Industrial District subject to the approval of the Planning Commission</i></p>
Infrastructure	<p>Incentivize or require on-site stormwater improvements to reduce strain on the stormwater system.</p> <p>Prioritize the upgrading of sewer, water, and stormwater infrastructure in areas of Wyoming that are planned to receive infill development and density increases.</p>	<p><i>Ongoing</i></p> <p><i>Current planning provides a 20-year consideration of future infill development and density increases.</i></p>

Section II. Impediments & Opportunities

Fair housing is not just an important tool for eliminating discrimination; it also helps to strengthen families, communities, businesses, and our overall economy. Fulfillment of the letter and spirit of the law means that every community can be a place of opportunity where people can live in diverse, inclusive, accessible neighborhoods with quality schools, healthy foods, meaningful jobs, health care, green spaces, quality credit, and the other opportunities that frame and affect our lives.

(Source: National Fair Housing Alliance)

The Fair Housing Act is often understood as a straightforward prohibition against discrimination toward individuals on the basis of race, religion, sex, national origin, or other personal characteristics. In fact, the Act goes far beyond that directive to require HUD and those jurisdictions connected through HUD resources to examine their communities, identify the local dynamics of housing opportunity, and confront the structural impediments to fair housing choice.

Few if any of the dynamics at work present a clear barrier to housing. The days of stated separation due to race or ethnicity or age and the like are behind us, and the laws and policies and practices that govern communities are facially neutral in their intent. The ways in which they are applied, however, can have a disparate impact on particular segments of the population and must be addressed, either through the traditional means of enforcement and education or by a careful look at the cause and effect factors involved.

Housing choice is strongly influenced by indirect forces. The identification of impediments is an early step in the complicated process of changing those dynamics that limit housing choice, and moving as a community toward the desired reality of affirmatively furthering fair housing.

This AI broadly analyzes actions and conditions that may have the effect of limiting housing choice, and makes recommendations to overcome the barriers identified. Ideally, the AI will provide essential information to officials, residents and other stakeholders, and serve as a basis for planning and the development of clear action steps to broaden fair housing choice.

Findings

- Wyoming's young and diverse population, large industrial tax base, and convenient access to major employment, services, and transportation provide a platform to maintain and enhance the social and economic quality of life currently valued by its residents.
- The Steering Committee identified accessible and affordable housing stock as their top priority.
- Community engagement revealed a strong desire that the City's Boards and Commissions represent Wyoming's diversity.
- Despite its consistently high employment rate, Wyoming's 2017 median income of \$50,971 is significantly less than either Kent County or the surrounding MSA region.
- Nearly 14% of Wyoming residents live with a disability, and those over 65 years of age account for almost 35% of its population.
- According to the Center for Neighborhood Technology, Wyoming has a H+T Affordability Index score of 46 (out of 100). This reflects a combination of overall housing costs (22 for a typical household), and transportation costs in the same range at 24. The H+T Affordability Index (which is discussed in Section 2) offers an expanded view of affordability at local levels, one that combines housing and transportation costs and sets the benchmark at no more than 45% of household income.

- Wyoming renters represent a third of its population, and about half of them are cost-burdened by housing costs that consume more than 30%, or often even more than 35%, of their total monthly household income.
- The Wyoming Housing Commission does not maintain the necessary data concerning household and neighborhood race, ethnicity, income and location to carry out a key part of its strategy to address housing needs, counseling Section 8 residents as to locations of units outside of areas of poverty or minority concentration and assist them in locating those units.
- The majority of fair housing complaints to federal and state enforcement agencies as well as the Fair Housing Center of West Michigan allege unlawful discrimination in rental housing related to disabilities;
- Over 800 homeless people – individuals, families with children, and unaccompanied youth – were a part of the Wyoming community in 2018.
- In all Wyoming loan applications submitted in 2017, Hispanic applicants fared worse than non-Hispanic applicants with fewer loan originations, higher denial rates, and a lower rate of positive outcomes overall. Differences between Black and White applicants (which racial categories that include persons of Hispanic or Latino ethnicity) were modest, and did not consistently favor any racial group.

Impediments

In the context of an AI, an impediment to fair housing can be an action or a lack of action that restricts housing choice, or that has the effect of restricting housing choice. This study has identified the impediments as follows.

- The high cost of rental housing and extreme burden those costs place on tenants present a barrier to fair housing choice. While housing costs for homeowners have decreased slightly since 2014, the increase in cost burden for renters is significant and indicates a need to focus specifically on actions that can be taken to assist renter households.
- Negative perceptions toward the term “affordable housing” exist and can undermine public support of housing development and interfere with efforts to increase housing options aligned with household incomes and affordability.
- The Wyoming Housing Commission’s lack of contemporary information about local concentrations of poverty and minority residents prevents the Commission from carrying out its strategy of assisting residents in effective housing searches and may inadvertently exacerbate the growth or persistence of those housing patterns.
- Successful fair housing complaint outcomes, particularly concerning reasonable accommodations for persons with disabilities, may indicate a lack of awareness regarding fair housing issues and compliance that acts as an impediment to housing choice for those with disabilities.
- Geographic boundaries applied to fair housing services due to HUD grant-related requirements and local financial support may limit anti-discrimination enforcement options for residents and would-be residents.
- Unfavorable outcomes in loan originations and denials for loan applications from Hispanic applicants presents an impediment to homeownership for Wyoming’s largest minority population, whether residents or would-be residents.
- Homelessness affecting Wyoming residents indicates the existence of short-term or chronic impediments to housing choice, and an inability to resolve housing issues for oneself or one’s household due to limitations of capacity or circumstances.
- The lack of information regarding racial, ethnic and geographic characteristics of Boards, Commissions and Committees charged with leadership responsibilities is a barrier to ensuring that the diversity of the Wyoming community is represented at desired levels.

Recommendations

HUD rules specifically addressing the requirement to affirmatively further fair housing were adopted in 2015 and suspended in 2018. Although the proposed AFFH report is not currently required for entitlement jurisdictions, the longstanding legal requirement for each community to certify their commitment to further the purpose of the Fair Housing Act remains in force. In a practical sense, this translates to taking meaningful actions to address significant disparities in housing needs and access to opportunity.

Affirmatively furthering fair housing is defined by HUD regulations as:

- Having an AI to fair housing choice;
- Taking appropriate actions to overcome the effects of impediments; and
- Keeping records reflecting the analysis and showing actions taken.

The recommendations made by this study for future actions are based on its findings, and are suggested to address impediments related to those findings that have been identified in the process.

Recommendation #1: Data

Establish Information and data protocols for the City of Wyoming, and the Wyoming Housing Commission to support fair housing goals and strategies.

Two key AI findings relate to the collection and retention of demographic and geographic information by the City of Wyoming and by the Wyoming Housing Commission.

With respect to the City, community engagement revealed a strong desire that the City's Boards and Commissions represent Wyoming's diversity. By collecting demographic data of those in positions of community leadership and adding it to the address information currently provided, the City can assess the representation of various groups and provide information to the public that demonstrates diverse community leadership.

By formalizing protocols governing data and information collection, use, and retention, Wyoming can demonstrate its actions toward reflecting the diversity of their community in the leadership of its Boards, Commissions, and Committees as they carry out advice and decision-making responsibilities. Collection of demographic and geographic information on all forms of volunteer applications can provide the personal information necessary for the City to ensure the diverse make-up of these bodies.

Regarding the Wyoming Housing Commission, the level of data presently collected and analyzed is less than required to support its housing needs strategy. The collection and analysis of contemporary geographic and demographic data can strengthen the Commission's strategy of assisting residents in their housing search.

The Wyoming Housing Commission already has demographic information regarding its participants. By matching that data with participant addresses and maintaining current information about neighborhood and census tract populations, the Commission can more accurately focus their housing search assistance to participants to align with WHC strategy and ensure that they avoid contributing to poverty and minority concentrations.

Additionally, concerning the City's commitment to affirmatively furthering fair housing, the HUD Planning Guide strongly suggests appropriate actions and a record-keeping framework to support their AFFH certification, including the following:

- Prioritized list of actions to overcome the effects of identified impediments with milestones, timetables, and measurable results;
- AI-related actions undertaken;
- Transcripts of public hearings and citizen comments and input;
- Progress reports, which should be kept available for public review;
- Description of the nature and extent of the governing body's commitment to fair housing planning;
- Description of the financial and in-kind support for fair housing planning, such as funds or services provided by the jurisdiction, non-profit organizations, private individuals, colleges, universities, contractors and staff supports; and
- List of groups participating in fair housing planning.

Regarding their AFFH obligations, HUD's strong suggestions provide Wyoming a clear format for certification-related record keeping, and should be adopted as quickly as possible to facilitate the periodic evaluation of actions taken to address housing choice impediments.

Recommendation #2: Development

Work with private and community-based entities to align interests and facilitate contemporary housing and mixed-use development in those areas most appropriate for affordability.

Several of the most important findings from this study are related to housing cost and housing development, specifically identifying accessible and affordable housing as a top priority, calling for an increase in Wyoming's affordable housing supply, citing monthly housing cost burdens, and noting community perceptions about affordable housing.

Wyoming has the advantages of available space, transit access, and an appropriate zoning code as it looks toward its future and the critical role of housing supply to its overall health in the coming years.

Pursuit of transit-oriented development opportunities through municipal strategies that align the planning process with developer and community interests can increase location-efficient, affordable housing options. Mixed-use development, especially along major transportation systems, will increase supply while recognizing the city's modest median income levels and promote affordability through the density and location efficiency standards allowed under its Form Based Code.

New construction and redevelopment of existing properties should be undertaken as quickly and effectively as possible along the 28th Street SW and Division Avenue corridors, and in the sizable areas available for redevelopment. It is important that development be carried out in compliance with accessibility standards to meet significant disability and senior populations needs, and with continuing attention to the importance of positive perceptions by the surrounding community.

Recommendation #3: Renter Households

Support services that focus on Wyoming’s rental population to increase access to and maintenance of safe housing as a means of promoting stability and high quality of life.

According to the information available to this study, recent increases in housing cost have fallen most heavily on renter households. Given the high number of households that are cost-burdened under the contemporary definition of spending more than 30% of income on housing, this study recommends the City continue to target services and resources to those most in need to enhance household stability and increase the related quality of life for individuals and families. Issues of poverty can disproportionately affect those in protected classes, and are therefore a critical element of fair housing choice.

Additional changes that impact renter households should be explored, especially those that have the potential to improve Wyoming District Court functions and minimize the negative impact of evictions on tenants and their credit. Eviction diversion and prevention programs have been successful in other jurisdictions, and can be used as a model for programs to provide a substantial benefit to Wyoming’s high number of renter households.

Recommendation #4: Homelessness

Develop a community-driven framework to guide local actions of City officials, agencies, law enforcement and community groups to address homelessness.

Wyoming is not immune to the homelessness issues frequently regarded as urban situations. A significant number of Wyoming individuals, families, and students lack adequate housing, and present the need for the City to address housing types and incentives to expand housing opportunities for low income households. Continued active participation in the county-wide Continuum of Care is essential, and should be accompanied by the community-driven development of local information and protocols to guide practical, specific actions to support and assist persons and families who are homeless or at imminent risk of becoming homeless.

Such a framework will ideally involve residents, businesses, employers, schools, churches, law enforcement and other community sectors in understanding who is homeless in Wyoming, identifying policies and/or actions to assist in housing those who are in need, and clarifying the roles of key partners in government and law enforcement, housing and human service agencies, and various other community sectors related to homelessness.

Recommendation #5: Fair Housing Complaints

Continue to work to ensure support of fair housing services to the entire Wyoming community.

Enforcement of federal, state and local laws against housing discrimination is most often based on private actions by individuals or organizations that suspect discriminatory situations and file complaints with a government or private agency. Complaints filed with the Fair Housing Center of West Michigan are more likely to feature a positive outcome for the claimant than those pursued without assistance as they can be investigated, often with highly controlled paired testing to gather evidence, and in many cases resolved through education, conciliation or settlement agreements along with securing property and fair housing rights.

Further, with regard to persons with disabilities, the Center’s success in helping claimants obtain legally-required reasonable accommodations of disabilities points to the potential impact of additional education to prevent discriminatory situations and facilitate housing searches for those who live with their own or a family member’s disability.

Notwithstanding the federal regulations regarding CDBG expenditures, Wyoming is urged to consider ways to expand fair housing services throughout the city, making education and enforcement activities available to residents and prospective residents without regard to the limits of low- and moderate-income geographies currently in force. Limitations on enforcement and education

activities based on census tract income levels may not be effective in addressing those structural barriers to housing opportunity that are not confined by economic status.

Expanding City sponsored educational activities, coupled with leveraging and investing additional resources as they become available with area non-profit organizations and housing system advocates, including housing providers, rental property management associations, and the Fair Housing Center, can be combined to greater effect.

Recommendation #6: Residential Lending

Analyze current individual Home Mortgage Disclosure Act (HMDA) records to inform the understanding of lending patterns and engage area lending institutions in a partnership to formulate steps to eliminate racial or national origin disparities.

This study's examination of Home Mortgage Disclosure Act (HMDA) data included records detailing loan applications from 2011, 2014, and 2017, and compared records across the MSA region, Kent County, and Wyoming. Focusing on residential lending activity in the 14 census tracts that make up Wyoming, there were measurable disparities in the outcome of loan applications submitted by Hispanic applicants as compared to non-Hispanic applicants, favoring non-Hispanic applicants.

Applicable HMDA records do not contain sufficient information as to reasons for the denial of applications by any/either group to support specific conclusions for the disparity, but warrant closer examination as to the circumstances of each application including applicant income, loan amounts applied for, co-applicants and characteristics, property locations along with stated denial reasons. In light of Wyoming's large and growing Hispanic population, the availability of credit for the purchase, refinancing or improvement of homes is critical to the economic health of the Hispanic population and the surrounding community.

These recommendations, along with the AI's findings and identified impediments, are intended to provide a starting point for civic planning and action, and are especially timely considering the current development of *Wyoming [re]Imagined*, a Master Plan to frame the future of Wyoming.

As the environment shifts over time and the circumstances influencing housing choice change in scope and direction, new information should be incorporated into both the planned action steps and the periodic evaluation of those activities to gauge their effectiveness in affirmatively further fair housing.

Section 12. Housing Needs Assessment

The Housing Needs Assessment identifies demand for housing within the City based on the composition of the existing housing stock, the characteristics of the current household population, and the local share of regional household growth projected to occur within Wyoming. Potential opportunities to accommodate projected future growth are identified based on observed housing trends within Wyoming and broader shifts in housing demand occurring at the national level by housing tenure and type. Similar to the Analysis of Impediments to Fair Housing (AI) presented in the preceding sections of this report, housing data was collected at the census tract level and aggregated to summarize housing needs by subarea (North, East of US-131, Central, and Panhandle).

Methodology

In determining Wyoming’s future housing needs, several important factors have been taken into consideration including: existing housing supply, units planned and under construction, projected population and household growth, average household size, housing tenure, and household incomes (current and projected). The following discussion provides an overview of the methodology used in calculating future housing needs and summarizes key takeaways from the detailed analysis and data presented in this section.

Assess Existing Housing Stock

Key aspects of the existing housing stock have been summarized by subarea, including household type (e.g. single-family, multifamily, etc.), tenure (i.e. owner-occupied vs renter), vacancy, and cost (i.e. home value and gross rent). Affordability within the existing housing stock was also assessed by grouping existing housing by home value and rent and then comparing unit availability to the number of households within related income ranges. Data regarding Wyoming’s existing housing stock comes from the U.S. Census American Community Survey (ACS) 2013-2017 5-year estimates, the most recent year for which data was available at the time of analysis.

NOTE: The total unit count reported for the City of Wyoming for the Housing Needs Assessment is 27,940 (18,275 owner-occupied, 9,665 renter-occupied) and is derived from summing unit counts from all tracts. This differs from the 27,915 reported for the AI sections of this report (18,250 owner-occupied, 9,665 renter-occupied). Data has been collected at the tract level and the discrepancy of 25 units when summing all tracts relates to ACS margin of error associated with collecting data at this finer level of geography.

Table 12-1. Existing Units

Subarea	Total Units	Occupied		Vacant (Available for Occupancy)	
		Owner-Occupied	Renter-Occupied	Owner-Occupied	Renter-Occupied
North Total	5,488	3,522	64.2%	1,966	35.8%
Central Total	11,784	6,885	58.4%	4,899	41.6%
East Total	3,875	2,775	71.6%	1,100	28.4%
Panhandle Total	6,793	5,093	75.0%	1,700	25.0%
Total	27,940	18,275	65.4%	9,665	34.6%

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

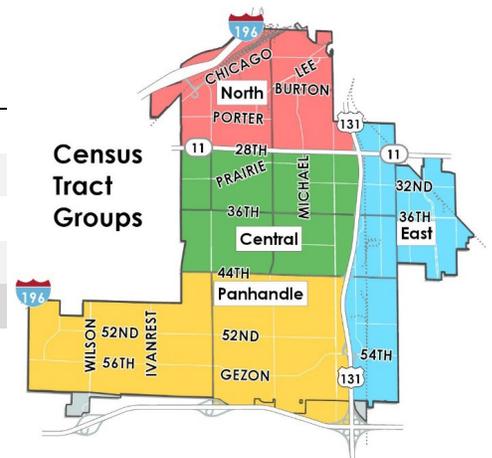


Table 12-2. Owner & Renter Affordability Comparison by Income Range

Area Median Income	< 30%		30-50%		50-80%		80-100%		> 100%	
Income Range	<\$20K		\$20K-34,999		\$35K-49,999		\$50K-74,999		\$75K+	
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	Own	Rent
North Surplus/Deficit	553	-35	654	-18	660	141	-972	-61	-895	-27
Central Surplus/Deficit	246	-733	1,318	1,508	1,976	204	-1,365	-662	-2,175	-317
East Surplus/Deficit	468	-31	954	154	-43	183	-811	-224	-568	-82
Panhandle Surplus/Deficit	156	-204	-267	534	358	307	383	-273	-630	-364
Total Surplus/Deficit	1,423	-1,003	2,659	2,178	2,951	835	-2,765	-1,220	-4,268	-790

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Future Population and Households

Projected household growth was used to identify how many housing units the City of Wyoming has the potential to accommodate over the next 25 years. The Grand Valley Metropolitan Council (GVMC) is the council of governments for the Grand Rapids-Wyoming MSA and prepares population and household projections for the region. The GVMC projects Wyoming will gain 8,854 new households from 2017 to 2045.

Table 12-3. Household Projections

	2017	2045	Change
Households	27,940	36,794	8,854

Source: Grand Valley Metropolitan Council; Houseal Lavigne Associates

Future Household Size – Owner and Renter

Changes in household size (number of persons per household) among Wyoming’s owner- and renter-occupied housing units were documented between 2010 and 2017 to identify anticipated growth rates by housing type. Using historical trend data and incorporating a recent national trend towards an increase in renter households, the 8,854 new households were allocated by household size. This calculation assumes one person per bedroom (e.g. a household living in a two-bedroom unit only has two people). It also separates future potential households by tenure, identifying need by owner and renter.

Table 12-4. Owner & Renter Future Household Size

Total	1-person household		2-person household		3-person household		4-person household		5-person household		
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	Own	Rent	
North Surplus/Deficit	1,743	237	235	361	158	133	130	141	63	169	115
Central Surplus/Deficit	3,764	414	725	801	435	431	252	250	143	169	145
East Surplus/Deficit	1,213	204	59	214	119	150	56	163	84	87	76
Panhandle Surplus/Deficit	2,134	172	242	607	227	359	76	172	36	212	33
Total Surplus/Deficit	8,854	1,027	1,261	1,983	939	1,073	514	726	326	637	369

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Future Household Income

In addition to household size and tenure, projected future households were also allocated by income range. Changes in household income for owner- and renter-occupied housing units were documented to identify the anticipated makeup of the future household population by income. The Compound Annual Growth Rate (CAGR), the constant rate of change of households over a specified time period, for each household income range was calculated from 2010 to 2017 for each census tract and used in these estimates.

Table 12-5. Future Households by Income Range by Tenure

Income Range	Total	Owner	Renter
<\$20K	1,512	477	1,035
\$20K-24,999	392	178	214
\$25K-34,999	1,151	548	603
\$35K-49,999	1,357	749	608
\$50K-74,999	2,112	1,532	580
\$75K<	2,330	1,962	368
Total	8,854	5,446	3,408

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Housing Need

Just as with existing housing units, household size and household income data were used to allocate projected potential demand for housing units by affordability level (AMI groups). These ranges were compared against price points for owner-occupied (home value) and renter-occupied (gross rent) units to determine what the new households could afford without experiencing a cost burden (spending more than 30% of their annual income on housing). Among the projected owner-occupied housing units, it is anticipated that the most significant demand will be for housing within the \$150,000 to \$300,000 price range, while the greatest demand for rental units is projected for medium- (\$750-\$899 rents) to higher-income households (\$900-\$1,499 and \$1,500-\$2,499 rents).

This projected housing need is based on the anticipated income ranges of new households moving to the region. It does not account for housing need that currently exists within Wyoming's existing housing stock including the need for rental units for households earning less than \$20,000 per year. Growth among higher income groups will place additional pressure on low- and middle-income housing choice in Wyoming unless a wider variety of housing products can be developed within the community.

Table 12-6. Future Housing Need by Affordability

Affordability Level	Income Category	Home Value	New Owner Units	Gross Rent	New Renter Units
< 30% AMI	Less than \$20,000	Less than \$70,000	477	Less than \$600	1,035
30-50% AMI	\$20,000 to \$24,999	\$70,000 to \$79,999	178	\$600 to \$749	214
	\$25,000 to \$34,999	\$80,000 to \$99,999	548	\$750 to \$899	603
50-80% AMI	\$35,000 to \$49,999	\$100,000 to \$149,999	749	\$900 to \$1,499	608
80-100% AMI	\$50,000 to \$74,999	\$150,000 to \$199,999	1,532	\$1,500 to \$2,499	580
>100% AMI	\$75,000 or more	\$200,000 or more	1,962	\$2,500 and over	368
Total			5,446		3,408

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

NOTE: This calculation does not include secondary housing costs, such as monthly utility rates or insurance.

Proposed Development

Based on City permit data and information on three proposed residential and mixed use developments, there are an estimated 1,372 housing units within the development pipeline in the City of Wyoming, which are discussed in further detail later in this section. Subtracting these units from the projected potential household growth of 8,854 and accounting for a future vacancy rate of five percent, leads to an overall potential need of 7,876 new housing units through 2045.

Development Potential

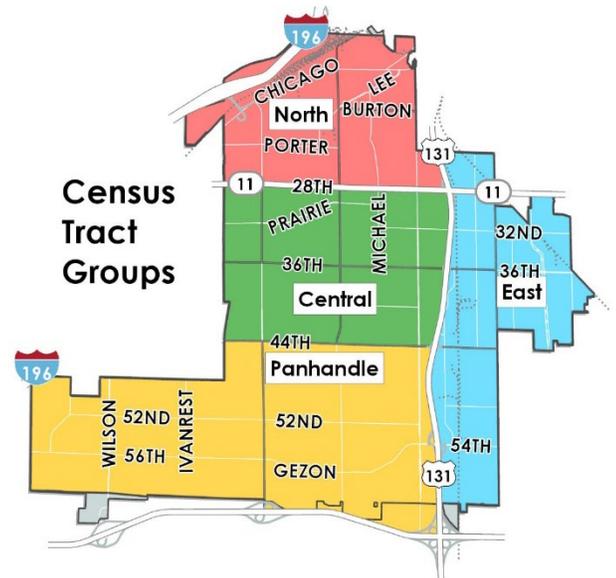
It is estimated that there are nearly 85 acres of vacant land within Wyoming that could be developed with new housing or mixed use development that includes residential units as a component of a larger project. In addition to vacant parcels, there are numerous sites that are underutilized and of a significant size that could be redeveloped to accommodate new housing or mixed use development (514.2 acres across 13 sites). The development capacity of vacant parcels and opportunity sites was estimated using a range of potential future development densities. The range of potential housing units that can be accommodated on these sites demonstrates that the City of Wyoming has the physical capacity to capture much of the household growth projected to occur through the strategic redevelopment of vacant and underutilized parcels. Doing so will require flexibility in the development process that accommodates a greater range of housing types, including a higher proportion of multi-family housing.

As a built-out community, vacant parcels and opportunity sites are often surrounded by established residential neighborhoods and commercial districts. Context-sensitive design approaches will therefore be required to facilitate successful redevelopment that enhances the overall character of the community.

Housing Needs Analysis – Existing Housing Characteristics

An evaluation of the existing housing stock is the starting part of the Housing Needs Assessment. Recent household trends as well as current housing supply were used to establish parameters for needs calculations. This section analyzes existing housing units by type and vacancy and provides an affordability comparison.

Wyoming’s geography encompasses 14 US Census Tracts, numbering from Tract 133 to Tract 145.02. To better illustrate housing need by location within the community, data regarding the existing housing stock was collected by Census Tract and then grouped according to geography into four local subareas, roughly representing the Northern, Eastern, Central, and Southern or “Panhandle” areas of the City.



Housing Tenure (Owner or Renter)

Table 12-9 indicates the number of existing housing units by tenure (i.e. owner-occupied vs renter) per census tract. The U.S. Census defines housing tenure as follows:

“A unit is owner occupied if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is "owner occupied" only if the owner or co-owner lives in it. All other occupied units are classified as "renter occupied," including units rented for cash rent and those occupied without payment of cash rent.”

Nearly two-thirds of all housing units in Wyoming are owner-occupied. The Panhandle subarea has a slightly higher percentage of owner-occupied units (75%) and the Central subarea’s percentage is slightly lower (58%). The Ramblewood Apartments complex accounts for more than one-third of all rental units in the Central subarea. When this complex is excluded from the unit total, the Central subarea’s owner occupancy increases to 68%.

Table 12-9. Housing Units by Tenure

Subarea	Census Tract	Total Units	Owner-Occupied		Renter-Occupied	
			Count	Percent	Count	Percent
North	133	1,591	1,066	67%	525	33%
	134	2,094	1,463	70%	631	30%
	135	1,803	993	55%	810	45%
	Subarea Total	5,488	3,522	64%	1,966	36%
Central	137	2,572	1,877	73%	695	27%
	138.01	711	409	58%	302	42%
	138.02	2,974	954	32%	2,020	68%
	139	2,735	1,603	59%	1,132	41%
	140	2,792	2,042	73%	750	27%
	Subarea Total	11,784	6,885	58%	4,899	42%
East of US-131	136	732	494	67%	238	33%
	141	704	538	76%	166	24%
	142	1,361	948	70%	413	30%
	143	1,078	795	74%	283	26%
	Subarea Total	3,875	2,775	72%	1,100	28%
Panhandle	145.01	3,840	2,847	74%	993	26%
	145.02	2,953	2,246	76%	707	24%
	Subarea Total	6,793	5,093	75%	1,700	25%
Total all Census Tracts		27,940	18,275	65%	9,665	35%

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Unit Type

The accompanying tables present current housing supply by unit type (i.e. single-family detached, single-family attached, multifamily, or manufacture home) and by tenure (i.e. owner- or renter-occupied). The majority of units within each tract are single-family detached, and a majority of those are owner-occupied. Tract 138.02 is the only tract where the majority of rental units are rental (68%) and nearly all rental units are in multi-family buildings. While as a whole rental housing is predominantly provided in multifamily buildings, a significant portion of rental housing is provided in single-family detached homes within the North subarea (36%) and East of US-131 subarea (65%). Tract 141 is an outlier in that 90% of renter-occupied units are single-family detached units.

SFD – Single-Family Detached

SFA – Single-Family Attached

MF – Multifamily

MH – Manufactured Home

Table 12-10. Owner Housing Type

Subarea	Census Tract	Total Units	Owner-Occupied	Owner SFD	Owner SFA	Owner MF	Owner MH
North	133	1,591	1,066	90%	9%	1%	0%
	134	2,094	1,463	88%	4%	8%	0%
	135	1,803	993	91%	2%	6%	1%
	Subarea Total	5,488	3,522	89%	5%	5%	0%
Central	137	2,572	1,877	99%	0%	0%	1%
	138.01	711	409	59%	32%	9%	0%
	138.02	2,974	954	95%	3%	2%	0%
	139	2,735	1,603	95%	5%	0%	0%
	140	2,792	2,042	99%	0%	0%	1%
	Subarea Total	11,784	6,885	95%	3%	1%	0%
East of US-131	136	732	494	97%	3%	0%	0%
	141	704	538	99%	1%	0%	0%
	142	1,361	948	95%	4%	1%	0%
	143	1,078	795	99%	1%	0%	0%
	Subarea Total	3,875	2,775	97%	2%	0%	0%
Panhandle	145.01	3,840	2,847	80%	9%	2%	9%
	145.02	2,953	2,246	88%	2%	0%	10%
	Subarea Total	6,793	5,093	84%	6%	1%	9%
Total all Census Tracts		27,940	18,275	91%	4%	2%	3%

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Table 12-11. Renter Housing Type

Subarea	Census Tract	Total Units	Renter-Occupied	Renter SFD	Renter SFA	Renter MF	Renter MH
North	133	1,591	525	59%	24%	5%	11%
	134	2,094	631	38%	18%	44%	0%
	135	1,803	810	19%	9%	72%	0%
	Subarea Total	5,488	1,966	36%	16%	45%	3%
Central	137	2,572	695	26%	5%	69%	0%
	138.01	711	302	2%	22%	76%	0%
	138.02	2,974	2,020	3%	5%	91%	1%
	139	2,735	1,132	7%	9%	84%	0%
	140	2,792	750	27%	8%	65%	0%
	Subarea Total	11,784	4,899	11%	7%	81%	0%
East of US-131	136	732	238	57%	10%	33%	0%
	141	704	166	90%	2%	7%	0%
	142	1,361	413	71%	17%	12%	0%
	143	1,078	283	47%	7%	45%	0%
	Subarea Total	3,875	1,100	65%	11%	24%	0%
Panhandle	145.01	3,840	993	10%	7%	82%	0%
	145.02	2,953	707	4%	2%	89%	5%
	Subarea Total	6,793	1,700	8%	5%	85%	2%
Total all Census Tracts		27,940	9,665	22%	9%	68%	1%

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Vacancy

Less than five percent of Wyoming's existing housing stock is vacant. Most tracts have very low vacancy rates, especially among owner-occupied housing units. Only tract 136 and 142 have above-average (4.7% for all tracts) vacancy rates when analyzing by tenure with vacancies occurring solely within rental units. For total vacancy, there are five tracts over five percent: 133, 136, 137, 142, and 143.

Only 834 vacant units in Wyoming are available for owner or renter occupancy (vacant units available for sale or rent), representing just three percent of the total housing stock. The remainder of other vacant units (468) are defined by the US Census as seasonal homes, temporary housing structures, or recreation-related units. The 834 units can be used to accommodate future households while the remaining 468 should not be included in calculations for year-round occupancy.

Table 12-12. Vacancy Rate by Tenure

Subarea	Census Tract	Total Units	Units		Vacancy as Percent of All Units		
			Occupied	Vacant	Owner	Renter	Other
North	133	1,591	1,506	85	1%	2%	2%
	134	2,094	2,060	34	0%	1%	0%
	135	1,803	1,739	64	0%	1%	2%
	Subarea Total	5,488	5,305	183	0%	1%	1%
Central	137	2,572	2,337	235	2%	1%	5%
	138.01	711	701	10	0%	0%	1%
	138.02	2,974	2,853	121	0%	4%	0%
	139	2,735	2,611	124	0%	3%	2%
	140	2,792	2,738	54	0%	2%	0%
	Subarea Total	11,784	11,240	544	0%	2%	2%
East of US-131	136	732	576	156	0%	14%	5%
	141	704	670	34	1%	0%	3%
	142	1,361	1,242	119	0%	7%	2%
	143	1,078	970	108	3%	4%	0%
	Subarea Total	3,875	3,458	417	1%	6%	2%
Panhandle	145.01	3,840	3,697	143	2%	1%	0%
	145.02	2,953	2,938	15	0%	0%	5%
	Subarea Total	6,793	6,635	158	1%	1%	2%
Total all Census Tracts		27,940	26,638	1,302	1%	2%	1%

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Affordability

This analysis compares existing housing stock values and rents to household incomes for owner- and renter-occupied units. For-sale home values and lease rates for renter-occupied units are categorized to align with income ranges that can afford those units without experiencing a housing cost burden (defined as spending 30% or more of annual income on housing). For example, a renter household earning \$34,999 a year can afford to pay up to \$875/month (\$10,500/year) in rent. The same is true for owner households assuming a four percent mortgage rate.

Price points are also grouped by area median income (AMI) affordability levels. The AMI of \$69,000 used to define these groups is for a three-person household, which is similar to Wyoming's average household size of 2.7 and average family size of 3.2. The discrepancy between income and price demonstrates the existence of a surplus or deficit in units within a given income range for Wyoming's 2017 household population. The following formula was used to determine housing need within the existing housing stock:

Households earning an income within a given range

– Units provided at home value/lease rate affordable at given income

Surplus/Deficit within given income range

Table 12-13 summarizes the income groups, home value ranges, and gross rent ranges that align with varying AMI affordability levels. These ranges set by the ACS and therefore income, value, and rent do not precisely align with affordability levels. For example, the example household discussed previously that earns \$34,999 annually and can afford up to \$875 in monthly rent would fall into the \$750 to \$899 rent range and would be considered at the upper end of the 30 to 50% AMI group.

These housing cost burden calculations are general and provide a guide as what housing value a household can afford. Other factors must be taken into consideration when defining housing affordability. As discussed in Section 2 of the AI, transportation costs are typically a household's second largest expenditure and can contribute significantly to the home a household can afford. Similarly, the increasing number of households with student debt is impacting ability for households to pay for housing or save for the down payment typically needed to own a home.

Table 12-13. Maximum Housing Value and Monthly Affordable Rent by Household Income Range

Area Median Income	Household Income	Home Value	Gross Rent
< 30%	Less than \$5,000	\$0 to \$14,999	0 to \$149
	\$5,000 to \$9,999	\$15,000 to \$29,999	\$150 to \$299
	\$10,000 to \$14,999	\$30,000 to \$49,999	\$300 - \$449
	\$15,000 to \$19,999	\$50,000 to \$69,999	\$450 to \$599
30-50%	\$20,000 to \$24,999	\$70,000 to \$79,999	\$600 to \$749
	\$25,000 to \$34,999	\$80,000 to \$99,999	\$750 to \$899
50-80%	\$35,000 to \$49,999	\$100,000 to \$149,999	\$900 to \$1,499
80-100%	\$50,000 to \$74,999	\$150,000 to \$199,999	\$1,500 to \$2,499
>100%	\$75,000 to \$99,999	\$200,000 to \$299,999	\$2,500 and over
	\$100,000 to \$149,999	\$300,000 to \$399,999	
	\$150,000 or more	\$400,000 or more	

Source: HUD; Houseal Lavigne Associates

NOTE: Low Income Households and Housing Subsidies. There is an important consideration regarding lower income households that impacts virtually every housing market in the country. The U.S. Department of Housing and Urban Development (HUD) defines households earning 30% or less of AMI as Extremely Low-Income (ELI) households. While many of these households are cost burdened (spending in excess of one-third of their income on housing) ELI households qualify for housing subsidy programs and are typically not market-rate homeowners and renters. It is an important consideration for cities such as Wyoming that have a large segment of the population that is cost burdened to ensure that future development and housing programs meet the needs of these households.

Owner-Occupied

In reconciling Wyoming home prices and rents with household incomes, the existing housing supply within the City is generally affordable. As it relates to owner-occupied housing, there is a defined shortage of housing units for households earning incomes of \$50,000 or greater (roughly 80% of AMI and above). Indications are that the existing supply corresponds with demand for those households earning below \$50,000 (less than 80% of AMI). The indicated surplus of lower priced units is being largely offset by the deficit of higher priced units, as those households earning greater than 80% of AMI are purchasing homes that are less than what they may otherwise afford.

Table 12-14. Owner Affordability Comparison by Income Range

Subarea	Area Median Income	< 30%	30-50%		50-80%	80-100%	> 100%
			\$20K-	\$25K-	\$35K-	\$50K-74,999	\$75K+
Census Tract	<\$20K	24,999	34,999	49,999	\$50K-74,999	\$75K+	
North	133	214	89	196	102	-287	-314
	134	150	17	253	395	-444	-371
	135	189	46	53	163	-241	-210
	Subarea Surplus/Deficit	553	152	502	660	-972	-895
Central	137	90	206	416	172	-414	-470
	138.01	26	33	26	81	-38	-128
	138.02	54	69	92	412	-298	-329
	139	-31	0	142	739	-48	-802
	140	107	-22	356	572	-567	-446
Subarea Surplus/Deficit	246	286	1,032	1,976	-1,365	-2,175	
East of US-131	136	71	33	127	44	-120	-155
	141	99	49	78	21	-166	-81
	142	157	125	234	-44	-319	-153
	143	141	72	236	-64	-206	-179
Subarea Surplus/Deficit	468	279	675	-43	-811	-568	
Panhandle	145.01	94	-39	-133	237	109	-268
	145.02	62	-47	-48	121	274	-362
	Subarea Surplus/Deficit	156	-86	-181	358	383	-630
Total Surplus/Deficit for all Tracts	1,423	631	2,028	2,951	-2,765	-4,268	

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Renter-Occupied

For renter-occupied units, there is demand for an additional 1,003 housing units among households earning less than \$20,000 (which is approximately equivalent to less than 30% AMI). Similarly, there is demand for an additional 2,010 units among higher-income renters earning \$50,000 or more a year (at least 80% AMI). This deficit of housing units at higher price points could be partially offset by a surplus of housing units available at lower price points (for households earning between \$20,000 and \$50,000).

For renter-occupied units, there is demand for approximately 1,000 units for households earning less than \$20,000 (which is roughly equivalent to less than 30% of AMI). Similarly, higher-income renters earning \$50,000 or more a year (roughly 80% of AMI) could support an additional 2,000 units. The indicated surplus of units deemed affordable for those earning between 30% and 80% of AMI is an indication of two dynamics occurring in the market. These units are being absorbed due to lower income, cost burdened households expending a disproportionate percentage of their incomes on housing, while higher income households are spending less than 30% of income on housing due to lack of availability.

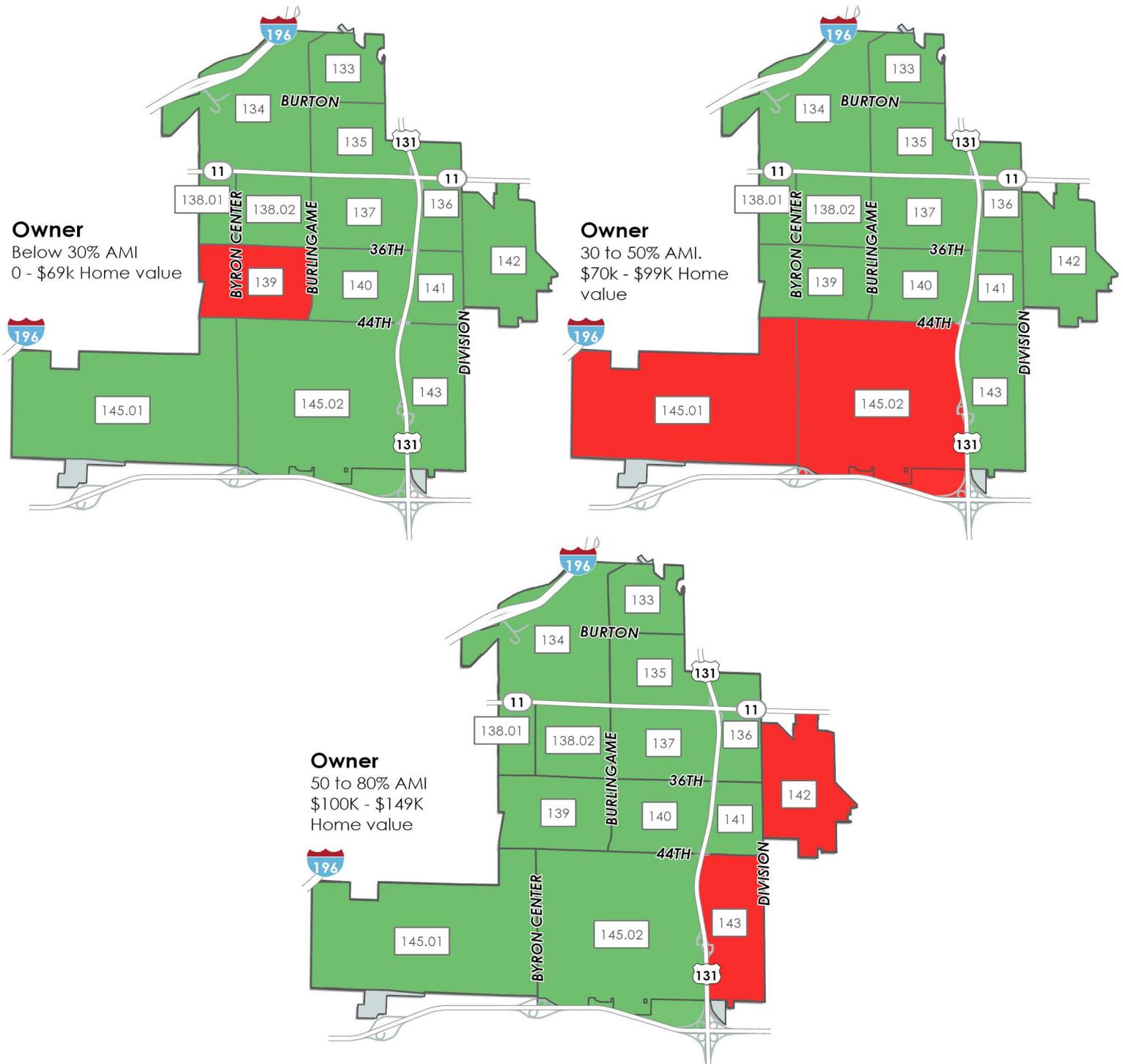
Table 12-15. Renter Affordability Comparison by Income Range

Subarea	Area Median Income Census Tract	< 30%	30-50%		50-80%	80-100%	> 100%
		<\$20K	\$20K- 24,999	\$25K- 34,999	\$35K- 49,999	\$50K-74,999	\$75K+
North	133	-68	105	40	32	-88	-21
	134	-91	183	-55	158	-73	-122
	135	124	-103	-188	-49	100	116
	Subarea Surplus/Deficit	-35	185	-203	141	-61	-27
Central	137	-205	197	36	70	-51	-47
	138.01	-42	12	47	28	-27	-18
	138.02	-371	726	-25	129	-350	-109
	139	-86	73	172	75	-179	-55
	140	-29	347	-77	-98	-55	-88
	Subarea Surplus/Deficit	-733	1,355	153	204	-662	-317
East of US-131	136	-10	7	10	77	-64	-20
	141	15	5	13	38	-41	-30
	142	28	48	28	-9	-70	-25
	143	-64	38	5	77	-49	-7
	Subarea Surplus/Deficit	-31	98	56	183	-224	-82
Panhandle	145.01	-151	149	15	365	-156	-222
	145.02	-53	156	214	-58	-117	-142
	Subarea Surplus/Deficit	-204	305	229	307	-273	-364
Total Surplus/Deficit for all Tracts		-1,003	1,943	235	835	-1,220	-790

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Figure 12-1.
Income Comparison for Housing Need
by Area Median Income (AMI) for Owner Households

- Undersupplied
- Oversupplied

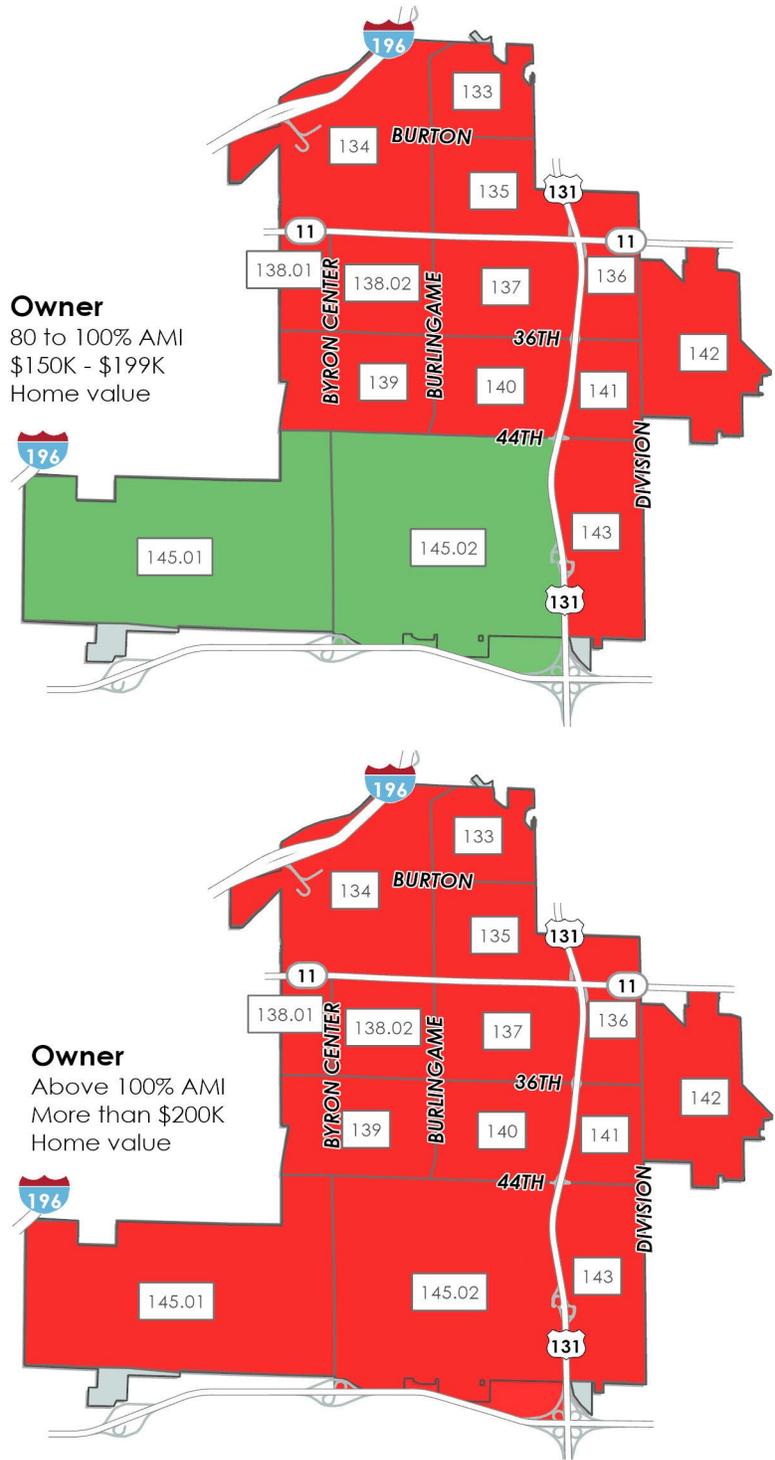


Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Wyoming, Michigan – Analysis of Impediments to Housing Choice & Housing Needs Assessment
 Prepared by Houseal Lavigne and Lee Nelson Weber

Figure 12-1. (Continued)
Income Comparison for Housing Need
by Area Median Income (AMI) for Owner Households

- Undersupplied
- Oversupplied



Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates
 Wyoming, Michigan – Analysis of Impediments to Housing Choice & Housing Needs Assessment
 Prepared by Houseal Lavigne and Lee Nelson Weber

Figure 12-2.
Income Comparison for Housing Need
by Area Median Income (AMI) for Renter Household

- Undersupplied
- Oversupplied

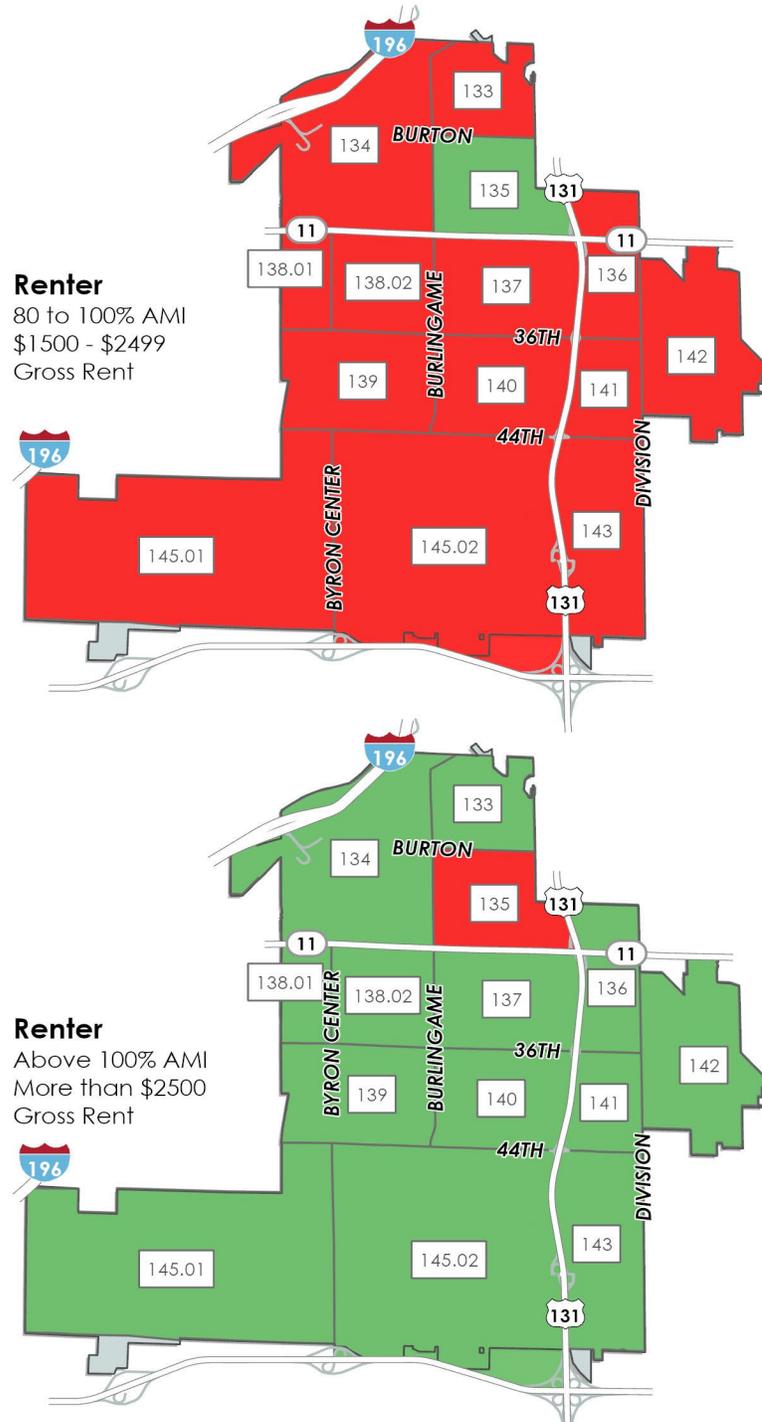


Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Wyoming, Michigan – Analysis of Impediments to Housing Choice & Housing Needs Assessment
 Prepared by Houseal Lavigne and Lee Nelson Weber

Figure 12-2. (Continued)
Income Comparison for Housing Need
by Area Median Income (AMI) for Renter Households

- Undersupplied
- Oversupplied



Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Household Growth

The Grand Valley Metropolitan Council (GVMC) monitors growth in the region and calculates future estimates of both population and households for all of its member communities. The GVMC projects that Wyoming will gain nearly 8,854 new households between 2017 and 2045. These household projections have been used to calculate potential future housing need. Given the relatively low vacancy rate within Wyoming’s existing housing stock, new development will be needed to accommodate nearly all potential growth and demand for new housing units.

Table 12-16. Grand Valley Metropolitan Council Population and Household Projections

	2017	2020	2025	2030	2035	2040	2045	CAGR*
Population	75,124	78,435	80,910	82,712	84,311	85,796	87,379	.5%
Households	27,940	30,924	32,407	33,636	34,795	35,825	36,794	.9%

* CAGR = Compound Annual Growth Rate

Source: Grand Valley Metropolitan Council; Houseal Lavigne Associates

Group Quarters

In any community, a certain portion of the population lives in “group quarters” or non-traditional residences where a group of people reside (permanently or temporarily), and the owner of the property provides housing and/or services for the residents. Group quarters often include college/university residence halls, military barracks, nursing homes, and correctional facilities. Historically, the population living in group quarters has made up less than one percent of Wyoming’s total population and represented only 0.6% of the total population in 2017. Since this population represents a minimal amount of the total, no adjustments have been made in the needs calculation for any future residents in group quarters.

Future Household Size

Household size trends were evaluated to determine potential demand for future housing units needed by size (i.e. number of bedrooms). Demand for housing units of a given size was then allocated to anticipated future owner and renter households. The compound annual growth rate (CAGR) for the tenure of households by household size and unit type was calculated to identify growth patterns between 2010 and 2017. The CAGR identifies the constant rate of change in household growth experienced in each tract over the seven-year period from 2010 to 2017. Assuming future growth will generally mirror recent trends, the allocation of the future households has been extrapolated across each tract for both owner and renter households by household size. These patterns were also adjusted to incorporate a national trend in growing demand for rental housing. This growth change was then applied to the 8,854 new households the City is projected to gain through 2045. The tables below show the anticipated distribution of the new households by household size.

Table 12-17. Average 2010-2017 CAGR per Household Size by Tenure

	1-person household:	2-person household:	3-person household:	4-person household:	5+person household:
Owner CAGR	-0.9%	1.3%	-0.7%	-2.3%	-2.8%
Renter CAGR	1.4%	4.8%	3.3%	1.7%	3.7%

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Table 12-18. Future Owner Household Size

Subarea	Census Tract	Total	Owner occupied	1-person household	2-person household	3-person household	4-person household	5+-person household
North	133	486	319	57	94	47	50	71
	134	682	436	100	158	52	68	58
	135	575	287	80	109	34	23	40
	Subarea Total	1,743	1,042	237	361	133	141	169
Central	137	843	570	123	170	140	72	65
	138.01	221	119	49	46	11	4	9
	138.02	953	268	40	124	48	33	24
	139	854	473	57	222	97	65	32
	140	893	634	145	239	135	76	39
	Subarea Total	3,764	2,064	414	801	431	250	169
East of US-131	136	219	144	35	39	24	32	14
	141	222	159	55	43	14	22	24
	142	433	282	71	75	62	47	28
	143	340	233	43	57	50	62	21
	Subarea Total	1,213	818	204	214	150	163	87
Panhandle	145.01	1,214	845	89	356	158	89	154
	145.02	920	677	83	251	201	83	58
	Subarea Total	2,134	1,522	172	607	359	172	212
Total		8,854	5,446	1,027	1,983	1,073	726	637

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Houseal Lavigne Associates

Table 12-19. Future Renter Household Size

Subarea	Census Tract	Total	Renter occupied	1-person household	2-person household	3-person household	4-person household	5+-person household
North	133	486	167	23	39	59	8	39
	134	682	246	113	60	39	3	30
	135	575	288	99	59	32	52	46
	Subarea Total	1,743	701	235	158	130	63	115
Central	137	843	272	103	73	25	23	49
	138.01	221	102	50	16	22	10	4
	138.02	953	685	275	177	118	62	54
	139	854	381	180	114	41	28	17
	140	893	259	117	55	46	20	21
	Subarea Total	3,764	1,699	725	435	252	143	145
East of US-131	136	219	75	16	6	12	26	14
	141	222	63	7	25	8	7	16
	142	433	151	21	47	19	21	43
	143	340	107	15	41	17	30	3
	Subarea Total	1,213	396	59	119	56	84	76
Panhandle	145.01	1,214	370	113	158	58	26	15
	145.02	920	243	129	69	18	10	18
	Subarea Total	2,134	613	242	227	76	36	33
Total		8,854	3,409	1,261	939	514	326	369

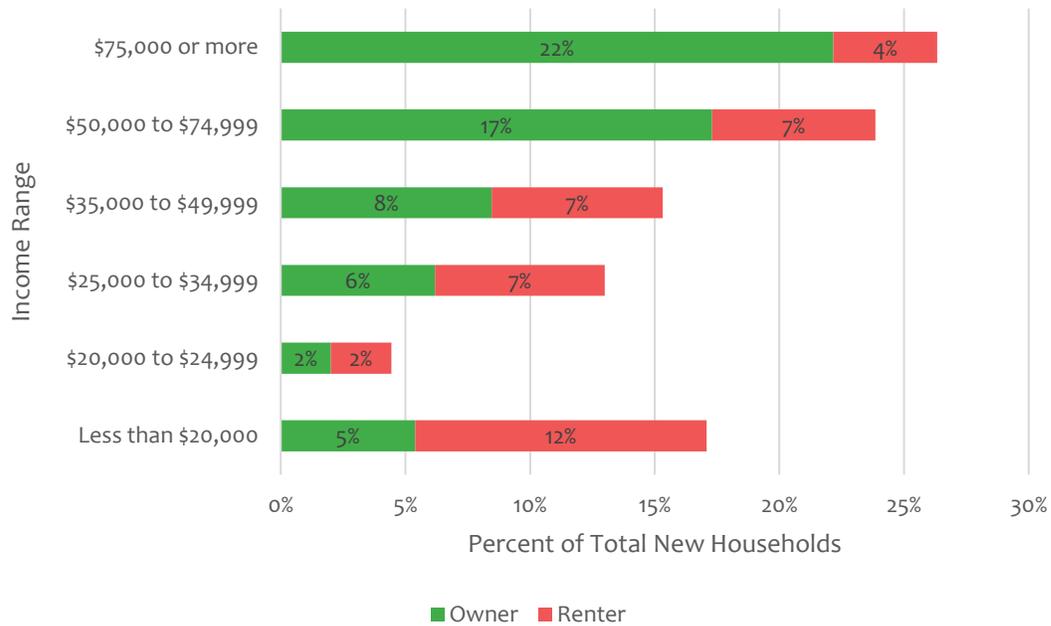
Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; GVMC; Houseal Lavigne Associates

NOTE: Numbers may not add up due to rounding.

Future Household Income

Income ultimately determines the amount a household can pay for housing. Similar to the household size analysis, the CAGR for household incomes by tenure was used to allocate the City's projected future households into income categories. It is projected that half of all new households will earn incomes of \$50,000 or more (greater than 80% AMI) and that three out of four of those households will own their home. Among households earning less than \$50,000, it is projected that approximately 42% will own their home and 58% will rent.

Figure 12-3. Future Household Income Distribution by Tenure



Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Grand Valley Metropolitan Council; Houseal Lavigne Associates

Projected Housing Need

As with the existing housing stock, the number of projected households have been evaluated by income group to identify the number of owner- and renter-occupied housing units needed by price point and lease rate. The additional 8,854 households projected to potentially locate in Wyoming have been assigned to income categories and tenure groups (i.e. owner versus renter).

Housing Trends

Renter occupancy has increased across individual census tracts and the City as a whole since 2010. National occupancy is trending in a similar manner. These trends are due to several factors including:

1. Mortgage regulations have changed, such as making it harder to get a mortgage;
2. Construction financing requirements for condominium projects have become more stringent, often requiring at least 50% of the units to be sold prior to construction; and
3. A general lifestyle trend toward rental housing, which is partially due to choice and partially to the first two factors cited above.

These factors have combined to result in a national trend toward multifamily housing. While single-family housing will continue to accommodate a significant portion of household demand, multifamily is anticipated to constitute a greater part of the total housing stock. The allocation of housing-unit need within each census tract is based on the compositions of the existing housing stock, past trends, and recent development. The total need must be accommodated where available land and redevelopment at increased density will allow.

Projected Housing Need by Tenure

Tables 12-20 and 12-21 summarize projected housing need by income for both owner- and renter-occupied units. Based on current housing stock characteristics and a national trend toward increased residential development, it is assumed that 61.5% of future households will be homeowners and 38.5% will be renter households. Among the projected owner-occupied housing units, it is anticipated that the most significant demand will be for housing within the \$150,000 to \$300,000 price range. Demand for rental units is projected to exist at multiple price ranges. It is anticipated that as growth occurs, the greatest rental need will be among medium- (\$750-\$899 rents) to higher-income households (\$900-\$1,499 and \$1,500-\$2,499 rents).

Table 12-20. Projected Owner-occupied Housing Unit Need by Income

Affordability Level	Income Category	Percent of Owner Households	Percent of All New Households	Home Value	New Units
< 30% AMI	Less than \$20,000	9%	5%	Less than \$70,000	477
30-50% AMI	\$20,000 to \$24,999	3%	2%	\$70,000 to \$79,999	178
	\$25,000 to \$34,999	10%	6%	\$80,000 to \$99,999	548
50-80% AMI	\$35,000 to \$49,999	14%	8%	\$100,000 to \$149,999	749
80-100% AMI	\$50,000 to \$74,999	28%	17%	\$150,000 to \$199,999	1,532
>100% AMI	\$75,000 or more	36%	22%	\$200,000 or more	1,962
	Total	100%	62%		5,446

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Grand Valley Metropolitan Council; Houseal Lavigne Associate

Table 12-21. Rental Housing Unit Need by Income

Affordability Level	Income Category	Percent of Renter Households	Percent of All New Households	Gross Rent	New Units
< 30% AMI	Less than \$20,000	30%	12%	Less than \$600	1,035
30-50% AMI	\$20,000 to \$24,999	6%	2%	\$600 to \$749	214
	\$25,000 to \$34,999	18%	7%	\$750 to \$899	603
50-80% AMI	\$35,000 to \$49,999	18%	7%	\$900 to \$1,499	608
80-100% AMI	\$50,000 to \$74,999	17%	7%	\$1,500 to \$2,499	580
>100% AMI	\$75,000 or more	11%	4%	\$2,500 and over	368
Total		100%	38%		3,408

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census; Grand Valley Metropolitan Council; Houseal Lavigne Associates

Proposed Development

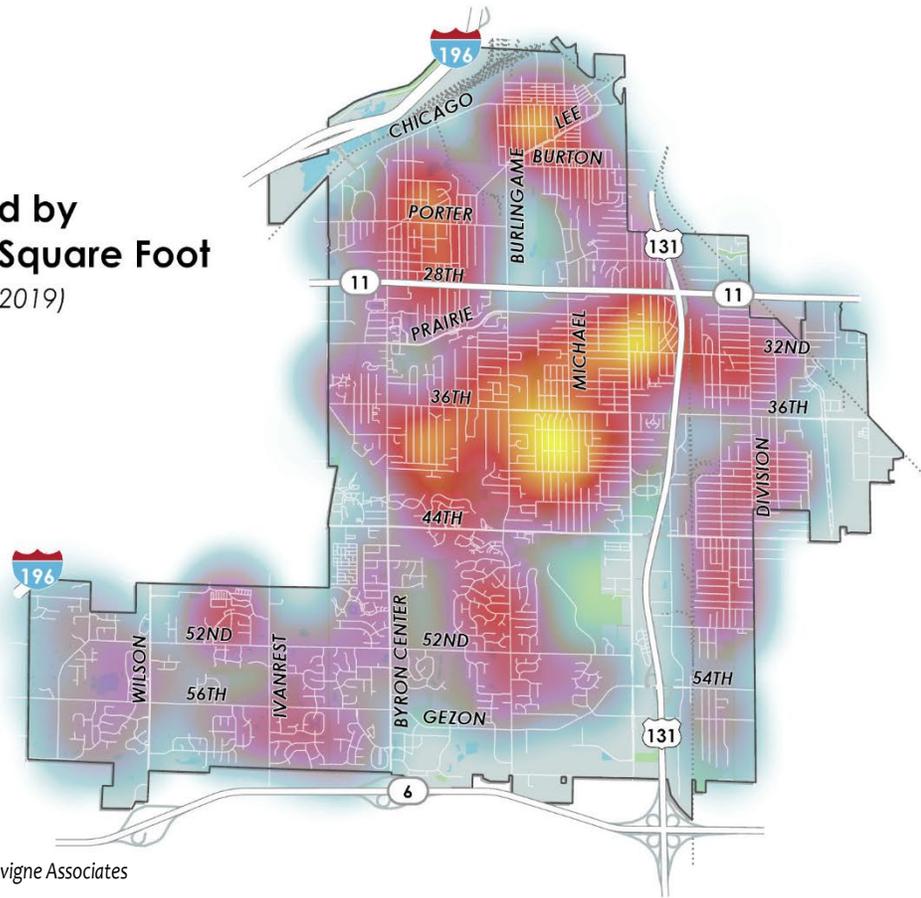
While it is projected that Wyoming could grow by as many as 8,854 households by 2045, recent and anticipated development will absorb a portion of this anticipated housing demand. Figures 12-4 and 12-5 present recent housing activity in Wyoming. Figure 12-4 illustrates the concentration of recently sold homes by their sale price. Between January 2018 and July 2019, the highest sales price per square foot was recorded in the Central and North subareas of the City. Figure 12-5 illustrates rental units per acre in Wyoming based on the City’s rental housing registry. The largest concentration of rental units is located in the Central subarea of Wyoming. This map excludes the very large Ramblewood Apartments complex (1,710 units), which are also located in the Central subarea, to prevent skewing the results.

Building Permit Activity

Since 2018, the City of Wyoming has issued an estimated 91 permits for the construction of 162 units (including 80 single-family homes and condominium units and 82 multifamily units). These projects represent new housing units that would not have been included in the 2013-2017 American Community Survey 5-Year Estimates utilized in this report. As illustrated in Figure 12-6, while permitting activity has increased in the Central and North subareas since 2015, the majority of the activity has been focused in the Panhandle subarea, particularly to the west of Byron Center Avenue SW. This is likely due to the availability of greenfield development opportunities.

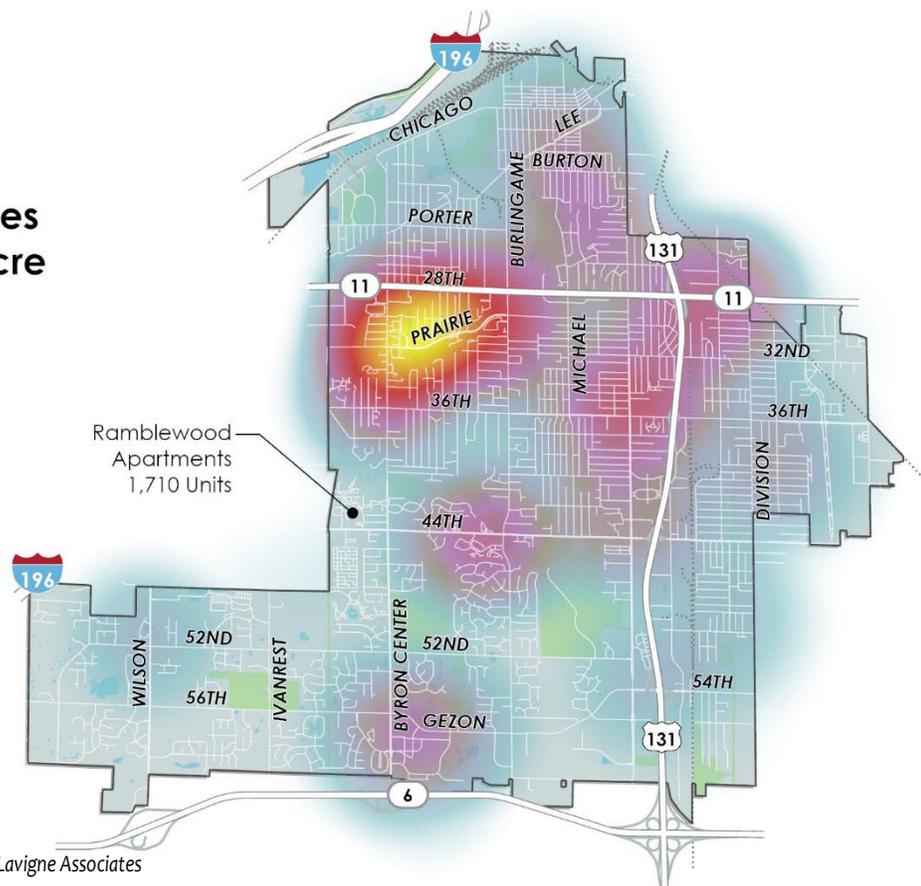
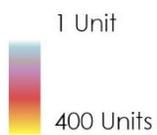
Figure 12-4.
Residential Sold by
Sale Price per Square Foot

(January 2018 - July 2019)



Source: MLS: MichRIC®; Houseal Lavigne Associates

Figure 12-5.
Rental Properties
by Units per Acre

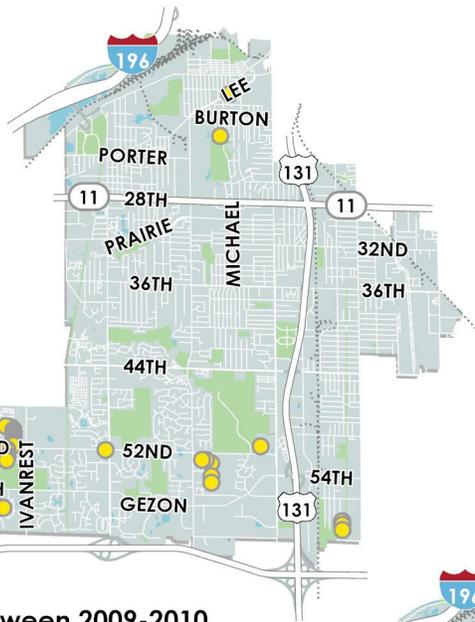


Source: City of Wyoming; Houseal Lavigne Associates

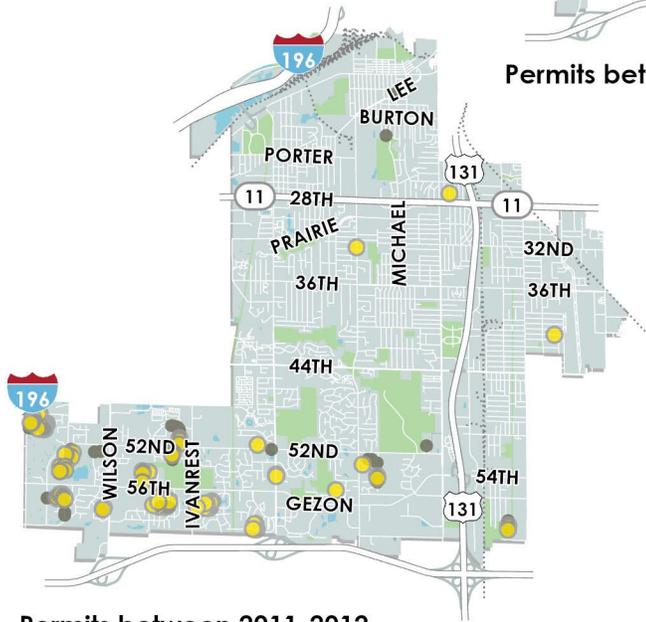
Figure 12-6 Residential Building Permits Issued 2009 to 2019 YTD

- Permits Issued
- Previous Permits Issued
- Road Labels

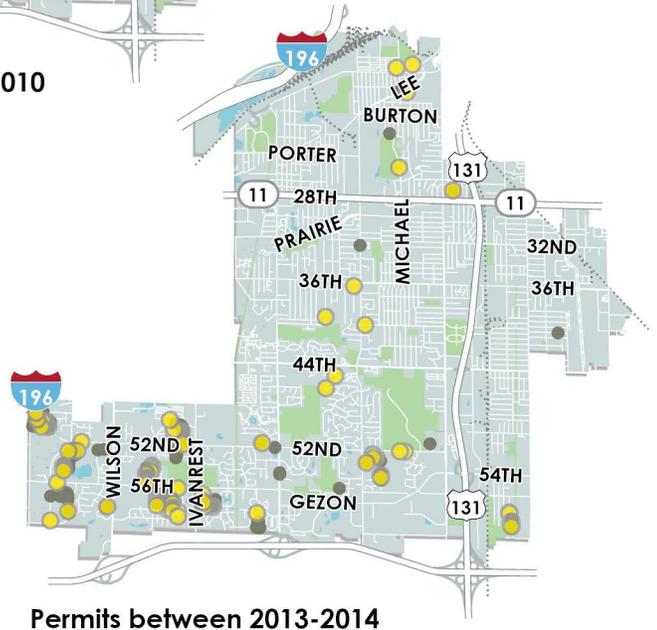
Source: City of Wyoming; Houseal Lavigne Associates



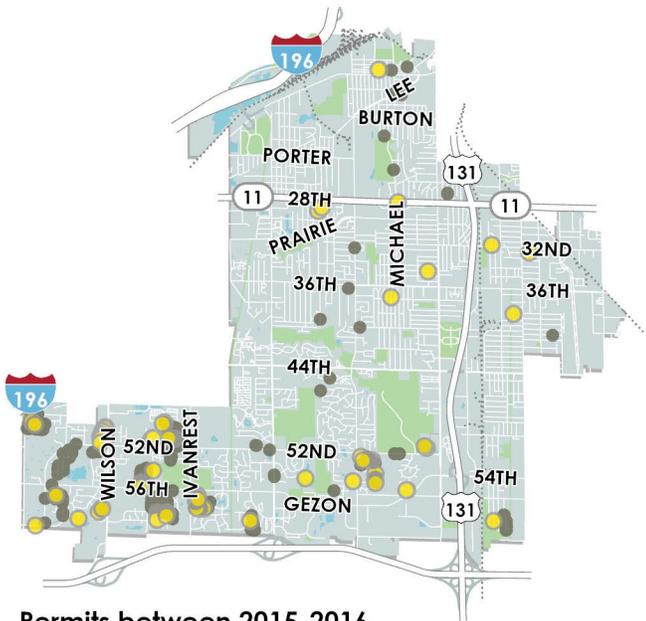
Permits between 2009-2010



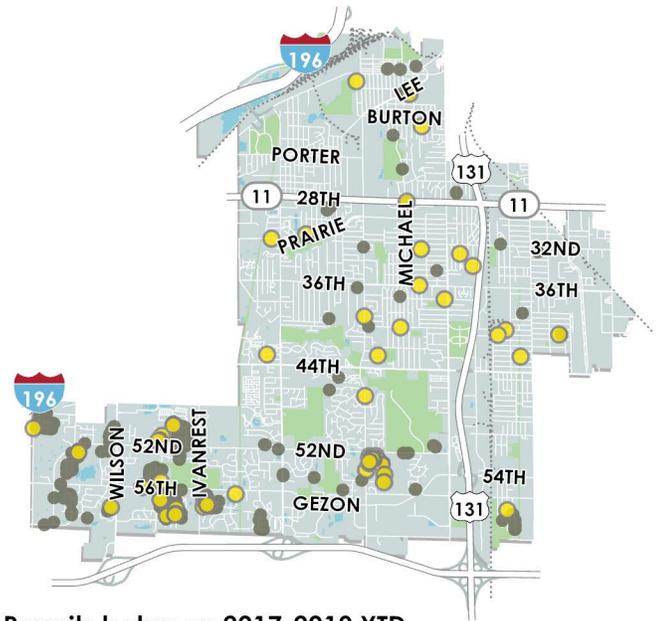
Permits between 2011-2012



Permits between 2013-2014



Permits between 2015-2016



Permits between 2017-2019 YTD

Proposed Development

In addition to recently issued building permits, there are three proposed projects of considerable size that could result in the development of an estimated 1,210 housing units.

- **The Reserve**, which is a recently approved Planned Unit Development that will include a mix of 300 apartments, 138 condominiums, and 185 single-family homes.
- **HÔM Flats at 28 West**, which is a recently approved mixed-income project that received Michigan State Housing Development Authority funding through a low-income housing tax credit, with 226 market-rate and targeted low- and moderate-income apartments. Another 198 apartments are planned for the second phase of the development.
- An age-targeted housing development proposed for the northeast corner of **Michael Avenue SW and 36th Street**. This project is proposed to include 163 units and would include adaptive reuse of an existing commercial building and redevelopment of the adjacent parking lot.

In total, when accounting for recently permitted housing units and proposed residential development, there are 1,372 housing units within the development pipeline in the City of Wyoming. This means that an estimated 7,482 new housing units will need to be built over the next 25 years to accommodate household growth projected through 2045.

Some vacancy is needed to accommodate healthy turnover within the housing market and provide additional options for future residents. An additional 394 units, based on the current vacancy of five percent, would be desired in addition to the needed 7,482 units. This results in an overall need for 7,876 housing units through 2045, as shown in Table 12-22.

Table 12-22. Recent Building Permits, Proposed Development, and Projected Housing Unit Need, Wyoming, 2019

	Acres	Housing Units
Projected Household Growth (through 2045)	-	8,854
Building Permits	-	162
The Reserve	187	623
HÔM Flats at 28 West	7	424
Michael Avenue SW and 36th Street	6	163
- Proposed Development Subtotal	200	1,372
Unmet Housing Need		7,482
+ Future Vacancy 5%		394
Total Housing Need		7,876

Source: City of Wyoming; Houseal Lavigne Associates

Development Potential

The ability to capture projected household growth will require a strategic approach to development that leverages vacant and underutilized sites throughout the community (Tables 12-24 and 12-25). As a predominantly built-out community, large vacant parcels are limited and redevelopment of underutilized sites will be required to meet housing demand.

Vacant Sites

Existing land use was inventoried across the City as part of the **Wyoming [re]Imagined Master Plan** process. It is estimated that there are nearly 85 acres of vacant land within Wyoming that could be developed with new housing or mixed use development that includes residential units as a component of a larger project.

Table 12-23 summarizes the development capacity of vacant parcels if they were to be developed for housing. At five dwelling units (d.u.) per acre, vacant parcels within Wyoming could accommodate approximately 424 new housing units. When this gross development density is increased to 10 and 15 d.u. per acre, the city-wide potential development capacity on vacant sites increases to between 848 and 1,272 new housing units respectively.

Subtracting these potential units from the projected housing need (after accounting for proposed development) results in a remaining total of between 6,604 and 7,452 housing units needed. With no vacant land available for development to accommodate this projected potential housing need, additional housing density will need to be incorporated into the strategic redevelopment of previously developed parcels.

Table 12-23. Potential Development Capacity of Vacant Parcels, Wyoming, 2019

Total Housing Need (minus proposed development)		7,876		
Zoning	Acres	Development Capacity		
		5 d.u. per acre	10 d.u. per acre	15 d.u. per acre
Residential	57.1	286	571	857
Form Based Code	13.3	67	133	200
Commercial	14.4	72	144	216
– Vacant Land Development Potential Subtotal	84.8	424	848	1,272
Remaining Total Housing Need		7,452	7,028	6,604

Source: Houseal Lavigne Associates

NOTE: Mixed use development on parcels within a commercial or Form Based Code zoning district would likely be developed at a lower density than residential parcels since a portion of a given site would be dedicated to non-residential development. As such, the true residential development capacity of vacant parcels in Wyoming is likely less than as is summarized in Table 12-22 and additional opportunities will need to be identified to accommodate new housing through the strategic redevelopment of opportunity sites.

Redevelopment Opportunity Sites

There are numerous sites throughout the City of Wyoming that are underutilized, and of a significant size that could be redeveloped to accommodate new housing or mixed use development. Several of these properties are located in light industrial or commercial areas and have structures that are mostly vacant or large areas dedicated to outdoor storage. Other areas are occupied by rural, low density single-family homes and have large areas of open space. For the purposes of this analysis, two golf course properties and a driving range have also been identified as redevelopment opportunity sites.

Table 12-24 provides an overview of the redevelopment opportunity sites, which are mapped in Figure 12-4 along with vacant parcels and the three proposed development sites discussed previously. Table 12-25 estimates development capacity for potential redevelopment opportunity sites.

These opportunity sites possess the potential to accommodate an additional total of between 2,571 and 7,713 housing units depending on the density of proposed projects. Gross density of between 13 and 15 units d.u. per acre would be needed to absorb projected household growth through 2045 (which is between 6,604 and 7,452 housing units once accounting for proposed development, vacancy, and development potential on vacant sites).

Table 12-24. Potential Development Capacity of Redevelopment Opportunity Sites, Wyoming, 2019

Site Address	Current Land Use	Zoning	Acres
1345 Clyde Park Avenue	Industrial	I-2 General Industrial	32
155 28th Street SW	Parking	B-2 General Business	5.6
5831 & 5873 Division Ave S	Commercial; Open Space	FBC-CE Corridor Edge	10.5
901 60th Street SW	Commercial; Open Space	R-1 Residential	12.5
1364 52nd Street SW & 1271 56th Street SW	Open Space	R-1 Residential	50
4860-5190 Byron Center Avenue SW & 2180 52nd Street SW	Golf Course; Commercial; Open Space	R-1 Residential; B-1 Local Business	130
4848 Ivanrest Avenue SW	Open Space	R-1 Residential	7.6
5390-5500 Ivanrest Avenue SW	Driving Range; Residential	R-1 Residential	38
5555 Ivanrest Avenue SW	Golf Course	ER Estate Residential	69
3738-3988 52nd Street SW & 5250-5392 Wilson Avenue SW	Residential; Open Space	ER Estate Residential	75
4300 52nd Street SW	Residential; Open Space	ER Estate Residential	21
4111-4022 64th Street SW	Open Space	O-1 Restricted Office; B-2 General Business	63

Source: City of Wyoming; Houseal Lavigne Associates

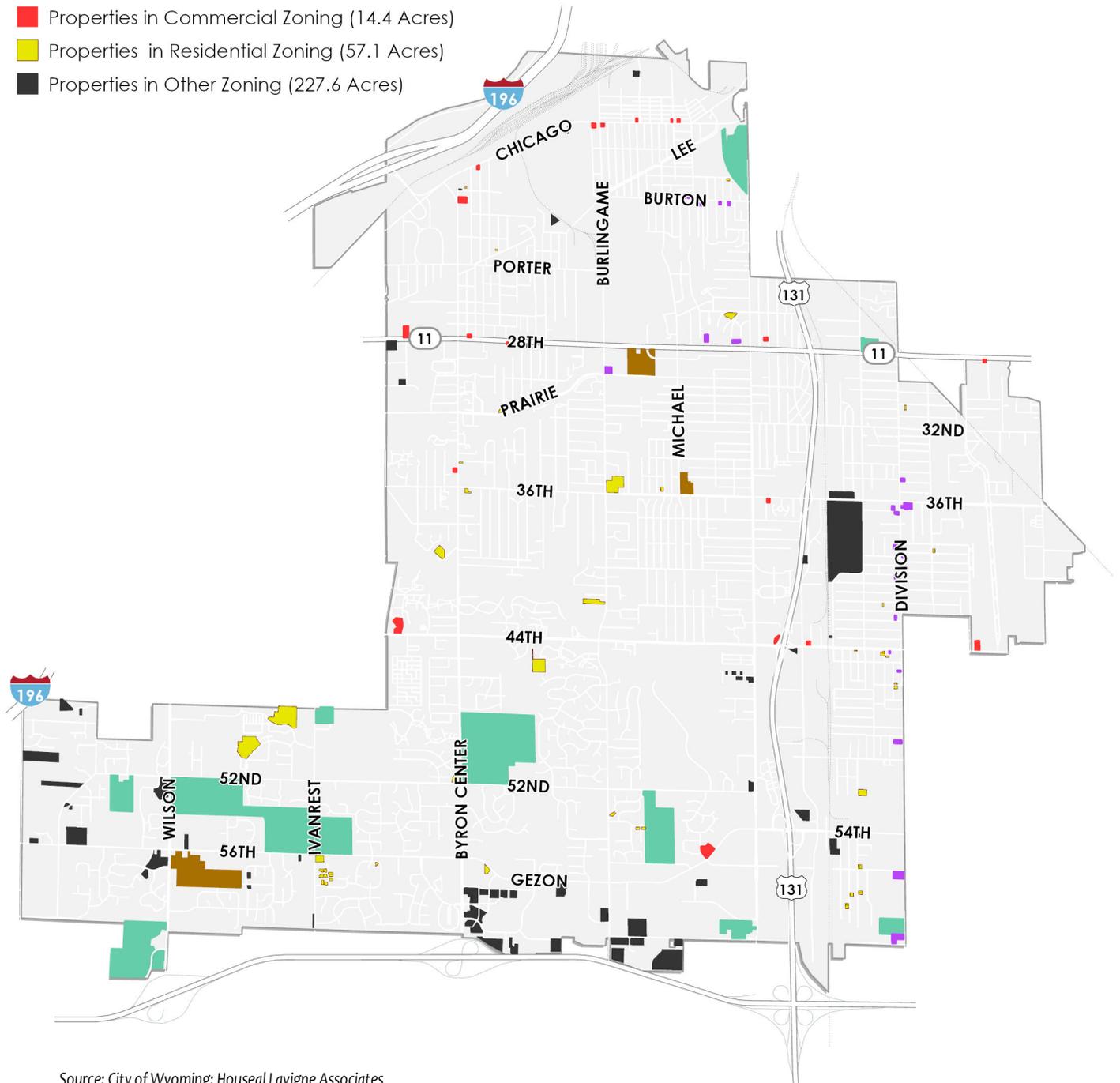
Table 12-25. Potential Development Capacity of Redevelopment Opportunity Sites, Wyoming, 2019

	Acres	Development Capacity		
		5 d.u. per Acre	10 d.u. per Acre	15 d.u. per Acre
Redevelopment Opportunity Sites	514.2	2,571	5,142	7,713

Source: Houseal Lavigne Associates

Figure 12-7. Vacant or Underutilized Properties

- Proposed Development (76.5 Acres)
- Opportunity Sites (513.2 Acres)
- Properties in FBC Zoning (13.3 Acres)
- Properties in Commercial Zoning (14.4 Acres)
- Properties in Residential Zoning (57.1 Acres)
- Properties in Other Zoning (227.6 Acres)



Source: City of Wyoming; Houseal Lavigne Associates

Conclusion

The Grand Rapids-Wyoming MSA is vibrant and growing and, as the second largest community in the region, Wyoming has significant potential to capture this growth. Based on projections from the Grand Valley Metropolitan Council, Wyoming has the potential to grow by 30% by the year 2045 in terms of total households. New households are projected to earn higher incomes and the proportion of renter household is anticipated to increase. Accounting for proposed development (and future vacancy rate of five percent), there is an overall potential need of 7,876 new housing units through 2045.

The preceding analysis documented housing need within the existing housing stock based on current household incomes, highlighting the need for a more balanced housing stock that provides additional rental opportunities for lower income households, and greater housing diversity that better meets future housing demand among middle- and upper income households. A city-wide approach is needed to identify strategies to increase development capacity and physically capture potential housing demand. The City should also evaluate policies to address housing needs for low- and extremely low-income households, as market-rate development will not address gaps within the existing housing stock to meet the needs of these households.

As greenfield opportunities are increasingly limited and vacant infill sites are few, the City's ability to capture projected growth hinges on the ability to shift the local development pattern. This will include accommodating increased density and a more varied housing stock on remaining vacant sites than what has historically been accommodated in Wyoming. The City will also need to turn to the redevelopment of underutilized sites (where existing development is minimal compared to potential development capacity related to surrounding development) and repositioning of sites previously used for non-residential purposes. This will require flexibility in the development process that accommodates a greater range of housing types, including a higher proportion of multi-family housing product. As a built-out community, context-sensitive design approaches will be needed to facilitate successful redevelopment that enhances the overall character of the community.

The City's Form Based Code (FBC) ordinance represents a tool that has yet to be fully leveraged in the community and could provide for the housing variety and quality design needed for many of the vacant and underutilized opportunity sites identified in this report. The recently approved HÔM Flats at 28 West development is an example of a strategic infill redevelopment that leverages the FBC to accommodate more dense development in manner that is sensitive to surrounding contexts. Outside of the FBC zoning districts, development mechanisms such as Planned Unit Development (PUD) process will play a vital role in guiding context-sensitive development that provides a greater number of housing units and mix of housing products that enhance the City's ability to capture regional housing demands.

The growth projected to occur in the region presents not only a land use challenge to the City, but also a housing and economic development opportunity. If the City does not prioritize strategies to accommodate housing needs, potential future households will move elsewhere in the region to find the housing they want and need.

Section A: Appendix

The Appendix contains additional data tables related to the Analysis of Impediments to Fair Housing Choice and the housing needs assessment. The data contained in these tables was evaluated as part of the analysis and is referenced in the report. The Appendix included the following tables:

- **Table A-1.** Applications & Action Taken By Applicant Race MSA, Kent County, Wyoming, 2011-2014-2017
- **Table A-2.** Same by Hispanic Origin, MSA, Kent County, Wyoming, 2011-2014-2017
- **Table A-3.** Aggregate Disposition of 2017 Loan Applications by Property Location, Purpose, Type of Loan and Action Taken
- **Tables A-4 A-E.** MSA Conventional Home Purchase Applications by median income group by Race and Hispanic Origin, 2017
- **Excerpt A-5.** Role of Private Fair Housing Centers
- **Attachment A-6.** Wyoming [re]Imagined Master Plan Community Workshop Summary May 2, 2019
- **Attachment A-7.** Wyoming [re]Imagined Steering Committee Meeting April 23, 2019
- **Attachment A-7.** List of Organizations Interviewed in Analysis of Impediments Process

Table A-1. Applications & Action Taken By Applicant Race MSA, Kent County, Wyoming, 2011-2014-2017

	2011			2014			2017		
	MSA	Kent	Wyoming	MSA	Kent	Wyoming	MSA	Kent	Wyoming
Application approved but not accepted									
White	11,817	792	78	8,526	558	57	9,156	720	60
Black /African American	585	23	1	579	29	1	723	45	6
Asian	490	17	2	281	14	2	264	9	1
Amer Indian/Alaska Native	79	5	0	80	4	1	84	4	1
Native Hawaiian/P. Islander	25	2	0	19	1	0	20	0	0
Info not provided	1,472	85	7	1,218	77	4	1,778	201	25
Application denied by financial institution									
White	54,371	3,570	399	46,849	2,866	350	44,875	2,450	310
Black/African American	4,693	168	13	5,487	230	27	6,173	240	19
Asian	1,549	96	3	1,317	97	12	1,236	84	8
Amer Indian/Alaska Native	422	21	13	536	17	4	640	29	4
Native Hawaiian/P. Islander	104	7	0	118	15	5	154	10	1
Info not provided	7,932	549	53	8,716	475	41	11,895	625	91
Application withdrawn by applicant									
White	21,523	1,617	155	22,993	1,749	177	35,145	2,341	289
Black/ African American	1,197	66	4	1,615	79	7	2,880	145	25
Asian	711	36	3	631	36	5	1,134	81	2
Amer Indian/Alaska Native	105	8	0	185	0	3	366	21	6
Native Hawaiian/P. Islander	47	2	0	51	3	0	83	6	1
Info not provided	3,289	265	23	3,684	322	28	6,926	471	54
File closed for incompleteness									
White	9,106	728	56	9,975	723	68	14,590	779	85
Black or African American	440	32	2	823	49	5	1,420	67	4
Asian	313	20	3	338	8	1	627	20	4
Amer Indian/Alaska Native	68	2	0	88	3	1	188	8	1
Native Hawaiian/P. Islander	22	2	0	19	1	0	48	4	0
Info not provided	2,248	205	16	2,008	175	15	3,261	158	16
Loan originated									
White	168,347	14,372	1,348	162,581	12,855	1,345	195,626	14,977	1,726
Black/African American	5,681	323	32	7,416	408	53	10,549	619	107
Asian	5,487	283	32	4,882	256	31	6,374	378	43
Amer Indian/Alaska Native	575	30	2	826	42	3	1,125	53	8
Native Hawaiian/P. Islander	251	24	7	287	30	4	348	18	3
Info not provided	15,046	1,121	99	16,802	1,317	131	25,974	2,120	249

Table A-2. Same by Hispanic Origin, MSA, Kent County, Wyoming, 2011-2014-2017

	2011			2014			2017		
	MSA	Kent	Wyoming	MSA	Kent	Wyoming	MSA	Kent	Wyoming
Application approved but not accepted									
Hispanic or Latino	297	37	12	253	36	10	322	43	6
Non-Hispanic or Latino	12,763	808	72	8,857	521	52	10,190	748	62
No Info	1,408	79	4	1,593	126	3	1,513	188	25
Application Denied by Financial Institution									
Hispanic or Latino	1705	247	82	1841	248	74	2108	264	77
Non-Hispanic or Latino	59,434	3,636	357	52,400	2,970	330	50,673	2,550	83
No Info	7,931	528	42	8,780	482	35	12,192	624	273
Application withdrawn by applicant									
Hispanic or Latino	527	56	18	670	91	31	1222	147	51
Non-Hispanic or Latino	23,300	1686	146	24,973	1,800	168	38,569	2,487	51
No Info	3,045	252	21	3,516	311	21	6,743	431	275
File closed for incompleteness									
Hispanic or Latino	247	33	8	355	41	16	591	65	20
Non-Hispanic or Latino	9,644	750	56	10,867	726	59	16,044	792	77
No Info	2,306	206	13	2,028	192	15	3,499	179	13
Loan originated									
Hispanic or Latino	3164	379	113	3977	488	160	5,832	707	261
Non-Hispanic or Latino	177,994	14,716	1,319	171,820	12,989	1,280	208,472	15,373	1641
No Info	14,208	1,058	88	16,994	1,430	127	25,692	2,085	234

Table A-3. Aggregate Disposition of 2017 Loan Applications by Property Location, Purpose, Type of Loan and Action Taken

	A+B. Home Purchase Loans				C. Refinancings		D. Home Improvement		E. Loans Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D	
	A. Gov't.		B. Conventional											
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
Grand Rapids-Wyoming MSA 46,023 apps 7,058,898,000*	5,585	\$868,178	19111	\$3,424,233	16616	\$2,438,498	4708	\$327,216	8	\$1,985	2,455	\$342,656	2,528	\$116,261
LOANS ORIGINATED	3,794	\$599,270	13,830	\$2,634,046	9,602	\$1,429,092	2,985	\$206,909	6	\$1,772	1,581	\$234,963	934	\$54,426
APPS APPROVED, NOT ACCEPTED	138	\$19,849	726	\$104,149	510	\$77,928	250	\$13,524	1	\$188	92	\$13,774	266	\$10,013
APPS DENIED	530	\$76,324	1680	\$172,229	2,645	\$374,044	923	\$45,481	0	\$0	313	\$33,595	1,002	\$32,284
APPS WITHDRAWN	619	\$96,296	1712	\$320,509	2,349	\$345,883	376	\$43,152	0	\$0	307	\$40,077	123	\$9,562
FILES CLOSED FOR INCOMPLETENESS	103	\$15,887	380	\$45,663	974	\$135,452	128	\$11,980	1	\$25	76	\$8,776	190	\$8,679
Kent County 17,204 apps \$2,995,724,000*	3,471	\$506,693	13,143	\$1,931,451	16,614	\$2,438,144	4,708	\$327,216	8	1,985	1,539	\$184,414	1,067	\$44,600
LOANS ORIGINATED	2,542	\$387,350	7629	\$1,421,740	6,363	\$949,682	1,757	\$130,405	6	\$1,772	952	\$118,009	598	\$40,743
APPS APPROVED, NOT ACCEPTED	129	\$17,843	412	\$70,834	308	\$45,406	92	\$8,084	0	\$0	63	\$7,982	39	\$1,517
APPS DENIED	458	\$67,277	1418	\$247,670	1,204	\$171,706	309	\$18,611	0	\$0	207	\$22,452	132	\$5,828
APPS WITHDRAWN	436	\$68,200	1329	\$231,749	1,112	\$168,526	309	\$21,247	0	\$0	206	\$23,402	126	\$7,729

FILES CLOSED FOR INCOMPLETENESS	138	\$21,314	398	\$72,141	345	\$49,043	80	\$5,123	1	\$25	44	\$4,455	36	\$1,628
Wyoming	720	\$93,275	1095	\$141,977	1178	\$127,813	320	\$14,966	1	\$330	111	\$10,810	68	\$1,853
3,314 apps														
\$378,361,000*														
LOANS ORIGINATED	483	\$63,999	813	\$112,062	649	\$69,163	190	\$10,497	1	\$330	67	\$7,126	16	\$486
APPS APPROVED, NOT ACCEPTED	20	\$2,530	30	\$3,670	26	\$3,174	17	\$282	0	\$0	3	\$294	0	\$0
APPS DENIED	62	\$7,119	91	\$5,381	199	\$22,353	81	\$2,332	0	\$0	15	\$861	48	\$1,235
APPS WITHDRAWN	81	\$9,778	99	\$12,752	180	\$19,357	17	\$982	0	\$0	21	\$2,143	0	\$0
FILES CLOSED FOR INCOMPLETENESS	16	\$2,321	15	\$1,749	70	\$7,762	9	\$450	0	\$0	2	\$174	4	\$132

* Area totals exceed sum of actions taken due to loans purchased by institution category not reported

Source: Consumer Financial Protection Bureau GR-WYO MSA LAR file, 2017

Table A-4 A. MSA Conventional Home Purchase Apps Less than 50% of MSA/MD median income by Race and Hispanic Origin, 2017

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's
Less than 50% of MSA/MD median												
Race												
American Indian/Alaska Native	8	512	5	391	0	0	2	71	1	50	0	0
Asian	49	5,251	28	3,549	3	123	11	608	4	608	3	363
Black or African American	62	4,352	31	2,685	2	34	24	1,095	3	429	2	109
Native Hawaiian or Other Pacific Islander	5	333	1	118	0	0	4	215	0	0	0	0
White	1454	104,339	780	69,447	80	4,137	439	18,436	115	10,470	40	1,849
2 or more minority races	4	351	2	219	0	0	1	30	1	102	0	0
Joint (White/Minority Race)	16	803	5	343	0	0	7	152	1	120	3	188
Race Not Available	156	12,330	70	6,516	10	833	45	2,197	21	2,019	10	765
Ethnicity												
Hispanic or Latino	156	11811	77	7443	7	467	52	2,014	17	1,740	3	147
Not Hispanic or Latino	1429	104,596	782	70,026	77	3,758	415	17,954	114	10,443	41	2,415
Joint (Hispanic or Latino/Not Hispanic or Latino)	5	281	1	26	0	0	3	23	1	232	0	0
Ethnicity not available	164	11,583	62	5,773	11	902	63	2,813	14	1,383	14	712
Minority Status												
White Non-Hispanic	1287	92,349	711	62,643	71	3,541	374	15,782	101	8,979	30	1,404
Others, Including Hispanic	8	348	2	175	0	0	5	123	1	50	0	0

Table A-4 B. MSA Conventional Home Purchase Apps 50% to 79% of MSA/MD median income by Race and Hispanic Origin, 2017

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's
50-79% of MSA/MD median												
Race												
American Indian/Alaska Native	15	981	6	523	1	1	3	226	2	162	3	69
Asian	100	13,597	68	9,841	2	300	16	1,614	13	1,642	1	200
Black or African American	82	8,451	50	5,847	6	594	15	840	7	1,009	4	161
Native Hawaiian or Other Pacific Islander	4	406	4	406	0	0	0	0	0	0	0	0
White	3559	399,299	2,615	318,579	183	12,718	376	24,773	280	35,788	105	7,441
2 or more minority races	3	114	1	40	0	0	2	74	0	0	0	0
Joint (White/Minority Race)	40	2,655	22	2,199	4	68	12	344	0	0	2	44
Race Not Available	373	44,423	255	32,221	15	1,621	47	3,987	45	6,037	11	557
Ethnicity												
Hispanic or Latino	232	21,114	145	15,494	25	1,437	40	2,171	14	1581	8	431
Not Hispanic or Latino	3,502	400,382	2,603	319,907	169	11,997	371	25,573	282	36,358	77	6,547
Joint (Hispanic or Latino/Not Hispanic or Latino)	43	3,432	22	2,437	3	31	9	293	4	539	5	132
Ethnicity not available	401	45,092	252	31,840	14	1,837	51	3,821	48	6,232	36	1,362
Minority Status												
White Non-Hispanic	3,298	375,437	2,468	302,523	161	11,103	338	22,559	258	33,191	73	6,061
Others, Including Hispanic	4	390	2	346	0	0	0	0	0	0	2	44

Table A-4 C. MSA Conventional Home Purchase Apps 80%-99% of MSA/MD median income by Race and Hispanic Origin, 2017

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's
80-99% of MSA/MD median												
Race												
American Indian/Alaska Native	3	528	2	476	0	0	0	0	0	0	1	52
Asian	59	9,979	45	7,669	1	205	5	779	8	1,326	0	0
Black or African American	38	4,902	32	4,439	2	2	2	77	0	0	2	384
Native Hawaiian or Other Pacific Islander	1	157	1	157	0	0	0	0	0	0	0	0
White	2024	28,349	1588	238,019	81	8,252	128	1,1731	192	27,795	35	3,552
2 or more minority races	0	0	0	0	0	0	0	0	0	0	0	0
Joint (White/Minority Race)	30	3,308	22	2,687	1	228	3	84	2	227	2	82
Race Not Available	277	40678	191	28,360	10	1,923	32	4,249	32	4,898	12	1,248
Ethnicity												
Hispanic or Latino	106	11,903	64	8,129	7	445	21	1,347	11	1,704	3	278
Not Hispanic or Latino	2,039	296,322	1617	24,4573	79	8,559	117	11,512	191	27,826	35	3,852
Joint (Hispanic or Latino/Not Hispanic or Latino)	20	2,005	15	1,777	1	1	3	94	1	133	0	0
Ethnicity not available	269	38,857	186	27,498	8	1,605	29	3,967	31	4,583	15	1,204
Minority Status												
White Non-Hispanic	1927	278,643	1528	230,423	75	8,047	113	10,620	182	26,356	29	3,197
Others, Including Hispanic	5	603	2	323	0	0	2	147	1	133	0	0

Table A-4 D. MSA Conventional Home Purchase Apps 100% to 120% of MSA/MD median income by Race and Hispanic Origin, 2017

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's
100-119% of MSA/MD median												
Race												
American Indian/Alaska Native	2	202	1	150	0	0	1	52	0	0	0	0
Asian	31	5,454	25	4,615	1	76	3	330	2	433	0	0
Black or African American	28	3,594	17	2,633	3	348	2	27	4	541	2	45
Native Hawaiian or Other Pacific Islander	2	370	0	0	0	0	1	143	1	227	0	0
White	1,609	264,323	1,323	220,497	49	7,170	70	9,314	146	24,462	21	2,880
2 or more minority races	0	0	0	0	0	0	0	0	0	0	0	0
Joint (White/Minority Race)	29	4,612	22	4,044	2	167	3	202	2	199	0	0
Race Not Available	175	30,004	133	22,755	7	1,447	6	1,076	25	3,968	4	758
Ethnicity												
Hispanic or Latino	35	4,206	27	3,433	4	464	1	47	3	262	0	0
Not Hispanic or Latino	1,643	271,973	1,349	226,652	52	7,511	75	9,850	149	25,338	18	2,622
Joint (Hispanic or Latino/Not Hispanic or Latino)	23	2,857	16	2,205	0	0	2	99	4	407	1	146
Ethnicity not available	176	29,670	130	22,551	6	1,233	8	1,148	24	3,823	8	915
Minority Status												
White Non-Hispanic	1,570	260,366	1,296	217,140	47	7,086	67	9,267	142	24,113	18	2,760
Others, Including Hispanic	0	0	0	0	0	0	0	0	0	0	0	0

Table A-4 E. MSA Conventional Home Purchase Apps 120% or more of MSA/MD median income by Race and Hispanic Origin, 2017

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's
120% or more of MSA/MD median												
												Race
American Indian/Alaska Native	10	2,264	4	1,083	1	153	2	381	3	647	0	0
Asian	153	39,375	113	28,905	2	331	9	2,594	27	7,013	2	532
Black or African American	75	14,909	54	10,909	5	742	4	725	9	1,777	3	756
Native Hawaiian or Other Pacific Islander	1	126	1	126	0	0	0	0	0	0	0	0
White	6560	1661,646	5363	1,369,189	222	54,092	268	62,824	616	155,135	91	20,406
2 or more minority races	1	380	1	380	0	0	0	0	0	0	0	0
Joint (White/Minority Race)	111	27,094	91	22,533	0	0	8	1,179	10	2,829	2	553
Race Not Available	842	221,651	649	170,689	32	8,931	44	13,463	106	26,522	11	2,046
												Ethnicity
Hispanic or Latino	114	25,509	86	19,392	5	731	7	1,251	12	3,331	4	804
Not Hispanic or Latino	6685	1,697,597	5460	1,394,765	220	53,476	273	65,945	642	162,767	90	20,644
Joint (Hispanic or Latino/Not Hispanic or Latino)	102	23,292	72	16,089	6	1,158	5	800	16	4,390	3	855
Ethnicity not available	853	221,262	658	173,568	31	8,884	50	13,170	101	23,435	13	2,205
												Minority Status
White Non-Hispanic	6414	1,630,094	5263	1,346,404	212	52,367	258	60,919	597	151,359	84	19,045
Others, Including Hispanic	6	955	4	618	0	0	0	0	2	337	0	0

Excerpt A-5. Role of Private Fair Housing Centers

An excerpt from HUD's study of its Fair Housing Initiatives Program (FHIP) notes the role and the effectiveness of private fair housing centers, including FHCWM:

Difference in Outcomes for FHIP-Referred and Non-FHIP-Referred Complaints

Analysis of the cases that FHIP organizations refer to HUD, compared with all other FHIP complaints, found that FHIP grantee organizations play a vital role in screening out complaints that do not reflect fair housing violations and help resolve cases that exhibit evidence of discrimination without referring them to HUD or a FHAP agency. This finding is true for cases in which FHOs are included as a complainant and when they are representing a complainant. When compared with all inquiries referred to HUD, only 10% of FHIP-referred inquiries were found to be not under HUD jurisdiction, while 62% of non-FHIP-referred inquiries were found to be not under HUD jurisdiction.

This finding is consistent with the survey findings that show that FHIP organizations find that 43% of the cases they investigate do not have merit and thus are not referred to HUD or a FHAP agency. When cases were found to be under HUD jurisdiction, the FHIP organization referred the complaints to HUD, particularly those in which the FHIP organization was a complainant. These complaints were more likely to be closed as a cause finding or conciliation than were complaints that originated from other sources. According to data reported in the HUD TEAPOTS database, FHIP-referred complaints accounted for only 10% of the 26,090 cases that HUD closed between FY 2003 and FY 2005, but 31% of the FHIP-referred cases closed because of a cause finding (19%) or conciliation (12%). Of the complaints in which FHIP organizations were a complainant (4%), 71% closed as a conciliation or cause finding, compared with 43% of cases in which FHIP organizations acted as a representative to the complainant, and 37% of non-FHIP-referred complaints.

Better outcomes are found for FHIP-investigated cases, particularly those cases in which the FHIP organization is a listed complainant, and may be related to testing conducted by FHIP organizations. Of the 542 cases with testing reported as part of the case, 72% of the tests were done on cases in which a FHIP organization was the complainant (about 42% of all cases in which a FHIP organization was a listed complainant had testing) and 13% when the FHIP organization was a representative (about 4.5% of all cases in which a FHIP organization was a representative). Only 15% of all cases with testing did not appear to involve a FHIP organization (only 0.4% of all non-FHIP-referred cases had testing). Testing substantially improves the probability of a case being caused or conciliated, with 69% of cases with testing ending in a cause or conciliation, compared with 38% of cases without testing.

Conclusions

This study presents four major findings: (1) FHIP grantee organizations act as a filter, and FHIP-referred complaints are much more likely to result in a cause finding or conciliation than are other sources; (2) complaints in which FHIP organizations are a complainant are more likely to be closed as a conciliation or cause finding compared with complaints in which FHIP organizations act as a representative to the complainant and non-FHIP-referred complaints; (3) FHIP organizations are the primary source for testing evidence associated with complaints and rely heavily on FHIP grants as a stable source of funding for enforcement and testing activities; and (4) FHIP organizations play a particularly important role related to design and construction, familial status, and pattern and practice cases, and these more complex complaints that are referred to HUD may be the reason why FHIP-referred cases may take longer to close than non-FHIP-referred complaints.



Wyoming [re]Imagined Master Plan

Community Workshop Summary

Tuesday, May 2, 2019

On May 2, 2019 at 6:00p.m., the City of Wyoming hosted a Community Workshop at the Wyoming Library as part of the ongoing planning process for the Wyoming [re]Imagined Master Plan. Approximately 40 community members attended who provided feedback on strengths, issues, and opportunities within Wyoming; improvements they would like to see undertaken; and their long-term vision for the community.

After a presentation to review the planning process and the purpose of the Master Plan, participants were asked to provide input on poster boards located at five stations located throughout the room. Each poster asked a different question about community priorities and facilitators were located at each station to group comments into categories based on topic and summarize key themes. Images of each board are provided at the end of this summary.

Meeting facilitators reported back to the group on key themes and then participants were asked to comment on any aspects of the summary they wished to raise with the group. The input received will be used in preparation for Wyoming [re]Imagined to highlight the existing needs of the community and direct the topics to be addressed by the Master Plan.



Top Issues & Concerns

Housing

The most pressing issue discussed was the need for affordable housing to counteract increasing housing costs. Multiple participants shared the need for affordable owner-occupied homes for all income levels. The need for additional mixed use apartments to meet housing demand was also identified with some participants noting that many single family homes are being rented. Other items discussed included issues with property maintenance related to absentee property owners, the concentration of rental properties in certain areas, the need for stricter rental code enforcement, and the need for additional senior housing and community centers in response to an aging population.

Wyoming, Michigan – Analysis of Impediments to Housing Choice & Housing Needs Assessment

Prepared by Houseal Lavigne and Lee Nelson Weber

DRAFT

Review Only

Economic Development

Site 36

The redevelopment of Site 36, a 92-acre brownfield site, was a priority identified by several participants. Comments highlighted that the large vacant site fosters community perception that Wyoming is struggling as a community despite consistent positive growth over the last several years. Ideas of how to best to utilize the site varied widely, including constructing a community or convention center, attracting a new industrial user, and developing an urban forest. Regardless of use, comments underscored redeveloping the large size of Site 36 and the likely need to divide and repurpose different portions of the site for different uses.

Downtown

Another popular topic was the desire for a pedestrian-friendly downtown and mixed use neighborhood centers to better serve local residents. Participants frequently cited the need to fill vacant lots and businesses within Wyoming, with specific examples identified along Division Avenue and 28th Street. This also included discussion of Rogers Plaza Town Center and surrounding properties as opportunities for new investment that could revitalize the aging retail area and serve as the location of activity-generating uses such as a food truck park, community center, or farmer's market.

Mobility & Transportation

Worsening traffic congestion, particularly along US 131 and 54th Street, was a common concern. Participants also expressed the desire to lower traffic speeds and to install additional signalized crossings along 28th Street to strengthen pedestrian safety and comfort. One participant wished to see less space devoted to underutilized parking lots to establish an urban setting supportive of public transportation, and recommended the use of reflective paving material to reduce heat retention.

There was a strong desire among participants to increase walkability in neighborhoods and provide better bicycle and pedestrian infrastructure, including a more integrated and complete network of bike paths and pedestrian trails. Participants specifically highlighted the need for better east-west connections to the Kent Trails (including from Lemery Park) and an improved bicycle path to travel across the US 131 and M-6 corridors.



Outdoor Recreation & Natural Environment

While the participants highlighted the parks network as one of the key assets of Wyoming, participants also voiced the need for more parks, community and shared gardens, and improved landscaping. Comments indicated a desire that all residents should be within walking distance to a park and developers should be incentivized to preserve existing trees or plant new trees. Additionally, participants asked that more natural landscaping and greenspace be created in the community and for mowed lawns to be replaced with such.

City Government & Services

Participants wished for Wyoming's leaders to be less timid or cautious about taking on bold actions for the community. Another concern among participants was a perceived lack of diversity amongst City leaders and staff, which does not reflect the demographics of Wyoming's population. Some participants expressed the desire for a more responsive Police Department and the need to hire more police. In discussing public safety, some comments underscored a need for businesses and residents to work together with the Police Department to keep Wyoming a safe place to live.

Employment & Education

Several participants identified a perceived lack of local economic opportunities and jobs with sufficient benefits and livable wages as a major issue. Discussion also highlighted an increasing cost of living and number of households facing food insecurity. Comments indicated a desire for more year-round education options, mentoring, and job shadowing opportunities for youth, and vocational/trades education for adults and youth to prepare residents for middle-skill jobs.

Specific Actions & Projects

Participants indicated specific projects or actions they would like to be seen undertaken as follows:

Mobility & Transportation

- Develop a connected bike and pedestrian path network and make Wyoming a walkable community (3)
- Increase public transportation
- Alleviate traffic congestion
- Reduce speed limits
- Add more electric vehicle charging stations
- Plow the cul-de-sacs

Outdoor Recreation & Natural Environment

- Develop more outdoor community gathering spaces (2)
- Build an Environment and Nature Education Center, such as at Buck Creek (2)
- Improve Buck Creek as a public outdoor amenity
- Update Lamar Park with a playground
- Create community gardens

Education

- Improve schools funding for public education (3)
- Improve before/after school programs (2)
- Provide an adult mentor for every child in our schools

Identity & Image

- Build City pride through beautification
- Keep the small-town feeling
- Strengthen community identity at a neighborhood level instead of dividing the community by School Districts

Employment

- Improve job training opportunities, including skilled trade schools (3)
- Increase quality industrial employment opportunities
- Increase higher paying jobs

City Government

- Staff more public safety officers
- Enforce the zoning ordinance

Development

- Develop Site 36 (7)
- Build 1,000 one-bedroom apartments with rents under \$500/month
- Encourage and fund senior centers to serve a growing senior population
- Improve the Division Avenue business district
- Plowed sidewalks and road maintenance

Primary Strengths & Assets

Participants identified the following as the main strengths and assets of Wyoming:

- Diversity of people and cultures
- Down to earth neighbors
- Small-town feel
- Public housing
- Affordable housing
- Wyoming Housing Commission
- Senior Centers and senior living opportunities
- Parks, green space, and recreation
- Buck Creek Nature Preserve
- Lamar Park
- The Wyoming Library
- Partnerships between the community and businesses
- The shops
- Location near Grand Rapids
- Accessibility to highways
- Numerous churches
- Blue collar culture and working-class people
- Approachable City government and friendly staff at City Hall
- The neighborhoods
- Sense of safety
- Wyoming Public Safety Department
- Public Works and City services





Wyoming [re]Imagined Master Plan

Steering Committee Orientation & Initiation Meeting Summary

Tuesday, April 23, 2019

On April 24, 2019, the City of Wyoming hosted a Steering Committee Meeting located at the Wyoming Library at 6:00 p.m. The 20-member Steering Committee includes individuals from a diverse range of backgrounds and connections to the community including members from the School Districts, Parks and Recreation Commission, residents, business stakeholders, representatives from partner agencies, such as MDOT and Metro Health, City Council, and Planning Commission. The group will advise, review, and provide feedback throughout the master plan process.

The purpose of the meeting was to review the planning process and solicit input on pressing issues and concerns facing the City, specific projects Steering Committee members would like to see undertaken, and the primary strengths and assets of the community. Through discussion of each topic, strong agreement between the top issues and strengths of Wyoming were revealed, which have been summarized below. The feedback received will be used in the preparation for Wyoming [re]Imagined, the City's new Master Plan, to guide the topics to be addressed in the plan and highlight the existing needs of the community.



Issues & Concerns

Housing Stock

The lack of quality affordable and accessible housing was the top issue identified by the Steering Committee members. Comments highlighted a need for workforce housing that is affordable to low- and middle-income wage earners that would allow them to live close to their jobs. In addition, Steering Committee members discussed a need for senior housing and to maintain the overall quality of Wyoming's existing housing stock .

Image & Identity

Many Steering Committee comments also centered on the questions like “Who are we?” and, “What is our Identity?” Members voiced that Wyoming lacks a strong identity and a story to tell about the culture and people of the community. This was connected to the need to improve the outside perception of the City as well as unify neighborhoods and eliminate notions of north versus south.

While schools are viewed as a strength within the community overall, the presence of seven school districts was also identified as a dividing factor within the community with residents identifying themselves by school district rather than as Wyoming residents.

Poor or weak image by outsiders was also highlighted when discussing identify. Comments identified a need to promote the City as an attractive destination and pointed to a lack of a destination or defining feature that distinguishes Wyoming. Related to these elements, Steering Committee members expressed the wish for placemaking and the beautification of the City.

Also related to community identify was the issue of community diversity. Steering Committee members identified Wyoming's diverse population as a key strength, but emphasized a need for further engagement to ensure community participation is representative of the City's demographics. This was also extended to a desire to see broader community representation and increased diversity within City government as well as in the employee makeup of corporate citizens and partner organizations.

Land Use & Development

Another major issue was the vacant and underutilized commercial and industrial sites within Wyoming, including along 28th Street and Division Avenue, and at Site 36. This coincides with the indicated need to sustain economic activity and development while promoting smart growth principles. Smart growth was also discussed in terms of cultivating a Downtown, a city feature residents continue to wish for, to create a gathering place as well as an urban anchor for planning. Steering Committee members also wished to encourage and incentivize mixed-used development within Wyoming, improve its aged built environment, particularly in the north, and promote density within future growth plans.

Economy & Employment

Revitalizing the local economy and increasing employment opportunities were highlighted as key concerns. Steering Committee members voiced the need for equity in hiring for middle-skill and high-wage jobs, increased promotion of available job opportunities, and ensuring employment diversity. Members also expressed concern for the loss of manufacturing (such as at Site 36) and traditional retail in certain areas (such as Rogers Plaza and 28th Street). Improving the role of neighborhood business districts in attracting new businesses was also mentioned as an issue.

Transportation & Connectivity

Traffic patterns and maintenance of roadway infrastructure in relation to growth and congestion were identified as concerns. Steering Committee members hoped for the expansion of a low-cost transportation system including transit while creating a balance between pedestrians, bicyclists, and vehicles within Wyoming. The need for a complete bike trail system, better walkability in commercial areas, and improved connectivity between neighborhoods were also highlighted.

Services & Amenities

The Steering Committee discussed the need to improve existing community services and amenities as well as create new services to enhance residents' living experience within Wyoming. This includes providing equal and diverse school opportunities, affordable quality childcare options, and a community resource portal for residents to network. The group also shared the desire to increase family financial literacy through adult education and workshops as well as to create a robust local food system that is green, nutritious, fair, affordable, and accessible. Preserving Wyoming's robust public park system, strengthening the arts within the community, and maintaining quality public works and public safety services were other desires identified.



Specific Projects & Actions

Steering Committee members indicated specific projects or actions they would like to see occur in Wyoming as follows:

Housing

- Develop affordable and quality housing for residents that represent a mix of socioeconomic statuses, cultures, and ethnicities.

Image & Identity

- Tackle the identity issue as a community-wide initiative.
- Brand the City by developing a local and outside image of who and what Wyoming is.
- Make Wyoming beautiful.
- Celebrate rather than criticize the City's identity, such as through community events.
- Unify the City. "Create one Wyoming."
- Create a pilot project that integrates the best planning principles and celebrates the community, such as mixed income, mixed use, and placemaking.
- Create a task force to celebrate diversity in business, residents, art, and education.
- Promote investment and create incentives to improve and maintain quality rental properties.
- Incorporating tree canopy as a component of the City's culture and community art as storytelling.
- Conduct a diversity analysis to "define, dissect, and discover" about businesses, elected officials, school officials, and the population.
- Form a business façade improvement program for commercial and retail corridors that create safety through design.
- Connect neighborhoods while cultivating their unique identities.
- Give bigger voices to citizens to represent the diversity.
- Make neighborhood districts destinations by leveraging existing tools of the community.

Economy & Employment

- Create specialized training opportunities for those entering the workforce, such as apprenticeships.
- Attract a new industry to Site 36 as a major employment opportunity.
- Attract a retail anchor store to the old Studio 28 site.
- Bring in jobs which will build schools and housing.
- Develop a downtown business district.

Land Use & Development

- Develop ways to incentivize the redevelopment of major commercial corridors, industrial areas, and residential neighborhoods.
- Create a pilot project that demonstrates best practices for development along Division Avenue and 28th Street.
- Develop a Civic Center on 28th Street to serve as a community gathering place.
- Revitalize 28th Street between Burlingame and Clyde Park avenues.
- Create unique neighborhood identities and hubs for gathering spaces (e.g., redevelopment of Division Avenue and Burton Street).
- Develop mixed use, walkable, and sustainable developments, including affordable housing.
- Redevelop underutilized and vacant properties.
- Create a city center.
- Develop industrial uses along Grand River and give residents access to waterfront.
- Be open to different types of land use types.
- Incentivize and invest in mixed use developments for urban farming and local produce entrepreneurship.

Transportation & Connectivity

- Preserve or rehabilitate existing streets, bridges, and public utilities.
- Park improvements with bike paths and connectivity between neighborhoods.
- Improve neighborhood connectivity by providing pedestrian and bike paths along corridors that connect activity centers and community assets.

Services & Amenities

- Improve parks and provide bike path connectivity between them.
- Merge all seven School Districts or redefine the borders.
- Improve school system.
- Perform health equity assessment and programming.
- Create grants available to families for childcare options and for training programs for staff of the facilities.
- Build water parks.
- Develop cultural centers.
- Improve outreach and community engagement for citizens.
- Increase awareness of community organizations and resources that are available to residents.

Strengths & Assets

Steering Committee members identified the following as the main strengths and assets of Wyoming (repeated comments have been marked with their frequency):

- Diversity. (10)
- The people. (6)
- Accessible and diverse park and recreation system. (5)
- Public works and services. (4)
- Location. (3)
- UM/Metro Health for health care access. (3)
- Potential, such as for parks, public spaces, people, public safety, places, and properties. (2)
- Proximity to Grand Rapids as a first-tier suburb. (2)
- Knowledgeable and enthusiastic staff. (2)
- Public safety. (2)
- New developments.
- A community that is committed to improvement.
- Vacant land available for redevelopment and job creation.
- Developers that work hard to attain affordable housing.
- New development to the South and aged areas to the north that can be leveraged for future growth.
- Shoreline of Lake Michigan.
- The urban, residential, and rural identity that should be celebrated.
- No areas of significant blight.
- Hope.
- Size.
- Residents who are "all-in" - born, raised, and no plans to leave.
- Community member's grit.
- Diverse businesses and neighborhoods.
- Multigenerational community.
- Room for everyone.
- Neighborhood areas.
- Surrounded by other communities that we use to our advantage.
- Water system.
- Stewardship.
- Roads.
- Police and fire services.
- Proactive government.
- High quality School Districts.
- Parks and recreation events.
- Restaurants.
- Community events.
- Marge's Donut Den.
- Senior center.

Attachment A-8. List of Organizations Interviewed in Analysis of Impediments Process:

- Community Food Club
- Disability Advocates of Kent County
- Dwelling Place
- Fair Housing Center of Greater Grand Rapids
- Genesis Non-profit Housing Corp
- Godfrey Lee Schools
- Godwin Heights Schools
- Grand Rapids Housing Commission
- Greenridge Realty (Kentwood)
- Home Repair Services of Kent County
- ICCF Inner City Christian Federation
- InnovaLab (formerly Kent County Land Bank Authority)
- Keller Williams Realty Rivertown
- Kent County Continuum of Care/Coalition to End Homelessness
- Kent School Services Network
- Legal Aid of West Michigan
- LINC Up
- Mel Trotter Mission
- New Development Corp
- Redstone Homes
- UCOM United Community Outreach Ministry
- Wyoming Housing Commission
- Wyoming Public Schools