

JACKSON

Founded 1829

Community Development Block Grant (CDBG)
HOME Investment Partnerships Program (HOME)

2025–2029 Five–Year Consolidated Plan *and* 2025–2026 Annual Action Plan



Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

Introduction

The City of Jackson is a United States Department of Housing and Urban Development (HUD) entitlement community. As such, the City has been the recipient of Community Development Block Grant (CDBG) funds since 1974 and HOME Investment Partnerships Program (HOME) funds since 1991. Every five years the City of Jackson is required to submit a Consolidated Plan offering an opportunity to shape various housing and community development programs into effective strategies. The Consolidated Plan serves as the application for federal funds under HUD's entitlement programs, provides a course of action in carrying out activities over the next five years, and is the planning document for assessing performance and tracking results. HUD's three statutory goals - decent housing, suitable living environment, and expanded economic opportunities – are key in the development of viable urban communities. Eligible activities are principally targeted toward persons of low- and moderate-income.

This Five-Year Consolidated Plan will cover the time period of July 1, 2025 through June 30, 2029, which is also referred to as Program Years 2020 to 2024. In addition to the Consolidated Plan, the City must complete and submit annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPER).

The Consolidated Plan consists of the following sections:

- *Process* – describes the consultation and citizen participation process used to collect public input for the City's community development and housing needs. Citizens were also provided 30 days to review and comment on this Consolidated Plan and accompanying Annual Action Plan.
- *Needs Assessment* – analyzes the needs related to affordable housing, special needs housing, community development, and homelessness.
- *Market Analysis* – examines demographics, the supply of affordable units and associated housing market, other conditions that impact community development, and the programs designed to address those needs.
- *Strategic Plan* – specifies goals to address the priority needs Jackson will address with the limited resources available.

The Consolidated Plan also includes the first year (2025-2026) Annual Action Plan which describes the planned investment of CDBG and HOME funds to implement specific activities to satisfy overarching strategic goals.

Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Needs Assessment of the Consolidated Plan, in conjunction with information gathered through consultations and the citizen participation process, provides a picture of the City's needs related to affordable housing, special needs housing, community development and homelessness. The Needs Assessment is subdivided as follows:

- *Housing Needs Assessment* - reviews housing needs according to the categories listed in the regulations, including income level, tenure, and household type, and by housing problems, including cost burden, overcrowding, and substandard housing conditions.
- *Disproportionately Greater Need* - a disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.
- *Public Housing* - identifies public housing within the City's boundaries and the needs of public housing residents.
- *Homeless Needs Assessment* - describes the nature and extent of homelessness within the City of Jackson.
- *Non-Homeless Special Needs Assessment* - describes the level of housing need for persons who are not homeless but require supportive housing, including the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, public housing residents, and other similar categories.
- *Non-Housing Community Development Needs* - summarizes the City's priority non-housing community development needs, including the need for public facilities, public improvements, public services, and other eligible uses of CDBG.

The level of need in Jackson is always greater than the limited amount of CDBG and HOME funds received annually. Jackson plans to target resources in the three (3) most distressed areas of the City – West of Henry Ford Allegiance Health, East of S. Martin Luther King Jr. Dr., and West of S. Martin Luther King Jr. Dr. The number of funded activities will remain low in an effort to increase their effectiveness which will include Homeowner Rehabilitation, Public Facilities/Infrastructure Improvements, Code Enforcement, Residential Demolition, Public Services, CHDO Projects (to be determined), and Homebuyer Activities.

Evaluation of past performance

The City of Jackson demonstrated timely and responsible progress in meeting the goals and objectives stated in the 2020 – 2024 Consolidated Plan. Staff ensured compliance with all rules and regulations associated with the respective CDBG and HOME grants. Detailed progress evaluations are available in the yearly Consolidated Annual Performance and Evaluation Reports (CAPER) submitted to HUD and posted on the City's website.

Summary of citizen participation process and consultation process

Citizen participation and stakeholder consultation is an integral part of the Consolidated Plan process. The City's Citizen Participation Plan outlines the procedures and means by which citizens and stakeholders may provide meaningful input.

A Public Hearing to receive citizen input on the housing and community development needs was held during the January 14, 2025 regular City Council meeting. Staff's participation with the Jackson County Continuum of Care (CoC) garnered input from the various public, private, and faith-based organizations focused on low-income housing and homelessness. Staff also solicited input from organizations who serve the low-income community but do not participate in the CoC, such as the Welcome Home Organization. Finally, feedback was obtained during numerous community events (housing workshops, neighborhood outreach events, and ward meetings), and from members of the City of Jackson Affordable Housing Development Board (AHDB).

A draft copy of the Consolidated Plan was received by City Council on March 25, 2025 and made available for public review and comment on March 25, 2025. Citizens were afforded a 30-day period in which to submit oral or written comment about the Consolidated Plan and Annual Action Plan, culminating on April 29, 2025. Citizens are also able to express concerns or comments at any time during the year before City Council meetings or by contacting grant staff.

Summary of public comments

Various Community Events – Community members shared feedback at the Flatiron Block Party (7/13/24), a Housing Meeting at the Welcome Home Organization (7/17/24), a 100 Homes event (8/3/24), the Ward 5 meeting (10/1/24), and the Ward 2 meeting (12/9/24). Staff from the Community Development were present at these events, and suggestions included:

1. Continuation of homeowner rehabilitation assistance
2. Addition of a rehabilitation program for homeowners earning between 80% - 120% of the area median income (AMI)
3. Construction of additional housing for low-moderate income families
4. Utilizing HUD funding to support efforts of the Jackson Housing Commission

Continuum of Care Meeting – Continuum of Care members shared feedback at the online meeting held on 1/7/25, including:

1. Request for assistance in providing homeless supportive services
2. Inquiry regarding ordinance changes to allow for tiny home construction in the City of Jackson
3. Consideration of gap financing by the City using HUD funds to offset anticipated missing federal revenue for nonprofit agencies during the next 5 years
4. Use of funding to support collaborative efforts of local nonprofit agencies
5. Request for Continuum of Care funds to support housing clinics

Affordable Housing Development Board (AHDB) Meeting – AHDB members and one citizen provided feedback at a meeting held on 1/7/25, including:

1. CDBG/HOME funds to assist with permanent supportive housing efforts
2. HOME funds to offer Tenant-Based Rental Assistance (TBRA) or down-payment assistance for single-family new construction projects
3. HUD funds for a “just in case” fund available to landlords to offset costs incurred by tenants causing damage to rental units

Email Communication – One local nonprofit employee requested additional information regarding planned CDBG/HOME projects during FY 2025-2026, in an email sent on 1/7/25.

Public Hearing – Three citizens spoke at the Public Hearing on 1/14/25, and their comments included:

1. Continue the City’s down-payment based 100 Homes Program with additional investments
2. Use CDBG and HOME funds to assist landlords in the maintenance of their properties for low-middle income residents
3. Utilize CDBG funds to cover the costs of mandatory rental inspection fees
4. Utilize HOME funds for affordable housing efforts
5. Request to wisely spend federal funds on housing efforts
6. Comments regarding the efforts of local nonprofit agencies to provide supportive and housing services to homeless individuals and families (unrelated to this 5-year Plan)
7. Unrelated comments regarding design elements of new homes in the City of Jackson

Consolidated Plan/Annual Action Plan 30-day Comment Period – The 30-day comment period ran from March 27 – April 29, 2025. No comments were received.

Summary of comments or views not accepted and the reasons for not accepting them

No comments or views were declined by the Jackson City Council; however, due to various federal rules and regulations, the City is not able to enact certain suggestions. The City already has programs in place to address some of the other suggestions, such as homeowner rehabilitation and payment of special assessments, and notes there are other funding resources available in the community for other suggestions, such as prisoner re-entry.

Summary

The Jackson City Council encourages all citizens to participate in not only the CDBG/HOME planning process, but in all processes of the local government. At the beginning of each City Council meeting, citizens are allowed time to address the Mayor, City Manager, Councilmembers and department heads on matters that concern them. Council meetings are usually held on the second floor of City Hall, which can accommodate persons with disabilities. Meetings are shown live on a local public access television station, JTV, which also replays the meetings at various other times throughout the week.

Oftentimes there simply are not enough resources available to consider implementing every suggestion posed. Other suggestions may not fit the Council’s vision and goals for the City and are taken in abeyance. There have also been several times in which citizen’s comments and suggestions have been executed and helped shape the way the City of Jackson operates. The public is also invited to attend the Jackson Affordable Housing Development Board (AHDB), held monthly at City Hall. Attendees are afforded the opportunity to provide public comment (in the same manner as is allowed at City Council meetings). Finally, staff from the Community Development Department

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	JACKSON	Community Development
HOME Administrator	JACKSON	Community Development

Table 1 – Responsible Agencies

Narrative

Staff in the City’s Community Development Department administers both the CDBG and HOME grants. Grant administration includes, but is not limited to, researching and analyzing Census data; preparing and submitting the Consolidated Plan, Action Plan, Annual Performance Report, and other reports required by HUD or requested by City Council; performing environmental reviews; maintaining files and records relating to overall grant administration; monitoring sub-grantee performance and providing technical assistance when necessary; reviewing payment requests for eligibility and accuracy; and the financial responsibilities of the grants such as preparing regular drawdowns and reconciling financial records.

Consolidated Plan Public Contact Information

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 Community Development Department
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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

Introduction

Staff in the City of Jackson’s Community Development Department is responsible for preparing the Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER). This section summarizes the consultation and citizen outreach conducted during the planning process.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The City’s current Grant Coordinator participates in the monthly Continuum of Care (CoC) meetings. The Grant Coordinator also serves as the staff liaison for the City of Jackson Affordable Housing Development Board (AHDB). Both of these prior positions proved extremely insightful to the true nature of the City’s homeless and low-income populations. Continued participation with the CoC allows for ongoing interaction with the various service providers and awareness of current and emerging conditions in the community. Interaction with the AHDB provides insight regarding affordable housing issues and trends from knowledge community leaders and industry professionals.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The Community Action Agency (CAA) is the lead agency for the CoC and also serves as the CoC’s fiduciary. The CoC votes on activities to fund with grants it receives from HUD and the State of Michigan, and monitors the progress of those grants through monthly, quarterly, and annual reports and discussion. CAA also receives Supportive Services for Veteran Families (SSVF) from the Department of Veterans Affairs which is also included in reports to the CoC.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The CoC is charged with setting priorities for Emergency Solutions Grant (ESG) funds received through the State of Michigan. Various subcommittees of the CoC, such as Steering, Quality Control, and Housing review applications and make recommendations to the CoC body for allocation purposes. Regular consultation and reporting ensures that the use of ESG remains consistent with CoC priorities.

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

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1	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Community Action Agency</p> <p>Housing Services: housing, homeless, education</p> <p>Housing Need Assessment Homelessness Strategy Homeless Needs: chronically homeless, families with children, Veterans, unaccompanied youth Non-Homeless Special Needs Market Analysis</p> <p>Participation in CoC, direct consultation, email consultation.</p>
2	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Jackson Housing Commission</p> <p>Housing PHA Services: housing, homeless</p> <p>Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs: chronically homeless, families with children, Veterans Non-Homeless Special Needs Market Analysis</p> <p>Participation in CoC, direct consultation, email consultation.</p>
3	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Do'Chas</p> <p>Housing Services: housing, children, homeless</p> <p>Housing Need Assessment Homelessness Strategy Unaccompanied youth Non-Homeless Special Needs</p> <p>Participation in CoC.</p>

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4	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Training and Treatment Innovations</p> <p>Housing Services; persons with disabilities, homeless, health</p> <p>Housing Need Assessment Homelessness Strategy Homeless Needs: chronically homeless, families with children Non-Homeless Special Needs Market Analysis</p> <p>Participation in CoC.</p>
5	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Kate Martin Works</p> <p>Housing PHA Services: housing, children, elderly persons, persons with disabilities, victims of domestic violence, homeless, health, education, employment, fair housing, victims</p> <p>Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs: chronically homeless, families with children, Veterans, unaccompanied youth Non-Homeless Special Needs Market Analysis</p> <p>Participation through CoC, direct consultation, email consultation.</p>
6	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>AWARE, Inc</p> <p>Housing Services: housing, children, victims of domestic violence, homeless, health, education, employment, victims</p> <p>Housing Need Assessment Homelessness Strategy Homeless Needs - families with children Non-Homeless Special Needs Market Analysis</p> <p>Participation in CoC, email consultation.</p>

7	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Jackson Interfaith Shelter</p> <p>Housing Services: housing, children, homeless</p> <p>Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth</p> <p>Participation in CoC</p>
8	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Legal Services Of South Central Michigan</p> <p>Housing Services: housing, children, elderly persons, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, homeless, health, fair housing, victims</p> <p>Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis</p> <p>Participation through CoC, direct consultation, email consultation.</p>
9	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>disAbility Connections</p> <p>Housing Services-Persons with Disabilities</p> <p>Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs</p> <p>Participation through CoC</p>
10	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p>	<p>Department of Health & Human Services</p> <p>Housing Services: housing, children, elderly persons, persons with disabilities, victims of domestic violence, health Health Agency Child Welfare Agency Other government - State</p>

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Participation through CoC
11	Agency/Group/Organization	Henry Ford Allegiance Health
	Agency/Group/Organization Type	Housing Services: homeless, health Health Agency Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Participation through CoC
12	Agency/Group/Organization	United Way of Jackson County
	Agency/Group/Organization Type	Services: housing, children, elderly persons, persons with disabilities, victims of domestic violence, homeless, health, education, employment Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email consultation

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

Efforts were made to include a wide range of community stakeholders in the consultation process; no agency was intentionally excluded from participation.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Community Action Agency	The CoC works to support homeless individuals and families work toward self-sufficiency.
Statewide Housing Plan	Michigan State Housing Development Authority	This strategic plan to addresses housing needs across all geographic and income areas.
2016 Community Master Plan	City of Jackson	This comprehensive plan focuses on housing, economic development, land use, transportation, health, community facilities, services, and other related topics.
Comprehensive Economic Development Strategy	Region 2 Planning Commission	Provides an analysis of the local economy, identification of economic development goals and strategies, and efforts to reduce unemployment and increase income.
Housing Strategy and Policy Framework	City of Jackson	This comprehensive, City-wide needs assessment provides data-informed suggestions related housing needs at all levels over a 10-year span.
Capital Improvements Plan	City of Jackson	A 5-year plan outlining necessary spending for critical infrastructure projects.
Economic Development Strategy	City of Jackson	Provides an analysis of the local economy in the City specifically, and identification of economic development goals and strategies.
Public Participation Plan	City of Jackson	Filled with goals, strategies, and processes to encourage complete and thoughtful engagement with citizens and community groups in the City of Jackson.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

City of Jackson leaders and staff maintain an open cooperative effort with the County of Jackson and surrounding townships to the extent possible as it impacts each of the communities and the County as a whole. Efforts to assist the Jackson Housing Commission with their ongoing efforts will continue. City staff consults with the Jackson County Health Department and various departments of the State of Michigan to improve the health and livability of the community. The City of Jackson is a recipient of numerous grant funds from the Michigan State Housing Development Authority (MSHDA), and the Grant Coordinator serves as the chair of the MSHDA Region K Housing Stock Working Group. Collaboration with MSHDA and local/state partners continues through this work, and through frequent attendance at regional / state housing events.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City of Jackson follows its Citizen Participation Plan to encourage citizen participation in the planning and utilization of CDBG and HOME funds. A public hearing is held in January to receive comments on the housing and community development needs in the City before the Consolidated Plan and/or Annual Action Plan is available for citizen comment. Notice of the public hearing is available on the City's website and printed as a display ad in two local newspapers no less than ten (10) days in advance of the hearing. All views and comments are considered and incorporated in the appropriate plan.

Once the Consolidated Plan and/or Annual Action Plan is in draft form, the public is provided 30 days to review and submit comments; notice of the availability of the plan is again published in the two newspapers and listed on the City's website. Hard copies are made available at two (2) locations in City Hall, at the Community Action Agency, the main branch of the Jackson District Library, and the three (3) public housing complexes; an electronic version is available through the City's website. All views and comments are considered and incorporated in the appropriate plan.

The public is also notified when the City submits its Request for Release of Funds via newspapers and the City's website, and allows for no less than 15 days to submit comments. If a substantial amendment is required during the course of the program year, hard and electronic copies are made available at the locations noted above with the notice of availability published in the local papers and on the website. Citizens are provided no less than 30 days within which to submit written comments and/or to attend a public hearing to provide oral comments. The annual report is published and distributed in the same manner as described above, culminating in a public hearing after a 15 day comment period.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A public hearing was held before the Jackson City Council on January 14, 2025. Three citizens spoke during the public hearing.	Request to continue the City's 100 Homes Program with additional DPA funding; using CDBG/HOME funds to assist landlords with property maintenance and/or to cover rental inspection fees; wisely use HOME (& CDBG) funds for affordable housing efforts; unrelated comments regarding the work of local nonprofit agencies providing homeless assistance and supportive services; unrelated comments related to the design of new construction homes.	No comments or views were declined by the Jackson City Council; however, due to various federal rules and regulations, the City is not able to enact certain suggestions. The City already has programs in place to address some of the other suggestions and notes there are other funding resources available for other suggestions.	
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Notice of the Public Hearing; availability of the draft Consolidated Plan and Annual Action Plan in both hard copy and electronic form and time within which to submit comments.	No written comments were received.	No written comments were received.	
3	Internet Outreach	Non-targeted/broad community	No written comments were received.	No written comments were received.	No written comments were received.	

2025-2029 5-Year Consolidated Plan, City of Jackson (draft)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Jackson District Library Carnegie Branch	Minorities Persons with disabilities Non-targeted/broad community	Hard copy of Consolidated Plan and Annual Action Plan made available in the Resource Center for public review and comment.	No written comments were received.	No written comments were received.	
5	Jackson Housing Commission	Minorities Persons with disabilities Residents of Public and Assisted Housing	Hard copy of Consolidated Plan and Annual Action Plan made available for public review/ comment at three locations: Chalet Terrace, Reed Manor, and Shahan-Blackstone North.	No written comments were received.	No written comments were received.	
6	Community Action Agency	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Hard copy of Consolidated Plan and Annual Action Plan made available in CAA's lobby for public review/comment.	No written comments were received.	No written comments were received.	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
7	Jackson County Continuum of Care	Service Providers	A presentation was made at the CoC meeting on 1/7/25, and suggestions were recorded from various members and guests in attendance.	Assistance was requested for homeless supportive services funding; gap financing was requested for local nonprofits facing budget shortfalls; funding was requested to support collaborative efforts of local nonprofit agencies and/or to support housing clinics; unrelated comments were reporting regarding tiny home ordinances in the City.	See <i>public hearing</i> above.	
8	Affordable Housing Development Board	Service providers Residents of low-moderate income housing	AHDB board members and one citizen provides comments at the meeting held on 1/7/25	CDBG and HOME funds could be used for permanent supportive housing efforts; HOME funds could be used for TBRA or additional down-payment assistance for single-family new construction; provide “just in case” funding to landlords to offset costs of tenant damage to affordable rental units	See <i>public hearing</i> above	
9	Various Community Events	Non-targeted/broad community	Community members shared feedback at block parties, neighborhood meetings, ward meetings, and housing events	Continue offering homeowner rehabilitation assistance; add a rehabilitation program for families earning 80-120% AMI; construct additional affordable housing units; provide a portion of the City’s HUD funding to the JHC	See <i>public hearing</i> above	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment of the Consolidated Plan, in conjunction with information gathered through consultations and the citizen participation process, provides a picture of the City's needs related to affordable housing, special needs housing, community development, and homelessness. Most of the data tables in this section were pre-populated by HUD using the American Community Survey 2016-2020 Five-Year Estimates (ACS). The subsequent pages provide a summary of the City's projected needs for the ensuing five-year period.

Housing Needs Assessment - reviews housing needs according to the categories listed in the regulations, including income level, tenure, and household type, and by housing problems, including cost burden, overcrowding, and substandard housing conditions. Housing problems, in this context, include the following:

- Lack of a complete kitchen or plumbing facilities.
- Cost burden, which is the percentage of a household's total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payments, taxes, insurance, and utilities.
- Overcrowding, defined as more than one (1) person per room, not including bathrooms, porches, foyers, halls, or half-rooms.

Disproportionately Greater Need - a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

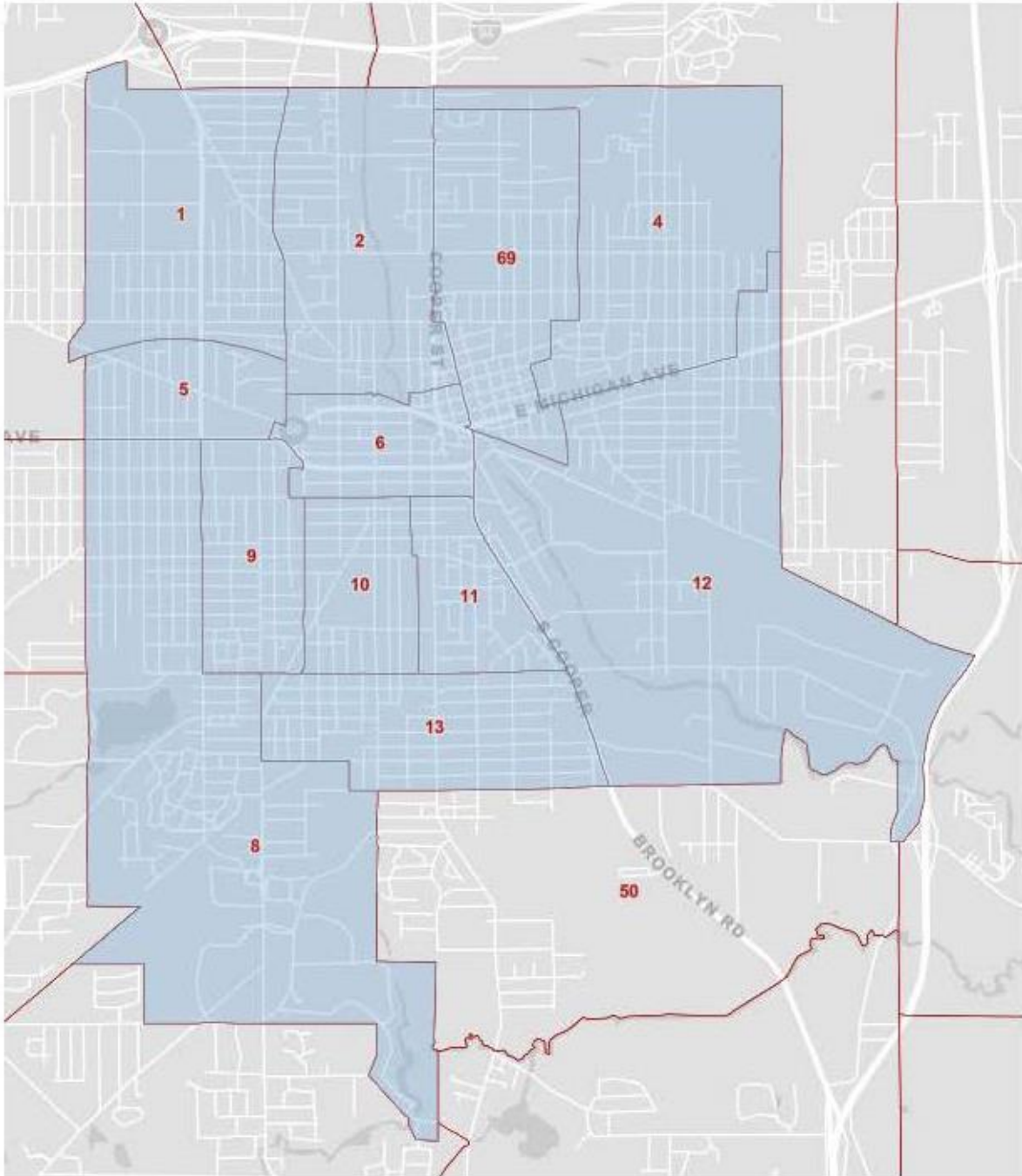
Public Housing - identifies public housing within the City's and the needs of public housing residents.

Homeless Needs Assessment - describes the nature and extent of homelessness within the City of Jackson. Data from the Homeless Management Information System (HMIS) and the Point in Time (PIT) count is used as a baseline for this section. Estimates are provided regarding the number of persons experiencing homelessness on a given night, the number of persons who experience homelessness each year, the number of persons who lose their housing and become homeless each year, the number of persons who exit homelessness each year, the number of days that persons experience homelessness, and other measures specified by HUD. Narratives describe the characteristics and needs of low-income individuals and families with children who are currently housed but threatened with homelessness.

Non-Homeless Special Needs Assessment - describes the level of housing need for persons who are not homeless but require supportive housing, including the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, public housing residents, and other similar categories.

Non-Housing Community Development Needs - summarizes the City's priority non-housing community development needs, including the need for public facilities, public improvements, public services, and other eligible uses of CDBG funds.

City of Jackson Census Tracts



NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Cost burden is the most common housing problem for both renters and homeowners. Cost burden is the percentage of a household’s total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payments, taxes, insurance, and utilities. A household is considered cost burdened if more than 30% of its income is expended on housing costs; a severely cost burdened household devotes more than 50% of its income for housing.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	33,255	32,250	-3%
Households	12,650	13,465	6%
Median Income	\$28,087.00	\$37,192.00	32%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	3,325	2,090	2,955	1,425	3,670
Small Family Households	990	690	980	760	1,885
Large Family Households	155	145	230	105	245
Household contains at least one person 62-74 years of age	500	420	460	215	885
Household contains at least one person age 75 or older	133	160	210	165	169
Households with one or more children 6 years old or younger	514	405	350	230	234

Table 6 - Total Households Table

Data Source: 2016-2020 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Number of Households -- Renter					Number of Households -- Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	30	10	0	0	40	0	0	0	4	4
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	35	10	0	0	45	0	4	0	0	4
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	15	0	75	0	90	10	35	4	10	59
Housing cost burden greater than 50% of income (and none of the above problems)	1,330	70	15	0	1,415	380	85	25	0	490
Housing cost burden greater than 30% of income (and none of the above problems)	320	695	335	0	1,350	265	320	195	40	820
Zero/negative Income (and none of the above problems)	270	0	0	0	270	85	0	0	0	85

Table 7 – Housing Problems Table

Data 2016-2020 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Number of Households -- Renter					Number of Households -- Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	1,405	90	90	0	1,585	395	125	35	15	570
Having none of four housing problems	1,055	1,065	1,180	415	3,715	470	810	1,650	1,000	3,930
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data 2016-2020 CHAS
Source:

3. Cost Burden > 30%

	Number of Households -- Renter				Number of Households -- Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	485	295	85	865	155	100	54	309
Large Related	75	50	0	125	35	10	15	60
Elderly	240	125	15	380	240	119	55	414
Other	930	310	250	1,490	220	165	100	485
Total need by income	1,730	780	350	2,860	650	394	224	1,268

Table 9 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

4. Cost Burden > 50%

	Number of Households -- Renter				Number of Households -- Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	0	0	35	35	90	10	0	100
Large Related	0	0	0	0	15	0	0	15
Elderly	185	30	0	215	130	59	15	204
Other	0	750	20	770	145	0	0	145
Total need by income	185	780	55	1,020	380	69	15	464

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS
Source:

5. Crowding (More than one person per room)

	Number of Households -- Renter					Number of Households -- Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	25	10	75	0	110	0	29	4	0	33
Multiple, unrelated family households	15	0	0	0	15	10	4	0	10	24
Other, non-family households	4	0	0	0	4	0	0	0	0	0
Total need by income	44	10	75	0	129	10	33	4	10	57

Table 11 – Crowding Information – 1/2

Data 2016-2020 CHAS
Source:

	Number of Households -- Renter				Number of Households -- Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	299	237	292	827	368	292	359	1,019

Table 12 – Crowding Information – 2/2

Data 2020 Census Data
Source:

Describe the number and type of single person households in need of housing assistance.

By HUD's definition, the category "Other" in the tables above include single person households and households of unrelated individuals. According to the 2020 American Community Survey (ACS) 5- Year Estimates, there are 13,467 total households of which 2,863 are noted as householder living alone which equates to 21.3% of total households. *Source: 2020 ACS DP02 – Selected Social Characteristics*

Jackson does not collect specific data on single person households and that information is not part of the pre-populated data provided by HUD through its eCon Planning Suite. An extrapolation of data in *Table 9 – Cost Burden >30%* and *Table 10 – Cost Burden >50%* is required to determine the estimated number of single person households needing housing assistance by applying the 21.3% to the "Other" category.

Housing Problem	Renters	Owners
Cost Burden (>30%)	317	103
Cost Burden (>50%)	164	31

Because 21.3% of all City of Jackson households are single person households, this percentage could be applied to all categories and income levels in *Table 7 – Housing Problems Table* and *Table 8 – Housing Problems 2* to obtain an estimated number of single person households afflicted with these housing problems. The data supports what one would generally assume, the less money a household earns, the greater its cost burden or severe cost burden, and the likelihood the household experiences other types of housing problems.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

HUD and the Census/American Community Survey do not provide specific data to respond to this question; however, extrapolations can be made using the available data. Relying on 2020 ACS tables, approximately 16.9% of the non-institutionalized population claims a disability. This is further subdivided to indicate 6.3% of persons under 18 years of age, 18.0% of persons 18 to 64 years old, and 36.3% of persons 65 years and older have a disability (*Source: Table DP02: Selected Social Characteristics*). Table B18140 provides information on the median earnings in the past 12 months (in 2020 inflation-adjusted dollars) by disability status and gender for the civilian non-institutionalized population 16 years and over. This table reports the total median income for the City of Jackson is \$25,814 and is further delineated as follows:

- With a disability \$14,819 (42.6% less than total)
 - Male \$19,438 (24.7% less than total)
 - Female \$11,604 (55.0% less than total)
- No disability \$26,595 (3.0% more than total)
 - Male \$29,898 (15.8% more than total)
 - Female \$25,078 (2.9% less than total)

From the above data, an assumption can be made that persons with a disability earn less than the median income while female residents, with or without a disability, earn less than the median income. An approximate number and type of family with a disabled member in need of housing assistance could be determined by multiplying the numbers indicated in the tables above by 16.9%; however, given the

strong likelihood persons with disabilities earn much less than their able-bodied counterparts, this approximation is assumed to be low.

The most recent Annual Report from AWARE, Inc., Jackson’s local domestic violence shelter, covered the period of October 1, 2023 through September 30, 2024. During that year, 71 survivors of domestic and sexual violence received crisis support through individual counseling services and support groups. Emergency shelter was provided to 118 adults and 65 children as a safe and supportive setting for a total of 5,493 nights of shelter. AWARE received 994 crisis calls, and provided support to 21 survivors through their Sexual Assault Response Team. Legal advocacy services were provided to 179 adults and children seeking remedies through the courts, including court accompaniment, victim notification, outreach, safety planning, or referrals. Financial assistance for utility costs, rent, transportation, household items, clothing, food, and the costs for process service of civil protection orders was provided to 67 families, and 170 individuals received training on domestic and sexual violence.

What are the most common housing problems?

Being cost burdened is the most common housing problem for both renters and homeowners. Over thirty-eight percent (38.8%) of tenants in the City of Jackson earn \$20,000 or less annually and a majority (82.8%) need more than 30% of their gross income to pay for housing. Another 23.4% of renters earn between \$20,000 to \$34,999 per year with more than half (59.5%) still experiencing cost burden. Subsequent income levels include \$35,000 to \$49,999 (12.1% of tenants with 25.0% reporting cost burden), \$50,000 to \$74,999 (11.0% of tenants) and \$75,000 or more (6.2% of tenants). Less than 1% of renters in the two highest income levels experience a cost burden. *Source: ACS Table B25106.*

Conversely, the most common income level for homeowners is over \$75,000 (30.5%) with less than 1% experiencing a cost burden. Almost 3% of homeowners in the income range of \$50,000 to \$74,999 (2.7%) pay 30% or more of their gross earnings for housing. The most cost burdened homeowners are those earning \$20,000 or less with 81.6% reporting they are cost burdened. An estimated 12.1% of homeowners earn less than \$20,000 per year with 17.3% of homeowners earning \$20,000 to \$34,999 per year. *Source: ACS Table B25106.*

Are any populations/household types more affected than others by these problems?

HUD defines “extremely low income” as those earning less than 30% of the Area Median Income (AMI). Other definitions include very low income (earning 30% to 50% AMI) and low-income (earning 50% to 80% AMI). While being cost burdened affects renters and homeowners alike, only 16.3% of homeowners earning \$35,000 or less are cost burdened while 46.1% of renters cannot afford housing. This disparity is likely due to the fact only 29.3% of homeowners earn less than \$35,000, making homeownership out of reach for many. By contrast, 62.2% of renters earn less than \$35,000.

Data provided in *Table 9 – Cost Burden >30%* above indicates 45.1% of renters earning 80% AMI or less suffer from cost burden while only 20% of homeowners earning 80% AMI or less experience the same. By far, extremely low-income renters endure the highest percentage of being cost burdened at 75.5% with very low-income renters at 42.9%. In contrast, 28.4% of extremely low-income homeowners and 21.6% of very low-income homeowners report the same issues.

Data provided in *Table 10 – Cost Burden >50%*, which is also referred to as severely cost burdened, seems to contradict local anecdotal information and media reports. According to Table 10, only 16.1% of renters earning 80% AMI or less are severely cost burdened, with the most severely impacted group

being very low-income at 42.9%. Only 7.3% of homeowners earning 80% AMI or less are apparently severely cost burdened with 16.6% of extremely low-income homeowners paying more than 50% of their gross income on housing costs.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The most recent published Point-in-Time (PIT) Count conducted in 2024 indicated Jackson had 99 homeless persons, 87 of which were sheltered and 12 unsheltered. These numbers were virtually identical to the PIT Count conducted five years ago when numbers in 2019 were 97 homeless, 84 sheltered and 13 unsheltered. Fifty-five (55) homeless persons were individuals while 32 persons made up homeless families with children. Eight (8) persons were counted as chronically homeless with one-half sheltered and one-half unsheltered at the time of the count. Two (2) persons were listed as homeless veterans with both being sheltered. Four (4) unaccompanied youth aged 18 to 24 years old were counted with all being unsheltered.

The Jackson County Continuum of Care (CoC) receives CoC funding from HUD, Emergency Solutions Grant (ESG) funds from the Michigan State Housing Development Authority (MSHDA), and Supportive Services for Veteran Families (SSVF) from Veterans Affairs.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

According to data provided, the population most at-risk of becoming homeless are both homeowners and renters earning less than 30% AMI and being cost burdened. Other populations overly at risk of homelessness include victims of domestic violence, those with severe mental health issues, people exiting incarceration, and substance abusers.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Households that spend more than 50% of their gross income on housing costs face an increased risk of homelessness. The inability to save money due to excessive housing costs and low income creates a household unable to absorb unexpected life challenges. The high cost of housing may force a family to live in areas that provide little access to opportunities or are unsafe.

In 2019, the Fair Market Rent (FMR) in Jackson for a three (3) bedroom apartment was \$1,031 per month. By 2025, FMR for the same three (3) bedroom apartment is \$1,469, an increase of 42.5%. A family of four (mother/father, son, daughter) to afford the FMR for an apartment which accommodates its family structure, the gross household income would need to be approximately \$60,000. The housing wage for this theoretical family is \$28.85 which would require 2.3 full time jobs at Michigan's minimum wage of \$12.48 per hour (effective February 21, 2025).

Assuming this same family's gross income was \$31,200 (30% AMI for 2024), affordable rent for a three (3) bedroom apartment would be \$780 per month. This would likely lead to an overcrowding situation as the family may need to rent an apartment with less than the appropriate number of bedrooms it

needs. In this hypothetical situation, this family would be spending approximately 56.5 % of its gross income for a three (3) bedroom apartment at 2025 FMR.

Discussion

Between 2012 and 2025, the City of Jackson demolished over 1,100 foreclosed, vacant, or abandoned severely blighted residential housing units. These houses were neither habitable nor affordable due to the level of neglect, obsolescence, and lack of energy efficiency.

The community is beginning to rebound through public and private development of new residential housing units as follows:

- **Lofts on Louis** - \$5.4 million mixed-use development in downtown with 30 market rate loft apartments (completed)
- **The 200** - \$13 million mixed-use development in downtown offering 86 market rate units (completed)
- **Francis Senior Lofts** - \$9.5 million project offering 46 units of senior housing to low income persons aged 55 and older. The project received \$800,000 in LIHTC and will receive project based vouchers from the Jackson Housing Commission (completed)
- **Albert Kahn Apartments** - \$17 million mixed-use project housing 73 low-income apartments on upper floors. This project also received LIHTCs from the State of Michigan (completed)
- **The Greenwood** - \$15.6 million mixed-use project with 51 workforce apartments on upper floors. This project also received LIHTCs from the State of Michigan (under construction)
- **The Blackstone** – \$14.8 million project with 52 workforce apartments and a community room, fitness center, and daycare facility. This project also received LIHTCs from the State of Michigan (under construction)
- **Allen Edwin Homes** – Single-family rental homes under construction throughout the City (scattered-site infill development), marketed to families under 120% of the AMI or less. This project is a City payment-in-lieu-of-taxes (PILOT) project (some completed, some under construction, additional units planned for the future)
- **VMG Homes** – single-family homes and duplexes under construction in the City’s Health District (under construction, additional units planned for the future)
- **100 Homes Program** – single-family homes under construction through the City (scattered-site infill development), supplemented with down-payment assistance for qualified buyers earning at or below 120% AMI. This project is funded with American Rescue Plan Act (ARPA) dollars (under construction, additional units planned for the future)
- **Transitional Homeless Housing** – single-family homes to be constructed for families/individuals suffering the effects of homelessness. This project is funded through the HOME-ARP program (Summer 2025 anticipated start date)
- **Visitable Homes** – single-family homes to be construction for families/individuals with disabilities. This project is funded through the MICH Program, Michigan State Housing Development Authority (MSHDA), for families earning at or below 60% AMI (Spring 2025 anticipated start date)

City of Jackson leaders assisted these multi-million dollar projects from the planning stages through obtaining tax credits. Additional multi-story, multi-unit projects are in the planning phases at sites throughout the City, with plans for both market rate and affordable units. Jackson is currently using its CDBG and HOME funds to increase affordable housing options as follows:

- **Homeowner Rehabilitation Assistance Program** – this CDBG activity provides assistance to eligible owner-occupied properties for the replacement of failing major component systems.
- **Habitat for Humanity** – recently certified to serve as the City’s Community Housing Development Organization (CHDO), Habitat will create four(4) new single family homes for resale to income-qualified individuals or families during its initial phase. Habitat has also partnered with the Michigan State Housing Development Authority (MSHDA) to construct homes for disabled persons, and will utilize a portion of the City’s HOME funds CHDO set-aside to assist with one of these projects.
- **Community Action Agency** – utilizing HOME funds for the rehabilitation of former rental properties that have been converted to owner-occupied in the Partnership Park area.
- **Welcome Home Organization & Kings Community Homes** – utilizing HOME-ARP funds to construct four (2 each) single-family homes for individuals/families facing difficulties from homelessness, all within HUD-defined qualifying populations.

City leaders have devoted a significant amount of resources to reduce blight in residential neighborhoods and redevelop Jackson into a place where people want to live, work, and play. This transformation does not occur overnight and takes several years of concentrated, focused effort. Jackson started with enhancing its downtown and continues by expanding into the surrounding neighborhoods. Entrepreneurial investment is also coming to Jackson, further increasing the need for additional owner and non-owner-occupied units throughout the City. Cost-burden issues continue to require attention, and numerous local nonprofit partners work to address these needs through various programs and services. The City of Jackson continues offering down-payment assistance for workforce-style single family new construction through the creative use of funds from the American Rescue Plan Act (ARPA), and is excited to begin work on additional down payment assistance supports for buyers under less than 80% AMI with the use of HOME funds.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. The next several tables provide data to determine if a disproportionately greater need exists by income level for housing problems, severe housing problems, and housing cost burdens.

The four (4) housing problems are:

1. Lacks complete kitchen facilities (a sink with faucet, a stove or range, and a refrigerator);
2. Lacks complete plumbing facilities (hot/cold running water, flush toilet, and bathtub or shower);
3. More than one (1) person per room; and
4. Cost burden greater than 30%.

Although the purpose of this section is to analyze the relative level of need for each race and ethnic category, the data also provides information for the City as a whole, which is useful in describing overall need.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,385	940	0
White	1,405	400	0
Black / African American	580	400	0
Asian	35	0	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	205	110	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS
Source:

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,225	860	0
White	750	620	0
Black / African American	410	175	0
Asian	0	15	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	24	55	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	650	2,300	0
White	490	1,880	0
Black / African American	160	260	0
Asian	0	19	0
American Indian, Alaska Native	0	8	0
Pacific Islander	0	0	0
Hispanic	0	85	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	55	1,375	0
White	45	1,000	0
Black / African American	10	265	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	25	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

Discussion

The Housing Needs Assessment (NA-10) indicates a total of 13,465 occupied housing units in the City of Jackson. The percentage of “Jurisdiction as a whole” is derived by dividing the number listed in the income categories tables above by 13,465. To determine if a disproportionately greater need exists within a specific racial or ethnic category within a specific income range, the number listed for the racial/ethnic category is divided by the number listed for the jurisdiction as a whole.

0 – 30% AMI

The percentage of extremely low-income residents experiencing one (1) or more of four (4) housing problems is 17.7%. A disproportionately greater needs exists for both extremely low-income White (58.9%) and Black/African American (24.3%) residents.

30 – 50% AMI

The percentage of very low-income residents experiencing one (1) or more of four (4) housing problems is 9.1%. A disproportionately greater needs exists for very low-income White residents (61.2%) while 33.5% of very low-income Black/African American households report housing problems.

50 – 80% AMI

The percentage of low-income residents experiencing one (1) or more of four (4) housing problems is 4.8%. A disproportionately greater needs exists for both low-income White (75.4%) and Black/African American (24.6%) households.

80 – 100% AMI

The percentage of moderate-income residents experiencing one (1) or more of four (4) housing problems is 0.4%. A disproportionately greater needs exists for both moderate-income White (81.8%) and Black/African American (18.2%) citizens.

In summary, less than 20% of the entire jurisdiction earning less than 30% AMI faces one (1) or more of the four (4) housing problems, which improves as income level increases. For households earning 30% - 50% AMI 9.1% have one (1) or more housing problems, while 4.8% of those earning 50% - 80% and less than 1.0% of households earning 80% - 100% AMI deal with one (1) or more housing problems.

Analysis of the data indicates a disproportionately greater need exists for both the White and Black/African American communities versus the City as a whole at each income level. The higher percentage of White residents reporting housing problems likely correlates to fact the City as a whole is predominately White (72%) compared to Black/African American (19.9%). *Source: 2020 ACS DP05 – Demographic and Housing Estimates.* There is no indication of a disproportionate need existing among any other race or the Hispanic/Latino community when compared to the jurisdiction as a whole.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. The next several tables provide data to determine if a disproportionately greater need exists by income level for housing problems, severe housing problems, and housing cost burdens.

The four (4) severe housing problems are:

1. Lacks complete kitchen facilities (a sink with faucet, a stove or range, and a refrigerator);
2. Lacks complete plumbing facilities (hot/cold running water, flush toilet, and bathtub or shower);
3. More than one and one-half (1.5) persons per room; and
4. Cost burden greater than 50%.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,800	1,525	0
White	1,045	755	0
Black / African American	430	550	0
Asian	35	0	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	145	165	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS
Source:

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	215	1,875	0
White	140	1,230	0
Black / African American	45	540	0
Asian	0	15	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	4	75	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	125	2,830	0
White	120	2,250	0
Black / African American	4	410	0
Asian	0	19	0
American Indian, Alaska Native	0	8	0
Pacific Islander	0	0	0
Hispanic	0	85	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	15	1,415	0
White	15	1,030	0
Black / African American	0	275	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	25	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
Source:

Discussion

The Housing Needs Assessment (NA-10) indicates a total of 13,465 households in the City of Jackson. The percentage of “Jurisdiction as a whole” is derived by dividing the number listed in the income categories tables above by 13,465. To determine if a greater disproportionate need exists within a specific racial or ethnic category within a specific income range, the number listed for the racial/ethnic category is divided by the number listed for the jurisdiction as a whole.

0 – 30% AMI

The percentage of extremely low-income residents experiencing one (1) or more of four (4) severe housing problems is 13.4%. A disproportionately greater needs exists for both extremely low-income White (58.1%) and Black/African American (23.9%) residents.

30 – 50% AMI

The percentage of very low-income residents experiencing one (1) or more of four (4) severe housing problems is 1.6%. A disproportionately greater needs exists for very low-

income White residents (65.1%) while 20.9% of very low-income Black/African American households report at least one severe housing problem.

50 – 80% AMI

The percentage of low-income residents experiencing one (1) or more of four (4) severe housing problems is 0.9%. A disproportionately greater need exists for low-income White households (96.0%) while 3.2% of low-income Black/African American households report at least one severe housing problem.

80 – 100% AMI

The percentage of moderate-income residents experiencing one (1) or more of four (4) severe housing problems is 0.1%. The data provided by HUD suggests all severe housing problems are only experienced by moderate-income White residents. It is the opinion of this writer that the information in Table 20 should not be considered accurate, even as an estimate.

Over 13% of the City residents earning less than 30% AMI face one (1) or more of the four (4) severe housing problems, which improves as income level increases. For households earning 30% - 50% AMI, 1.6% have one or more severe housing problems, while less only 1.0% of those earning 50% - 80% AMI and households earning 80% - 100% AMI combined deal with one (1) or more severe housing problems.

Analysis of the data indicates a disproportionately greater need exists for Whites across all income groupings, but only for the Black/African American community earning 80% or less AMI when compared to the entire City. There is no indication of a disproportionate need existing among any other race or the Hispanic/Latino community when compared to the jurisdiction as a whole.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Introduction:

Cost burden is the most common housing problem for renters and homeowners. Cost burden is the percentage of a household’s total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payments, taxes, insurance, and utilities. A household is considered cost burdened if more than 30% of its income is expended on housing costs; a severely cost burdened household devotes more than 50% of its income for housing.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	8,935	2,185	1,990	360
White	6,815	1,390	1,170	165
Black / African American	1,365	680	475	140
Asian	59	0	35	0
American Indian, Alaska Native	19	4	0	0
Pacific Islander	0	0	0	0
Hispanic	445	80	145	45

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion:

The Housing Needs Assessment (NA-10) indicates a total of 13,465 households in the City of Jackson. The percentage of “Jurisdiction as a whole” is derived by dividing the number listed in the income categories tables above by 13,465. To determine if a greater disproportionate need exists within a specific racial or ethnic category within a specific income range, the number listed for the racial/ethnic category is divided by the number listed for the jurisdiction as a whole.

Housing Cost Burden

As a reminder, “Cost Burden” indicates a household uses 30% to 50% of its gross income for housing costs while “Severe Cost Burden” pays more than 50% of its gross income for housing. The “No/Negative Income” category is identified but not computed, as households with zero or negative income cannot actually have a cost burden, but still require housing assistance. Approximately two-thirds of households within the City of Jackson (66.4%) pay less than 30% of their gross income for housing. The percentage of households facing a cost burden (paying 30% to 50% of gross income for housing) is 16.2% in the City with both predominate racial groups exhibiting a greater disproportionate need with White residents at 63.6% and Black/African American residents at 31.1%. There is no indication a disproportionate need exists among any other race or the Hispanic/Latino community when compared to the jurisdiction as a whole. Similarly, 14.8% of households within the City of Jackson experience a severe cost burden requiring over 50% of their gross income for housing costs. Data supplied by HUD indicates Black/African American residents do not experience a disproportionate need as 23.9% report a severe cost burden, which is less than ten (10) percentage points over all households. However, with less than 1 percentage point required to meet the disproportionate need threshold, the potential for a margin of error in the data, and anecdotal information within the community, Black/African Americans also experience a disproportionate severe housing cost burden than the jurisdiction as a whole. White households do display a greater disproportionate need as 58.8% suffer a severe cost burden in meeting their housing needs, which may correlate to the fact the White community comprises 72% of the City’s population.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The housing data reveals housing problems are experienced by the various low-income levels throughout the jurisdiction. The racial groups facing a greater disproportionate need are as follows:

Housing Problems

- 0% - 30% AMI: White Households, Black/African American Households
- 30% - 50% AMI: White Households, Black/African American Households
- 50% - 80% AMI: White Households, Black/African American Households
- 80% - 100% AMI: White Households, Black/African American Households

Severe Housing Problem

- 0% - 30% AMI: White Households, Black/African American Households
- 30% - 50% AMI: White Households, Black/African American Households
- 50% - 80% AMI: White Households, Black/African American Households
- 80% - 100% AMI: White Households

Any Cost Burden

- White Households, Black/African American Households

No/Negative Income

- White Households
- Black/African American Households
- Hispanic Households

If they have needs not identified above, what are those needs?

Per the Comprehensive Housing Affordability Strategy (CHAS) data estimates provided by HUD and used to develop this Consolidated Plan, the needs by race/ethnicity are indicated above. Income categories have other, more general needs, as outlined in the subsequent Housing Needs Assessment and Housing Market Analysis.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

HUD defines a Census Tract (CT) as being "Racially and Ethnically Concentrated Areas of Poverty" (R/ECAP), more specifically detailed as follows:

- At least 40% of the population is living below the federal poverty level (or the poverty level is greater than three times the average poverty rate in the area); and,
- Must have a non-White population of 50% or more.

The percentage of all people in the City of Jackson living below the poverty level for is 24.1% (*Source: 2020 ACS S1701 – Poverty Status in the Past 12 Months*). Three (3) census tracts containing 40% or more of the population living below poverty are in the downtown (Census Tract 6) and immediately adjacent on the south (Census Tracts 10 and 11). Of these extremely impoverished census tracts, only Census Tract 11 has a non-White population of 50% or greater (50.8%). Since the ACS 5-Year Estimates are often incongruent from year to year due to small samplings and estimates, the City also analyzed the 2020 Decennial Census to provide more exact Census Tract data. The 2020 Census indicates both Census Tracts 10 and 11 contained a non-white population over 50% (53.0% and 70.9%, respectively). Unfortunately, the Census no longer collects income information every 10 years, so the 2020 ACS S1701 was relied on for populations living below the poverty level.

NA-35 Public Housing – 91.205(b)

Introduction

The Jackson Housing Commission (JHC) has served as the City’s Public Housing Authority (PHA) for nearly 60 years and also services all of Jackson County. JHC is considered a medium-sized agency providing 500 public housing units, 40 scattered-site single family homes, and up to 475 Housing Choice Vouchers (HCV).

The average public housing resident is extremely low income, stays housed for four (4) years, and consists of a one-person household. Approximately 13% of residents are elderly and 37.3% claim a disability. The racial makeup of public housing residents is nearly 49.5% White, 50.3% Black/African American, and 0.2% Asian. Those claiming a Hispanic/Latino ethnicity account for approximately 1.5% of all residents. HCV, more commonly referred to as “Section 8”, are provided to income eligible individuals or families allowing them to select housing of their choice in the private market. Elderly recipients over age 62 years use nearly nine (9%) percent of the vouchers while families claiming a disability hold 27.4%. The average income of an HCV recipient is also extremely low income but nearly a third more than a public housing resident. The average household size is two (2) persons and hold the voucher for approximately five (5) years. Slightly more than 55% of HCV recipients are Black/African American, nearly 44% White, and Asian or American Indian/Alaska Natives hold approximately one (1%) percent.

The Jackson Housing Commission has been finalizing a comprehensive physical assessment of its properties to be wholly compliant. Reed Manor Building D, comprised of 23 non-dwelling units that are expired in PIC, have been taken offline while the building is rehabilitated/modernized under contract during FY 2024. Building D experienced significant fire damage due to arson committed by a non-tenant in 2021, and has been unoccupied ever since. Work began repairing Building D using obligated JHC Capital Funds, and is expected to be complete by October 2025.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	533	467	0	467	0	0	0

Table 22 - Public Housing by Program Type

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	7,859	11,499	0	11,499	0	0
Average length of stay	0	0	4	5	0	5	0	0
Average Household size	0	0	1	2	0	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	70	41	0	41	0	0
# of Disabled Families	0	0	199	128	0	128	0	0
# of Families requesting accessibility features	0	0	533	467	0	467	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	264	205	0	205	0	0	0
Black/African American	0	0	268	257	0	257	0	0	0
Asian	0	0	1	1	0	1	0	0	0
American Indian/Alaska Native	0	0	0	4	0	4	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	8	13	0	13	0	0	0
Not Hispanic	0	0	525	454	0	454	0	0	0

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Jackson has fully accessible housing units available at all three sites. The JHC has five (5) fully accessible units - two (2) at Reed Manor, two (2) at Shahan-Blackstone North, and one (1) at Chalet Terrace. Preference is given to disabled applicants and reasonable accommodations made to improve accessibility in other units. The intent of future modernization plans is to create fully accessible units in no less than 10% of the units; with hopes to increase the percentage up to 20% after modernization work is completed through these next two-five years. Consultation with the Executive Director of the JHC revealed that JHC property managers now utilize a leasing plan; where vacancies and unit turns are completed in 30 days or less; reviewed weekly contemporaneous to accounts receivable processes.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The most immediate needs of both public housing and HCV holders is access to services, especially mental health services. Food insecurity, which is the disruption of food intake or eating patterns because of the lack of money and other resources, is also a top concern. The struggle to find jobs, especially with the improved job market, is particularly difficult for those with a criminal history.

Section 8 voucher holders experience increasing difficulty in locating a suitable, affordable housing unit with good access to employment and services. Fair Market Rent, published by HUD on an annual basis, determines the upper limits that can be charge by property owners for units rented to voucher holders. Low-income households seeking units that will accept a HUD-subsidized voucher face property owners who may be able to charge higher rents on the open market for the same unit. In addition, housing advocates in Jackson also indicate there are an insufficient number of vouchers available in the community to meet the need of low-income households requiring assistance.

How do these needs compare to the housing needs of the population at large

Essentially, the needs of public housing residents and HCV holders are no different than any other struggling household in Jackson but may be greater and of a wider variety when considered on an individual basis.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The Jackson County Continuum of Care (CoC) is the local homeless assistance planning group which encourages community collaboration to address housing and homeless needs. The CoC is comprised of representatives from a variety of non-profit entities, faith-based organizations, community stakeholders, and state and local government who in combination serve households and individuals experiencing housing crises. The group's structured approach identifies existing needs and resources, detects gaps in service, and monitors emerging conditions. Funding received by the CoC is used to prevent homelessness, rapidly re-house people in a housing crisis, and transform the system so more people can obtain and maintain housing. Homeless providers in Jackson County use a Homeless Management Information System (HMIS) to collect client-level data and data on the provision of housing to homeless individuals and families, and persons at risk of homelessness. The CoC also participates in an annual Point-in-Time (PIT) Count where volunteers count both sheltered and unsheltered persons experiencing homelessness on a single night in January. Data in this Homeless Needs Assessment was gleaned from both the 2023 HMIS data to capture a full year of information, and the 2024 PIT Count conducted on January 31, 2024. There is not a rural homeless population within the City of Jackson.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	11	0	0	232	48	60
Persons in Households with Only Children	0	0	0	2	0	0
Persons in Households with Only Adults	53	12	0	310	405	47
Chronically Homeless Individuals	2	4	0	0	0	0
Chronically Homeless Families	2	0	0	0	0	0
Veterans	2	0	0	30	0	0
Unaccompanied Child	4	0	0	33	0	0
Persons with HIV	1	0	0	0	0	0

Table 26 - Homeless Needs Assessment

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The City of Jackson was not able to obtain the full data required in Table 25 above for the estimate of persons experiencing homelessness each year, number becoming homeless each year, number exiting homeless each year, and number of days persons experience homelessness in the various subcategories. However, utilizing the 2024 Stella Performance

Model (Stella) and 2024 Homeless Data Exchange (HDX) Competition reports, the following information is available:

- 699 unduplicated sheltered homeless persons; approximately 80% experienced homelessness for the first time. Over 90% of those utilizing the emergency shelter exited to a known destination.
- 92 unduplicated persons in permanent housing; 18.5% exited to a known destination.
- 134 unduplicated persons received rapid re-housing (temporary housing) assistance; 52.2% exited to a known destination.
- 34 unduplicated persons were helped through street outreach with 79.4% exiting to a known destination.
- The overall average days a person remains homeless in Jackson is 49 days; adults only average 47 days while adults with children average 60 days. Domestic violence survivors average 56 days of homelessness before being housed.
- 63% of households that exited Jackson’s homeless system were placed in permanent housing.
- While it takes longer on average to house adults with children, this group has a higher percentage of obtaining permanent housing.
- 14% of households, which were all adult only households, returned to the homeless system within six months of exiting to a permanent destination.
- 12% of households experience chronic homelessness, which is defined long-term or repeated homelessness, often coupled with a disabling condition such as serious mental illness, substance use disorder, or physical disability.
- 54% of chronically homeless households had a disabling condition.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered
White	354	0
Black or African American	161	0
Asian	3	0
Native Hawaiian or Other Pacific Islander	8	0
Pacific Islander	2	0
Ethnicity:	Sheltered:	Unsheltered
Hispanic	20	0
Non-Hispanic and Multiple Race	508	0

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The 2024 PIT Count identified 32 homeless family households comprised of both adults and children consisting of 16 persons over age 18, and 16 persons under the age of 18. Two veterans were found sheltered during the PIT Count but not as a family household with children.

In 2024, there were 70 adults aged 18 – 24 years, 353 adults aged 25 – 54 years, 62 adults aged 55 – 64 years, and 20 adults aged 60 or more years old for a total of 505 adults experiencing homelessness (3% of adults were veterans). Slightly more young children (newborn – 5 years) than school-aged children (6 – 17 years) were homeless as well. By gender, homeless men outpaces homeless women by 16 percentage points.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Overall, the White population comprised the greatest percentage of those experiencing homelessness in 2024 at 63%. The Black/African American community was the second highest percentage racial group experiencing homelessness at 29%, followed by the category “Multiple Races” at 4% and 1% for both American Indian/Alaska Native/Indigenous and Asian. The percentage of 2024 homeless persons claiming a Hispanic/Latino ethnicity was 4%. White citizens also averaged 53 days of homelessness compared to 44 days of homelessness on average for Black/African Americans.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2024 PIT Count captured a total of 76 homeless households consisting of 99 persons. Of those, nearly 88% of the persons were sheltered and 12% were unsheltered. The unsheltered population consisted of all single person adult households.

Discussion:

According to the 2024 Housing Inventory Count (HIC) report, which is data collected by the CoC during the PIT Count, beds available for occupancy on the night of the count at emergency shelters were as follows:

Jackson Interfaith Shelter

74 total beds (23 family beds and 51 adult-only beds)

Other (AWARE Shelter, Region 2 motel vouchers, etc.)

16 total beds (9 family beds & 7 adult-only beds)

There are also a total of 103 beds available for those experiencing chronic homelessness as follows:

Community Action Agency

39 total beds (18 family beds and 21 adult-only beds)

Training & Treatment Innovations

37 total beds (26 family beds and 11 adult-only beds)

An additional 74 beds may be counted as available through rapid re-housing funds from HUD, Emergency Solutions Grants, and SSVF.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

A non-homeless special need refers to the housing needs of persons who are not homeless but require supportive housing. This includes, but is not limited to:

- Elderly (defined as 62 years and older)
- Frail elderly (defined as an elderly person who requires assistance with three or more activities of daily living, such as bathing, walking, and performing light housework)
- Persons with mental, physical, and/or developmental disabilities
- Persons with alcohol or other drug addiction
- Persons with HIV/AIDS and their families
- Victims of domestic violence, dating violence, sexual assault, and stalking

Describe the characteristics of special needs populations in your community:

According to the 2020 ACS, 13.9% of the City's residents are aged 62 and over, 2.3% of which are aged 75 and over. Nearly 19.3% of households report having one (1) or more people over 65 years of age living with them while 50.5% of people over 65 years live alone.

Nearly 17% of all City residents report a disability; the age group with the largest percentage of those experiencing a disability are aged 75 years and over at 48.9%. Even though the physical number of Black/African American citizens is lower than White residents, the Black community reports a higher percentage of disabled individuals at 18.4% (White is 17.0%). In addition, an estimated 11.1% of the Hispanic/Latino community are afflicted with a disability. The most common disability reported by all City residents is cognitive impairment, which is when a person has trouble remembering, learning new things, concentrating, or making decisions that affect their everyday life.

Specific information regarding people with drug or alcohol addiction is not readily available through public means. However, Jackson has an array of service providers, both public and private, to help meet the needs of the community.

Jackson does not receive funding for Housing Opportunities for People With AIDS (HOPWA). Persons in the Jackson area receive services from Unified – HIV Health and Beyond in Ypsilanti, MI. Locally, the Jackson County Health Department provides free confidential testing and counseling and participates in "Link-Up Michigan" to connect HIV-positive individuals to medical and non-medical services. AWARE, Inc. is the lead agency for the Jackson County Domestic and Sexual Violence Coordinating Council and participates in many local workgroups. AWARE, which stands for "Abused Women's Assistance and Resources", provides services to meet the needs of survivors of domestic and sexual violence which includes, but is not limited to, emergency shelter, supervised visitation, 24-hour crisis hotline, advocacy, education, and outreach.

According to 2020 ACS information, 21.8% of occupied housing is comprised of four (4) or more persons with the greater share owning their home versus renting. A family of five (5) or more would require at least three (3) bedrooms; the supply of housing with four (4) or more bedrooms is extremely limited with only 14.7% of occupied housing having a sufficient number of bedrooms. With limited housing choices, large family households likely face overcrowding issues more than other household types.

Family households are most common in the City at 54.8% with married couple families accounting for 28.1% of the City's family households, followed by female heads of household (19.8%); male heads of household is least common at 6.9%. Approximately 57% of the female head of household families have children under 18 years present in the home. Of note, a larger percentage of women live below poverty than men which correlates to the fact that overall, women earn 17.5% less than their male counterparts.

What are the housing and supportive service needs of these populations and how are these needs determined?

An individual person's supportive service needs may vary slightly depending on their specific characteristics, but across the board, non-homeless special needs are not different than those of other low-income or homeless households. To be successful, an array of services may be needed by all populations including, but not limited to:

- Affordable housing
- Counseling
- Case management
- Legal services
- Health care
- Transportation

Many other supportive services are needed but are too numerous to list within the limitations of this template.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Due to its sensitive nature, little information is available regarding the City's population with HIV/AIDS and their families. Jackson does not receive funding for Housing Opportunities for People With AIDS (HOPWA). Persons in the Jackson area receive services from Unified – HIV Health and Beyond in Ypsilanti, MI. Unified provides an array of services to residents in Southeast Michigan living with or affected by HIV/AIDS including case management, testing, support groups and workshops, and housing assistance. Locally, the Jackson County Health Department provides free confidential testing and counseling. The Health Department also participates in "Link-Up Michigan" to connect HIV-positive individuals to medical and non-medical services.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

The City of Jackson is not planning to offer tenant-based rental assistance (TBRA) with HOME funds.

Discussion:

Jackson County's non-profit and faith based entities lead community efforts to provide the services needed by homeless, non-homeless special needs, and low-income community members. Funding for these services come from other federal and state resources, and often rely on local fundraising efforts. What resources are available are insufficient to meet the needs of each requiring assistance; however, through collaboration, cross agency communication and support, funds are managed and prioritized to impact those in greatest need.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

In the CDBG program, the term “public facilities” is broadly interpreted to include all facilities that are either publicly owned or that are traditionally provided by the government, or owned by a non-profit and operated so as to be open to the general public. This would include neighborhood facilities, senior centers, homeless facilities, youth centers, parks and recreational facilities, and facilities for special needs populations.

The effectiveness of adding parks and greenspace to a community, especially in low-income neighborhoods and communities of color, has multiple benefits. Historically, community developers created parks and green spaces in affluent neighborhoods rather than in urban low-income communities that experience segregation and disinvestment. Studies in communities such as Philadelphia, Chicago, Los Angeles and East Salinas, California, indicate parks and greenspace improve mental and physical health outcomes; reduce stress, aggression, and the incidence and severity of psychiatric conditions; increase social interaction; enhance childhood development; and reduce and prevent violence (<https://nextcity.org/daily/entry/the-surprising-link-between-parks-and-violence-prevention/>). The addition of parks and green space encourages people to come outdoors to participate in community events and fosters a sense of belonging and pride in the community.

How were these needs determined?

The Jackson City Council has devoted substantial resources to reinvigorate its downtown with the subsequent plan to concentrate funding in the residential neighborhoods immediately adjacent to the downtown. These neighborhoods are among the most distressed in the City and have been subject to enhanced blight elimination in recent years. Constituents in these neighborhoods have challenged City Council to improve the livability, including a reduction in crime to the extent possible. The three (3) target areas identified in this Consolidated Plan will be carefully scrutinized to determine which public facilities will best fit the needs of each area.

Describe the jurisdiction’s need for Public Improvements:

Site improvements of any kind that are made to property that is in public ownership are considered to be a “public improvement” eligible for assistance. Public improvements include streets, sidewalks, curbs and gutters, parks, playgrounds, water and sewer lines, flood and drainage improvements, parking lots, and aesthetic amenities on public property such as trees, sculptures, fountains, and other works of art.

The local government is tasked with maintaining and improving public infrastructure within the community, and is not a responsibility that can be taken on by non-profit, philanthropic, or faith-based organizations. Many communities in Michigan, including Jackson, have been teetering on economic predicaments for years as the manufacturing jobs have diminished, and the recession and housing crisis set in. Revenues in large and small communities have been severely impacted as population left for jobs in other locations, property values fell, and the state withheld revenue sharing.

City leaders in Jackson have adopted a place-making philosophy and over the past several years have focused on blight removal in residential neighborhoods and revitalizing the heart of the urban core, its downtown district. Beautification efforts have enticed private developers to invest in the downtown and adjacent residential neighborhoods. Although a long and arduous process, the great strides taken have positively impacted the City of Jackson.

The biggest frustration from constituents involves deteriorated public infrastructure, especially the condition of local streets. Local street reconstruction, planned years in advance and performed in conjunction with underground utility upgrades, takes advantage of other financial resources available to the City. Again, this is fully the local government's responsibility and very costly to complete. CDBG funds are limited for use in CDBG-eligible areas of the City which are residential in nature with a sufficiently high percentage of low- to moderate-income residents.

In recent years, citizens have repeatedly expressed concern about criminal activity and encouraged City Council to improve street lighting in various neighborhoods. According to the National Institute of Justice, "Improving street lighting to prevent crime is grounded in two main perspectives: 1) situational crime prevention, and 2) strengthening informal social control and community cohesion" <https://www.crimesolutions.gov/PracticeDetails.aspx?ID=38>. One of the City's anticipated outcomes from enhanced blight enforcement over the past several years was to reduce criminal activity in and around foreclosed, vacant, and abandoned housing and to provide greenspace in neighborhoods. To further build on that concept, additional street lighting in these same neighborhoods will reduce the opportunity for crime and/or increase a potential offender's perceived risk of apprehension. Personal safety is a key component to rebuilding neighborhoods so its residents can live, work, play, and learn in confidence.

How were these needs determined?

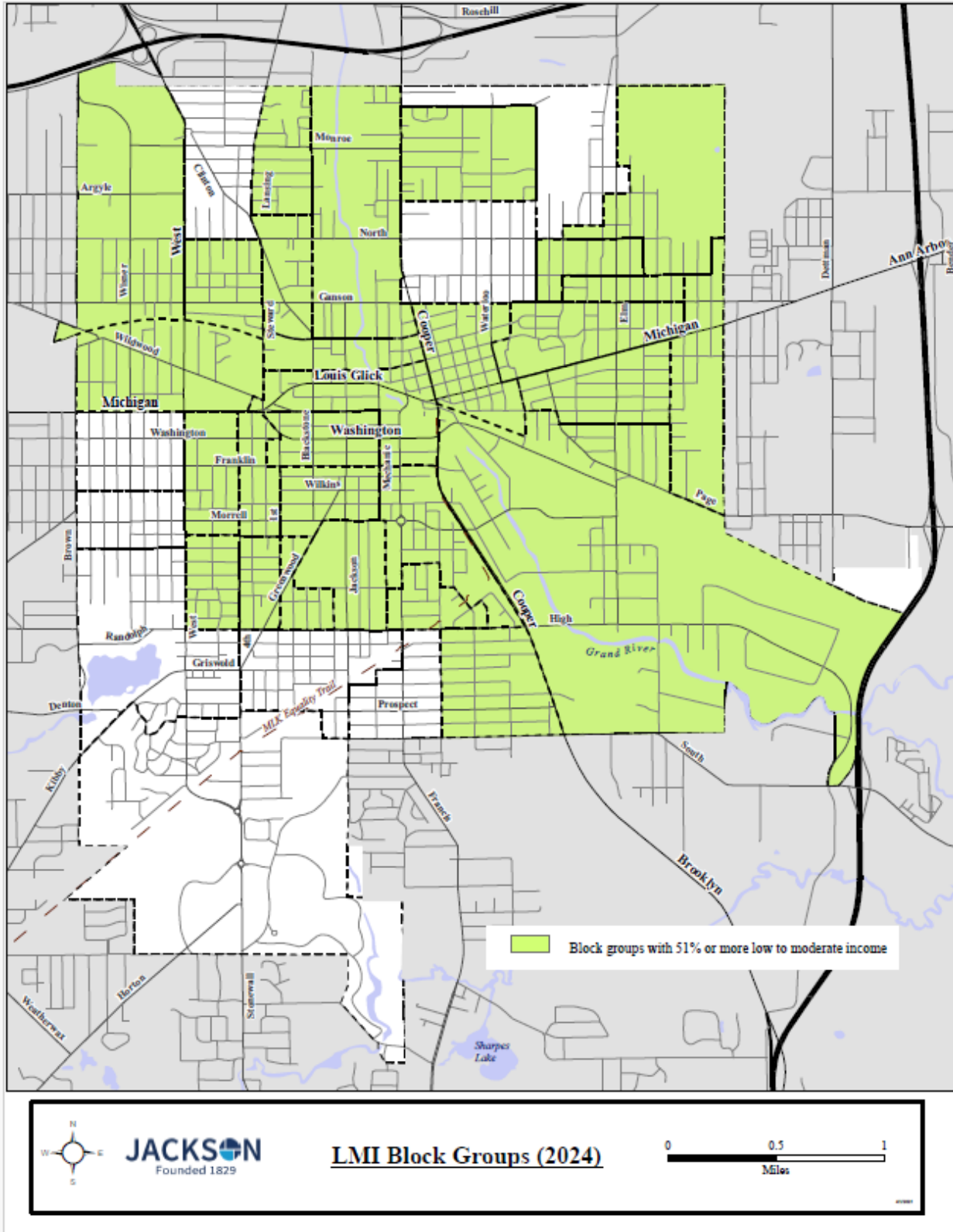
The prevalent complaint among citizens, not only in Jackson but across Michigan, is the neglected state of public infrastructure, especially local road conditions. The City of Jackson will continue its review of local street conditions to determine the priority and extent of street reconstruction necessary. Citizens have also urged City Council to improve the street lighting in these neighborhoods in an effort to reduce crime and return neighborhoods to places where children can play and be safe.

Describe the jurisdiction's need for Public Services:

The City does not deny the need for public services to support its low-income residents, it simply has not received a sufficient level of block grants to address its public infrastructure responsibility and also invest heavily in other activities. The City will continue to fund other activities that benefit the low- to mod-income community, such as rehabilitation, but will leave non-profits to seek other financial resources available to it, such as federal, state, and local grant opportunities, fundraising, and philanthropic donations. Funding public service activities will be considered based on the nature of the service to be provided and as funds allow.

How were these needs determined?

It is unfortunate that the need in Jackson is so much greater than the funds it receives from HUD. As the local government, it is the City's duty to improve public facilities and infrastructure for its citizens to increase accessibility and livability. In order to do so, a majority of CDBG funds are needed to make those improvements in combination with other federal, state, and local funds. Local non-profits and faith-based organizations dedicated to serving Jackson's underprivileged populations must seek out other sources of federal, state, local, and private funds to financially support their programs and services. A collaborative effort to address poverty and "Asset Limited, Income Constrained, Employed" (ALICE) lead by the United Way of Jackson County exists to develop partnerships, invest in programs and work with policymakers, and help ALICE households get past barriers and build financial stability. As so much of the target population of this effort resides within the City of Jackson, local government participation in the collaboration is essential to understand the scope and needs of its residents and possibly lead to financial resources through CDBG.



Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

According to 1930 Census data, the City of Jackson was home to 55,187 people occupying 14,295 housing units. Ninety (90) years later, the 2020 Census reports 31,309 residents occupied 14,138 housing units leaving 1,436 housing units vacant or abandoned. This equates to a 43% decline in population with only a 1% decrease in occupied housing units. The oversupply of housing led to declining property values and low sales prices. Purchasing a home became affordable to persons who lacked the necessary skills and income to maintain the property. Real estate investors, many of whom were negligent, were purchasing the large, well-built single family homes of this formerly prosperous City, subdividing them into multiple units, renting them for what they could, but not reinvesting profits into their upkeep. Years of deferred maintenance on both homeowner and rental units led to more and more vacant and neglected residential properties, especially in lower-income neighborhoods.

Efforts to balance supply and demand included the demolition of more than 1,100 housing units over the last twenty (20) years. Non-owner occupied housing units were more vigorously inspected to ensure tenants were provided decent, safe, and sanitary housing. The pro-side is homeowners are able to sell their properties, realizing a return on their investment; the con-side is housing is becoming less affordable to either purchase or rent even though housing prices in the City are more affordable than in the surrounding townships and adjacent counties. In a community in which a majority of residential households earn less than 80% of the Area Median Income (AMI) - and the number of housing units still exceeds the population - low-income households are heavily dependent on the supply of affordable rental housing. The City of Jackson created the Affordable Housing Development Board in November 2021, tasking this body with preserving and developing affordable housing, making recommendations to City officials on initiatives that create safe, dignified, and affordable housing options in the City of Jackson, and administering the City's Affordable Housing Fund. Members provide industry-based insight and observations from lived experience to assist staff and elected officials with the creation of relevant programs aimed at combatting the affordable housing crisis in Jackson. The City of Jackson, in collaboration with the Affordable Housing Development Board and Guidehouse Consulting, and with input from many community partners, created a City-wide housing needs assessment (finalized in 2023). This data-informed, comprehensive study outlines short and long-term goals aimed at combating Jackson's housing shortage at all levels, including the rehabilitation of 3,000 existing housing units and the construction of 1,500 new housing units over (2023-2033). Specific needs identified under these two categories included:

1. Rehabilitation of aging housing stock
2. Rehabilitation of vacant units
3. Replacement of demolished units
4. Construction of units for older individuals and persons with disabilities
5. Construction family units
6. Construction of units for the homeless population

An additional downtown housing study (Zimmerman-Volk) outlines the need for additional housing units specifically located in the downtown core.

The City of Jackson is still actively demolishing blighted properties, though at a rate far less than in previous years. Land acquisition efforts has also significantly slowed, with a current push for

development of existing vacant parcels into affordable and market-rate units. The City is strategically acquiring vacant parcels through the tax foreclosure / right-of-first-refusal process, and donations of vacant property from current owners. Recognizing the valuable commodity that is land, City leaders are working to leverage public and private resources to maximize current land holdings to create attractive development opportunities for small and large-scale developers.

Median gross rents continue to increase, and the number of subsidized housing units and Housing Choice Vouchers are insufficient for the number of households requiring affordable housing. Worse yet, some landlords are reluctant to rent to tenants holding vouchers even though doing so is a violation of the City's Fair Housing Ordinance. Additional housing is needed at all income levels and in all categories, including both owner and non-owner-occupied units. Jackson's population is expected to increase slightly from now until 2032, with an expected average future household size of 2.4 persons. The rehabilitation and construction of single-family homes and multi-story and/or multi-unit structures will be needed to address the current and projected future housing shortage.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

According to the 2020 ACS, the data HUD used to pre-populate this Consolidated Plan, Jackson has a total of 15,574 housing units, 86.5% of which are occupied (13,467 housing units). Jackson is primarily comprised of residential structures on small lots with over 65% of its housing stock built before 1940. Over two-thirds (66%) of the City’s housing stock is detached or attached single family homes followed by two (2) to four (4) unit residential structures (17%). Many of the two (2) to four (4) unit residential properties were not originally intended for multi-family use; however, real estate investors have acquired tax foreclosed or low sale price properties in past years and subdivided the single family home to accommodate multiple families. Fifteen (15%) percent of housing units in the City are located in apartment complexes or extremely large homes subdivided into multiple units.

The average household size for the City of Jackson is 2.39 persons per housing unit (32,251 total population / 13,467 occupied housing units); however, 2,230 residents report living alone. Deducting the number of single person households from the total units and total population increases the average number of persons per housing unit to 2.87. The 2020 ACS Table DP04 – Selected Housing Characteristics indicates the average household size of owner-occupied units is 2.54 while the average household size of renter-occupied units is 2.09.

All residential properties by number of units

Property Type	Number	Percent
1-unit detached structure	10,295	66%
1-unit, attached structure	255	2%
2-4 units	2,620	17%
5-19 units	1,055	7%
20 or more units	1,215	8%
Mobile Home, boat, RV, van, etc.	130	1%
Total	15,570	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	Percent	Number	Percent
No bedroom	10	0%	250	4%
1 bedroom	80	1%	1,690	28%
2 bedrooms	1,880	25%	2,495	41%
3 or more bedrooms	5,465	73%	1,595	26%
Total	7,435	99%	6,030	99%

Table 28 – Unit Size by Tenure

Data Source: 2016-2020 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Of the City's total housing units, 7.5% are subsidized and account for approximately 50% of Jackson County's subsidized housing. The Jackson Housing Commission (JHC) is the City's public housing authority which administers 540 housing units across three (3) Asset Management Projects (Reed Manor, Chalet Terrace, and Shahan-Blackstone North). Fourteen (14) Shahan-Blackstone housing units and 26 Chalet Terrace housing units are scattered site single-family homes.

As previously noted, Community Action Agency (CAA) and Training and Treatment Innovations (TTI) administer a total of 66 beds in Permanent Supportive Housing. To be eligible, participant preference is serving chronically homeless, homeless, households with at least one (1) disabled person, and/or severe mental illness. In addition, over 600 housing units receive State of Michigan or HUD subsidies.

The JHC also administers up to 475 Housing Choice Vouchers allowing low-income households to select their housing of choice through the private market. CAA administers approximately 370 additional Housing Choice Vouchers through the State of Michigan.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Jackson does not anticipate losing any units from the affordable housing inventory except for units that may require condemnation because they are unfit for human habitation. The JHC is working with HUD on a possible Rental Assistance Demonstration (RAD) conversion, which will change the type of federal housing assistance from public housing to project-based vouchers. The RAD conversion would also allow the JHC to obtain other funding sources such as LITHC or state/local grants to repair their properties. The JHC is also considering the sale of their scattered-site housing, with preference given to current tenants. No final plans are in place at the writing of this report.

Mentioned earlier in this Consolidated Plan is the addition of affordable housing units currently under construction:

- **The Greenwood** - \$15.6 million mixed-use project with 51 workforce apartments on upper floors. This project also received LIHTCs from the State of Michigan (under construction)
- **The Blackstone** – \$14.8 million project with 52 workforce apartments and a community room, fitness center, and daycare facility. This project also received LIHTCs from the State of Michigan (under construction)
- **Allen Edwin Homes** – Single-family rental homes under construction throughout the City (scattered-site infill development), marketed to families under 120% of the AMI or less. This project is a City payment-in-lieu-of-taxes (PILOT) project (some completed, some under construction, additional units planned for the future)
- **VMG Homes** – single-family homes and duplexes under construction in the City's Health District (under construction, additional units planned for the future)
- **100 Homes Program** – single-family homes under construction through the City (scattered-site infill development), supplemented with down-payment assistance for qualified buyers earning at or below 120% AMI. This project is funded with American Rescue Plan Act (ARPA) dollars (under construction, additional units planned for the future)
- **Transitional Homeless Housing** – single-family homes to be constructed for families/individuals suffering the effects of homelessness. This project is funded through the HOME-ARP program (Summer 2025 anticipated start date)

- **Visitable Homes** – single-family homes to be construction for families/individuals with disabilities. This project is funded through the MICH Program, Michigan State Housing Development Authority (MSHDA), for families earning at or below 60% AMI (Spring 2025 anticipated start date)

Does the availability of housing units meet the needs of the population?

Between 2020 and 2024, 109 residential structures containing 150 housing units were demolished in the City of Jackson due to unsafe and unsanitary conditions. These homes were either destroyed by fire or rendered uninhabitable due to neglected maintenance. The potential to renovate these homes was deemed cost prohibitive. The City has approximately 50 condemned structures but insufficient funds to demolish them except in instances of posing a severe threat to public health and safety, such as after a fire.

To determine if there are sufficient housing units to meet the needs of the population, the total population (32,250) is divided by the average household size (2.39) which estimates 13,494 housing units are needed. The 2020 Census reported 14,163 housing units; deducting 150 units demolished, the available housing stock is approximately 14,013. The 2020 Census also indicated 1,436 housing units (10.1%) as being vacant. Not all of these vacant housing units are in a condition to be inhabited due to age, length of vacancy, and unaffordability. Numerous construction projects are ongoing and/or planned, all working toward the previously-stated goal of adding 1,500 new units and rehabilitating 3,000 existing units by 2032.

Describe the need for specific types of housing:

Conversations with local housing providers reveal affordable housing in Jackson may not necessarily be limited to a specific type of housing but rather addressing the issues that interfere with obtaining housing. Examples of barriers include, but are not limited to, the following:

- Educating landlords about the laws governing rental housing, including Fair Housing laws and prohibited discriminatory practices.
- Educating tenants about their rights as it pertains to rental housing, including Fair Housing laws and awareness of discriminatory practices.
- Exorbitant security deposits, non-refundable application fees, and unaffordable deposits for water accounts.
- Limited public transportation options.
- Poor credit history, especially for youth just out of college or persons facing unexpected life issues.

The CoC has considered hiring landlord advocate to guide landlords through the housing subsidy process with anticipated outcomes of increasing acceptance of rental subsidies and decreasing evictions. Another concept to increase acceptance of tenants with Housing Choice Vouchers is to establish a fund to assist the private-market landlord with repairing potential damages incurred when accepting an irresponsible Section 8 tenant.

Additional housing is needed at all income levels and in all categories, including both owner and non-owner-occupied units. It is important that a healthy housing market should maintain a mix of owner and non-owner-occupied properties, and work toward that end continues in the City of Jackson. Specific needs identified under these two categories included:

1. Rehabilitation of aging housing stock
2. Rehabilitation of vacant units
3. Replacement of demolished units
4. Construction of units for older individuals and persons with disabilities
5. Construction family units
6. Construction of units for the homeless population

Discussion

Rapidly increasing rents have resulted in housing units not affordable to low-income households. In the time period since the City's last 5-Year Consolidated Plan was submitted, median gross rent in the City increased nearly 12% between the 2015 ACS 5-Year Estimates and 2020 ACS 5-Year Estimates. While the residual effects from the COVID-19 pandemic may not be fully realized until 2025, this writer chose to also compare gross rents in the current 2022 ACS 5-Year Estimates. In the 2015 ACS, gross rents were listed as \$652; the 2020 ACS lists gross rents as \$729 (11.8% increase). In the 2022 ACS, gross rents climbed to \$838 – an increase of 15% in two years and 28.5% since 2015. Local housing providers report landlords are often jaded and unwilling to accept tenants with Housing Choice Vouchers believing they are dirty, drug users, violent, etc. Some landlords are more apt to allow a Section 8 tenant if they know the tenant has a case manager but those landlords may not necessarily be responsible – they only have an open unit. Another barrier experienced by low-income tenants is being unable to get utilities in their name and/or paying security and water deposits.

While the City's Fair Housing ordinance includes protected classes beyond those identified at the federal level, discriminatory practices are often not pursued legally. Tenants are usually in "survival mode" and are more interested in obtaining housing than proceeding with legal action. The process is intimidating, takes time, and is not clear cut. Oftentimes a discriminatory practice may be the underlying issue but housing is denied for minor legitimate reasons making prosecution especially difficult.

Housing in the surrounding townships is generally less affordable and less accessible due to lack of public transportation. Low-income renters generally gravitate toward housing within the City even though only one full grocery store is in the City; public transportation is available far enough past the City's jurisdictional boundaries to allow shopping at superstores such as Walmart and Meijer. Unfortunately, the surrounding townships do not want to contribute to the cost of public transportation so if a business such as Meijer in Blackman Township wants to be on the bus line, it must pay the Jackson Area Transportation Authority for that privilege.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

According to the 2020 ACS, the median owner-occupied home value in the City of Jackson is \$71,400 which is over 50% lower than the median value of Jackson County owner-occupied homes (\$138,900). By comparison, the median owner-occupied home value in the State of Michigan is \$162,600 and across the United States it is \$229,800.

The National Low Income Housing Coalition prepares a report entitled “Out of Reach” which documents the gap between renters’ wages and the cost of rental housing. The report’s central statistic, the Housing Wage, is an estimate of the hourly wage a full-time worker must earn to afford a modest rental home at HUD’s Fair Market Rent (FMR) without spending more than 30% of his or her income. Michigan’s minimum wage increased from \$10.33 to \$12.48 on February 21, 2025. Even with this nearly 21% increase, renters would need to work 55 hours a week to afford a modest one-bedroom apartment at FMR. The amount to afford more bedrooms increases as follows:

- 1 bedroom 67 hours/week or 1.7 full time jobs at minimum wage
- 2 bedrooms 79 hours/week or 2.0 full time jobs at minimum wage
- 3 bedrooms 105 hours/week or 2.6 full time jobs at minimum wage
- 4 bedrooms 119 hours/week or 3.0 full time jobs at minimum wage

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	62,500	71,400	14%
Median Contract Rent	534	612	15%

Table 29 – Cost of Housing

*Please note: base year calculations in the chart above appear to reflect 2015 numbers. However, table heading is auto-populated by HUD and, as such, this report shall reflect that heading (2009).

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	Percent
Less than \$500	1,925	32.0%
\$500-999	3,965	65.8%
\$1,000-1,499	130	2.2%
\$1,500-1,999	10	0.2%
\$2,000 or more	0	0.0%
Total	6,030	100.1%

Table 30 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	980	No Data
50% HAMFI	3,045	1,830
80% HAMFI	5,170	3,630
100% HAMFI	No Data	4,670
Total	9,195	10,130

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	686	833	985	1,310	1,488
High HOME Rent	614	660	807	1,031	1,134
Low HOME Rent	566	606	727	840	937

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Overall, with 15,574 housing units existing in the City of Jackson and 13,465 households, on the surface it appears there is sufficient housing for households. However, the question lies with the condition of over 2,100 vacant units and whether there is a sufficient number affordable at all income levels. While some vacant units may be habitable with minimal improvements, factors such as how long a unit has been vacant and without utilities, structure condition, efficiency of utilities, etc., make the likelihood occupancy of many units would be cost prohibitive.

The information contained in the Needs Assessment above provides a picture of the lack of units affordable to lower-income households. As a reminder, to be counted as affordable, the household uses 30% or less of its gross income for housing costs.

Extremely low income – Table 6 in section NA-10 indicates there are 3,325 households that are considered extremely low income. Table 35 above indicates only 980 units are considered affordable to this group, leaving a deficit of 2,345 units.

Very low income – Using data provided in the same tables noted above, 2,090 households qualify as very low income; 4,875 units are deemed affordable at this income level.

Low income – 2,955 households are identified at this income level and 8,800 units are considered affordable to this group.

How is affordability of housing likely to change considering changes to home values and/or rents?

Table 33 above indicates homeowner housing values increased 14% while contract rent prices increased 15% between 2009* and the 2020 ACS . Table 34 above demonstrates nearly two-thirds of tenants pay between \$500 and \$999 per month for their unit while 31.9% report paying less than \$500 per month. During the COVID-19 pandemic, media reported rents increased substantially across the nation. That, coupled with the removal over 1,275 housing units since 2012, created a demand for more rental units. Public and private investment beginning in 2020 is replacing those lost units with infill housing.

** Please note: base year calculations in the chart above appear to reflect 2015 numbers. However, table heading is auto-populated by HUD and, as such, this report shall reflect that heading (2009).*

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

A family of four (4) earning 80% of the area median income (\$67,450 for 2024) would find monthly rent (including utilities) of \$1,413 (2024 FMR for a 3-bedroom apartment) affordable based on HUD's definition of paying no more than 30% of gross income for housing costs. Certainly, the less a family earns, the less housing it can afford. The same family of four (4) earning 50% of the area median income (\$42,150) might be able to afford a two-bedroom unit (\$1,074 per month). Depending on the family's composition, two (2) bedrooms may be insufficient and require use of another room, such as a living room, for sleeping arrangements.

Discussion

Having a sufficient number of housing units doesn't always equate to everyone being housed at affordable prices. As noted above, the community must also address barriers to affordable housing, such as veiled discriminatory practices and landlords unwilling to lease to tenants with housing vouchers. As with any other community, there are limited financial resources available to non-profits, faith-based organizations, and even local governments; no one entity should be expected to bear the full brunt of community needs but work together and support each other's efforts.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

To meet the needs of a fast-growing community in the early- to mid-20th century, housing developed as quickly as the population grew. The 1960 Census records the largest number of housing units in the City’s history (16,843) with 65.9% owner-occupied, 34.1% renter-occupied, and 4.2% vacant. The subsequent economic downturns and loss of manufacturing jobs depleted the population from a high of 55,187 recorded in the 1930 Census to the 2020 ACS estimate of 32,250, a loss of over 41% of the population. Unfortunately, housing did not follow the same trend, recording a loss of approximately 7.5% from the high recorded in 1960 (16,843) to the 2020 ACS estimate of 15,570 units.

Jackson is primarily comprised of residential structures on small lots. Nearly 55% percent of all homes within the City were built before 1940; 85% were built before 1970. Nine (9) prominent styles typify housing in the City: Bungalow, Dutch Colonial, Colonial Revival, American Foursquare, Gable Front, Tudor Revival, English Cottage, Ranch, and Split-Level Ranch. With such an aged housing stock and decreasing population with skills and income to maintain the properties, a great many fell into significant disrepair. The City has eliminated over 1,250 dilapidated housing units since 2012 and enhanced its non-owner occupied housing inspections to inspect all housing units every three years.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

HUD requires all jurisdictions, including the City of Jackson, to define what “standard condition” and “substandard condition but suitable for rehabilitation” mean as it relates to its rehabilitation programs, which is listed below:

Standard Condition means a dwelling that essentially meets all federal, state, and local code, but may have minor aesthetic-type violations.

Substandard Condition but Suitable for Rehabilitation means there must be a reasonable expectation that with appropriate maintenance, the assisted property will remain structurally sound and fit for habitation for ten (10) years following rehabilitation assistance. When one (1) or more major and/or structural defect exists, the property may still be suitable for rehabilitation if costs to repair are reasonable.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	1,395	19%	2,850	47%
With two selected Conditions	4	0%	90	1%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	6,040	81%	3,085	51%
Total	7,439	100%	6,025	99%

Table 33 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	270	4%	125	2%
1980-1999	160	2%	860	14%
1950-1979	1,605	22%	1,835	30%
Before 1950	5,410	73%	3,205	53%
Total	7,445	101%	6,025	99%

Table 34 – Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	7,015	94%	5,040	84%
Housing Units build before 1980 with children present	340	5%	105	2%

Table 35 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Need for Owner and Rental Rehabilitation

Over half of the City's total housing stock was built before 1940 when Jackson was prosperous and growing rapidly; these homes are now no less than 85 years old. During the subsequent three (3) decades, between 1940 and 1969, demand for new housing continued to grow at a slightly slower pace when manufacturing jobs were plenty; 35% of the City's housing stock was built during these years. The creation of new housing in the City continued to decrease at the end of the 20th century and into the early 21st century.

Noted previously, while the cost of living, including housing costs, climb, Jackson's median household income decreased over 10% in the past decade while persons living below the federal poverty level have nearly doubled. The 2024 Low-Mod Income Summary Data (LMISD), which is also based off the 2020 ACS, indicates that 60.8% of City residents are low-income. The City exhibits extremes of this percentage depending on where a person lives from a low of 25.75% low-income residents in the area bordered by

Michigan–West–Carlton–Brown (Census Tract 8) to a high of 86.13% low-income residents in the downtown urban core (Census Tract 6).

Due to the age of the majority of homes in the City of Jackson and preponderance of low- to moderate-income residents lacking skills and income to invest in home improvements, many low-income homeowners require assistance to keep their home habitable. Years of deferred maintenance and sometimes neglect causes full rehabilitation costs to skyrocket and making it difficult to assist enough homeowners to have an impact on the community.

Due to rising construction costs, full rehabilitations are no longer being offered. In its place is a partial rehab program based on replacing major components, some of the more expensive maintenance costs a homeowner would face. Under this program, major component items that are nearing the end of their life cycle (i.e., furnace, roof, water heater) before they fail or increase energy efficiency to reduce utility costs for the family, thereby increasing the amount of monthly income that could be spent for other life necessities.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The 2020 ACS data used by HUD to prepopulate most tables in this Consolidated Plan estimates 89.5% of the City of Jackson’s housing stock was built before 1980. The 2020 ACS Table S1701 also estimates 24.1% of City residents live below the federal poverty level; the younger a person is, the more likely they live in poverty as 39.1% of children under 5 years old and 26.3% of children aged 5 to 17 years old live below the poverty level. Table S0901: Children Characteristics from the 2020 ACS reports there are 2,693 children under 6 years old living within the City limits; if 39.1% of that age group lives in poverty, over 1,053 children under 6 years old likely live in a home with lead based paint.

HUD’s 2024 Low and Moderate Income Summary Data (LMISD) table indicates 60.8% of City of Jackson residents earn 80% of the Area Median Income or less. The number of housing units built before 1979 is approximately 13,470 which equates to approximately 8,190 housing units with lead-based paint hazards are occupied by low- or moderate-income families.

Discussion

The City of Jackson does not specifically collect data on the number of vacant units or suitability for rehabilitation. Jackson does maintain a Foreclosed, Vacant, or Abandoned (FVA) Residential Property Registry with 110 housing units registered as of January 30, 2025. Many of these properties are in the mortgage foreclosure process and likely suitable for rehabilitation.

Also as of January 30, 2025, there are 42 condemned privately owned residential structures. In addition, the City currently owns one (1) condemned residential property it acquired through tax reversion in 2022. City inspectors carefully examine the feasibility of rehabilitation versus demolition and, if appropriate, the City may enter a development agreement with the owner or a purchaser of a condemned property to ensure it is brought up to code. There are currently 10 such agreements in place.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Jackson Housing Commission (JHC) administers subsidized housing programs that offer affordable housing to extremely low-income individuals and families in Jackson. Public housing provides subsidized, affordable rental units at one of three (3) apartment complexes; vouchers allow an individual or family to seek housing in the private market, giving the voucher holder flexibility in where to live. Additional assisted housing is available in the community in various forms and locations which is not under the purview of the JHC.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			543	475			0	0	0
# of accessible units									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

The JHC is a medium-sized public housing commission that administers three (3) Asset Management Projects (AMP) within the City of Jackson as follows:

Chalet Terrace – 100 Units; Constructed: 1965; Target Population: Mixed
(8) efficiency, (24) 1-bedroom, (20) 2-bedroom, (34) 3-bedroom, (14) 4-bedroom

Chalet Terrace – Scattered Site; Constructed: 1992; Target Population: Family
(26) 3-bedroom single family homes

Reed Manor – 292 Units; Constructed: 1970; Target Population: Elderly and Disabled
(196) efficiency, (84) 1-bedroom, (12) 2-bedroom

Shahan-Blackstone North – 108 Units; Constructed: 1980; Target Population: Family
(108) efficiency, (74) 2-bedroom, (30) 3-bedroom, (4) 4-bedroom

Shahan-Blackstone North – Scattered Site; Constructed: 1992; Target Population: Family
(14) 3-bedroom single family homes

Pursuant to its regulations, HUD assesses the physical condition of all HUD-related public housing. City housing inspectors also visit and inspect each unit every two (2) years to ensure they are maintained in a safe and sanitary manner and that any code violations cited are rectified in an appropriate and timely manner.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan: Public Housing Condition

Public Housing Development	Average Inspection Score
Chalet Terrace	41.0
Reed Manor	51.0
Shahan-Blackstone North	41.0

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The JHC has maintained its aging and obsolete public housing units as best as it has been able to with the dwindling Capital Improvement Funds received from HUD. With little other funding resources available to it, especially unrestricted funds, the units have been deteriorating faster than can be maintained. Hired in 2024, the Executive Director, Arturo Puckerin, has spent the last 12+ months working with the JHC board, staff, and residents of various properties to address aging systems. Inspection scores for all JHC properties saw a significant drop from 2019 – 2024. JHC’s “troubled” HUD status creates another barrier to accessing funding and making the necessary short-term improvements and long-term investments in its various properties.

The JHC is working to secure additional HUD funds for the continued short and long-term maintenance needs of its various properties. In addition, the City of Jackson (via a State Allocation Grant from Senator Sue Shink) is providing a grant of \$300,000 to assist JHC with facilities upgrades across all properties. These funds must be expended by September 30, 2026.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

In addition to the various grants mentioned above, the JHC has cultivated a strong connection with community partner agencies to provide case management, homeownership training, life skills, and financial and economic management, health screenings, legal services, and many other available social services depending on individual needs. New positions were integrated into the JHC staff specifically to address the many needs of residents without having to devote time toward the general administration of the programs. One staff position provides case management focusing on housing stability issues and assisting residents to remain stably housed through various means such as entering a payment plan or appointing a payee to keep rent payments current, or acting as mediator for neighbor disputes. Essentially, this position assists the resident to resolve any issue that would normally lead to an eviction. The other position provides healthcare case management which ensures a resident's healthcare needs are met, whether it is transporting them to/from appointments or scheduling those appointments. A physician's assistant provides weekly on-site services for minor medical issues.

In collaboration with CAA, HeadStart programs are available on-site at Chalet Terrace and Shahan-Blackstone North which are the two complexes that house families. Each location has a community room for residents to gather and engage with each other; one location even provides daily lunch meals to approximately 50 residents. Security has been a recurring resident concern and has attempted to be addressed through various means including the installation of flock cameras and hiring security services from an outside source.

Finally, the JHC applied for and received funds through the Choice Neighborhoods Program for a planning grant. These funds were used to assess current and future needs, and to develop a plan for significant renovations/new construction in the future. Plans to apply for the larger implementation grant have been put on hold due to staffing and HUD constraints, but this application may be pursued in the future.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

In 1994, HUD encouraged communities to address the problems of housing and homelessness in a coordinated, comprehensive, and strategic fashion. In response, an ad hoc committee of Jackson community agencies was formed to address the needs required to maintain and expand affordable housing in Jackson. From that committee, the Jackson County Continuum of Care (CoC) formed and for the past 26 years has expanded its membership and improved the way the homeless receive services by enhancing collaboration and communication among the various community service providers and stakeholders with a commitment to reduce, alleviate, and end homelessness. The CoC Steering Committee and several subcommittees help guide local policy related to homelessness, ensure an effective understanding of HUD regulations and policy, and work toward improving system performance.

The CoC receives both federal and state funding to support and sustain those objectives and local service providers. Case managers guide people experiencing homelessness toward the multitude of community resources through an individualized intake process and connecting them to programs best suited to their unique situation.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	62	0	0	44	0
Households with Only Adults	58	0	0	32	0
Chronically Homeless Households	0	0	0	66	0
Veterans	0	0	0	0	0
Unaccompanied Youth	14	0	0	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The local Community Action Agency (CAA) is the lead agency and fiscal agent for the CoC and provides many of the services addressing homeless needs. CoC membership is comprised of representatives from the Jackson Housing Commission, Henry Ford Allegiance Health, Legal Services, Training and Treatment Innovations, Jackson Interfaith Shelter, disAbility Connections, and AWARE Shelter, among others. The CoC has adopted a “Coordinated Entry System” with a “Housing First” component so people are housed quickly without preconditions or service participation requirements.

A designated Housing Assessment and Resource Agency is the primary access point for all homeless persons or those at risk of becoming homeless who are also able to be initially assessed through other avenues, such as emergency shelters, domestic violence shelters, veterans' providers, etc. The CoC uses the same assessment tool at all access points with criteria modifications for specific subpopulations, namely the Service Prioritization Decision Assistance Tool. The Tool determines each household's housing and service needs, but also prioritizes households for housing program referrals for permanent supportive housing, rapid re-housing, or supportive services only.

Residents in Action, a local "boots on the ground" nonprofit, is in the process of acquiring the former T.A. Wilson school, for conversion to a formal homeless shelter. RIA is currently leasing a portion of the facility, offering overnight space for homeless individuals and families. 10 Pallet shelters were purchased in 2023, and were used during the winter of 2024 at the T.A. Wilson site. Each shelter can hold two (2) people), for a maximum of 20 possible beds when utilizing these temporary shelters. The pallet shelters are currently in storage for possible use at a later date. The Jackson Interfaith Shelter will soon begin construction on an additional homeless facility near their current location just South of downtown. The City is partnering with two local housing nonprofit agencies (The Welcome Home Organization and Kings Community Homes), for the creation of homeless transitionally housing for qualifying populations with funds from the HOME-ARP program.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

- *Jackson Interfaith Shelter*: 46 family beds, 32 adult only beds, 10 overflow beds.
- *AWARE, Inc*: 22 family beds, 8 adult only beds specifically for survivors of domestic violence.
- T.A. Wilson (Residents in Action): 30 beds, flexible use depending on adult/family needs
- *Region 2 Area Agency on Aging*: 7 motel vouchers
- *Permanent Supportive Housing*: 67 family beds, 36 adult only beds for chronically homeless; 4 veteran beds.
- *Rapid Re-Housing*: 45 family beds, 31 adult only beds, 30 veteran beds.
- Community Action Agency: Supportive Services for Veteran Families (SSVF)

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

City of Jackson staff participates with the Jackson County Continuum of Care (CoC) which focuses not only on the homeless population, but also on housing needs and services for low-income households and special needs populations. The Housing Assessment Resource Agency (HARA) screens clients to determine the appropriate housing interventions. Through the "no wrong door" approach, though, the screening can be accomplished by another agency and coordinated through the HARA. The assessment tool quickly evaluates the health and social needs of those experiencing, or at risk of, homelessness to help identify the best type of support and housing intervention by relying on three (3) categories of recommendation:

- *Permanent Supportive Housing* - individuals or families who need permanent housing with ongoing access to services and case management to remain stably housed;
- *Rapid Re-Housing* - individuals or families who are likely to achieve housing stability over a short period of time through a medium or short term rent subsidy and access to support services;
- *Diversion* - individuals or families who do not require intensive supports but may still benefit from access to affordable housing with some light touch services. In these cases, the assessment tool recommends affordable or subsidized housing but no financial assistance.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

It is difficult to identify the exact number of units needed for supportive housing due to the dynamic nature of disabilities, addictions, or needs. Some individuals who would benefit from supportive housing live with family members, thereby making it challenging to capture the true need. The number of supportive housing options available in the Jackson community are numerous and too many to list. The Jackson Health Network (JHN) is a collaboration between health care leaders, community leaders, and physicians working together to improve patient outcomes and safety, and reduce overall costs through an integrated system of care. The JHN has published a 21 page Community Resource Directory which is available online at <https://www.jacksonhealthnetwork.org/content/98-education>.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The CoC has developed coordinated entry and discharge accountability, discharge protocols, and identified coordinated discharge providers. Those seeking housing are individually assessed to identify the level of housing assistance needed and provided case management. The case manager connects the individual or household to needed community services or other resources.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Increasing project costs and stagnant CDBG funds received annually from HUD leaves little to no funding for housing and supportive services activities beyond what the City itself is able to provide. The area's non-profit and faith-based organizations rely on other grants and fundraising opportunities to finance

their activities. The City will continue to review community needs and determine if it is able to financially support activities on an annual basis.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Increasing project costs and stagnant CDBG funds received annually from HUD leaves little to no funding for housing and supportive services activities beyond what the City itself is able to provide. The area's non-profit and faith-based organizations rely on other grants and fundraising opportunities to finance their activities. The City will continue to review community needs and determine if it is able to financially support activities on an annual basis.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Jackson does not intentionally create policies, codes, or rules that create barriers to affordable housing, but rather faces the same realities experienced by most municipalities – increasing construction costs, complexity of financing for larger projects, and an affordability gap between incomes and housing costs. Likewise, most policies, ordinances, and/or codes are established to maintain compliance with local, state, and federal guidelines or for health and safety reasons. The City’s Community Development Department handles all applications for permitting, tax incentives, and inspections of for new construction and rehabilitation projects. Staff have spent the past few years analyzing systems, removing bureaucratic red tape, streamlining procedures, and making the entire process simpler and more efficient for developers and staff. Builders/developers from across the state and beyond are now coming to Jackson to develop new single and multi-family properties due to the removal of these barriers.

Conversations with local housing providers reveals affordable housing in Jackson may not necessarily be limited to a specific type of housing but rather addressing the issues that interfere with obtaining housing. Examples of barriers include, but are not limited to, the following:

- Landlords unaware of the laws governing rental housing, including Fair Housing laws and prohibited discriminatory practices.
- Tenants who do not realize their rights as it pertains to rental housing, including Fair Housing laws and awareness of discriminatory practices.
- Exorbitant security deposits, non-refundable application fees, and unaffordable deposits for utilities.
- Inability to obtain utilities in tenant’s name.
- Limited public transportation options.
- Poor credit history, especially for youth just out of college, persons facing unexpected life issues, or ruined as part of a domestic violence situation.
- Rejection of service animals in the unit.
- Refusal to accept Housing Choice Vouchers or charging rents that don’t qualify for fair market rent.
- People who are routinely discriminated against often don’t notice or identify discrimination. If discrimination is suspected, the tenants are often more interested in finding housing to meet their immediate need rather than going through a lengthy appeal process.

One possible way to increase the acceptance of tenants with Housing Choice Vouchers is to establish a fund to assist the private-market landlord with repairing potential damages incurred when accepting an irresponsible Section 8 tenant.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

As part of the 2016 Community Master Plan, real estate analyst firm Land Use USA assessed the City's economy and outlined areas for future economic development initiatives. Major employers within the City of Jackson include Henry Ford Allegiance Health, Consumers Energy, Great Lakes Home Health Hospice, Eaton Corporation, Alro Steel, City, State and County government, and others. Jackson's market strengths are in metal manufacturing, health care, and utilities; the economic consultants at Land Use USA recommended the City focus on growing sectors which are complementary to these existing strengths. Such sectors include, but are not limited to:

- Finance, insurance
- Medical supplies manufacturing
- Related life sciences industries
- Information technologies
- Advanced distribution technologies
- Renewable energies
- Other scientific, technical industries
- Plastics, rubber, vinyl products
- Chemicals and adhesives

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers (%)	Share of Jobs (%)	Jobs less workers (%)
Agriculture, Mining, Oil & Gas Extraction	31	1	0	0	0
Arts, Entertainment, Accommodations	1,433	1,203	12	5	-7
Construction	397	250	3	1	-2
Education and Health Care Services	2,212	6,419	19	27	8
Finance, Insurance, and Real Estate	483	1,004	4	4	0
Information	131	138	1	1	-1
Manufacturing	2,315	2,105	20	9	-11

Business by Sector	Number of Workers	Number of Jobs	Share of Workers (%)	Share of Jobs (%)	Jobs less workers (%)
Other Services	494	1,008	4	4	0
Professional, Scientific, Management Services	664	1,452	6	6	0
Public Administration	0	0	0	0	0
Retail Trade	1,387	1,754	12	7	-5
Transportation and Warehousing	248	450	2	2	0
Wholesale Trade	342	699	3	3	0
Total	10,137	16,483	--	--	--

Table 40 - Business Activity

Data Source: 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	15,675
Civilian Employed Population 16 years and over	14,065
Unemployment Rate	10.33
Unemployment Rate for Ages 16-24	23.24
Unemployment Rate for Ages 25-65	6.79

Table 41 - Labor Force

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	1,940
Farming, fisheries and forestry occupations	450
Service	2,335
Sales and office	3,060
Construction, extraction, maintenance and repair	1,045
Production, transportation and material moving	1,300

Table 42 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes		
30-59 Minutes		
60 or More Minutes		
Total		

Table 43 - Travel Time

Data Source: 2016-2020 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	885	175	1,150
High school graduate (includes equivalency)	3,610	530	2,030
Some college or Associate's degree	4,540	440	1,475
Bachelor's degree or higher	2,360	40	300

Table 44 - Educational Attainment by Employment Status

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	4	120	35	150	265
9th to 12th grade, no diploma	575	605	365	940	275
High school graduate, GED, or alternative	1,285	1,840	1,100	3,230	1,175
Some college, no degree	1,045	1,215	1,250	2,510	865
Associate's degree	115	305	435	735	300
Bachelor's degree	35	680	540	735	395
Graduate or professional degree	4	170	160	415	280

Table 45 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$18,103
High school graduate (includes equivalency)	\$26,332
Some college or Associate’s degree	\$29,705
Bachelor’s degree	\$35,481
Graduate or professional degree	\$54,861

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The top four (4) industry categories for employed City residents remain unchanged since the 2000 Census. According to the 2020 ACS Table DP03 – Selected Economic Characteristics, 22.7% of jobs were in education and health care services; 17.9% in manufacturing; 13.9% in retail trade; and 11.2% in arts, entertainment, recreation, accommodation and food services. According to Jackson’s 2016 Community Master Plan, major employment sectors within and immediately adjacent to the City of Jackson are as follows (ranked in order): Healthcare; Utilities, Media, Business Services; Steel, Metal, and/or Auto Parts; Retail Trade; Education; Department of Corrections; Food Products; Government; Plastics, Vinyl, Adhesives; Construction; and Medical Devices.

Describe the workforce and infrastructure needs of the business community:

Jackson’s 2016 Community Master Plan relays that over half the jobs in Jackson County are located within the City of Jackson, but City residents fill only 13% of those jobs. This means approximately 26,000 residents of other communities earn their livelihoods within the City’s limits, indicating that the majority of the prosperity generated within the City is being exported outside its boundaries. Demographic comparisons for the City and County indicate households with higher educational attainment, higher median income, and higher median housing values reside outside the municipal limits of the City.

Public transportation limitations continue to plague low-income job seekers and employees as the Jackson Area Transportation Authority's (JATA) general service hours for bus service are Monday – Friday 6:15 a.m. to 6:15 p.m., Saturday 10:15 a.m. to 6:15 p.m., and no Sunday service unless through Reserve-A-Ride. JATA's service area is generally confined to the City limits except for very limited routes to Jackson College (runs from 7:20 a.m. with last pick up at college at 9:15 p.m.), Michigan Center (very limited morning and afternoon runs), and just west of the City in Summit and Blackman Townships for access to the Westwood Mall and Meijer areas.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

In recent years, growth in the City of Jackson includes, but is not limited to:

- Expansion of Henry Ford Allegiance Health and complementary off campus medical facilities
- Construction of several new mixed-use buildings and adaptive re-use of existing structures in the downtown district
- Expansion of retail and restaurant options in the downtown
- Construction of numerous multi-story/multi-unit affordable and market rate housing structures in the downtown
- Renovation of the Jackson Crossing mall, including the addition of numerous new commercial/retail tenants
- Construction of numerous fast-food restaurants in the West Avenue corridor
- Construction of many single-family homes, utilizing federal and private dollars
- Demolition of an aging and abandoned movie theater, to make way for future commercial development
- Passage of an \$80 million bond for the Jackson Public Schools, with investments in technology, safety/security, classroom space, and athletic facilities to each JPS building and the construction of a new elementary school
- Conversion of a former elementary school into a hub for the Jackson Intermediate School District (ISD)

Coinciding with the growth have been infrastructure improvements, most notably the I-94 corridor improvement project. This multi-million dollar highway project replaced bridges/overpasses, created additional traffic lanes, and reconfigured numerous highway exits. Other improvements include the addition of several roundabouts to maintain traffic flow in formerly congested areas and the replacement of traffic light signals and mast arms. Albeit aged, the City's water and sewer capacity is sufficient to absorb the growth; work is ongoing to replace the oldest water and sewer lines in conjunction with residential street reconstruction.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Jackson County participates in the Region 2 Planning Commission Comprehensive Economic Development Strategy (CEDS) along with Hillsdale and Lenawee Counties in south-central lower Michigan. The 2021-2025 CEDS Plan listed four strategies . . .

- Encourage responsible growth in interconnected areas within the region that have a critical mass of population, supportive infrastructure, and basic quality of life amenities, while also

being fiscally sustainable, where revenues and expenses are balanced and sustainable for households, communities, and the region.

- Coordinate transportation, infrastructure, and land-use decisions to enhance regional residents' access to jobs and educational opportunities and employer's access to workforce and customers.
- Maintain quality of life elements that attract skilled labor by encouraging and highlighting walkable cities, towns, and villages, downtown development and revitalization, arts and culture, outdoor recreation, and open space preservation.
- Support and encourage economic diversity in business retention, job creation, workforce development, and innovation through partnering and information sharing.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Enterprise Group and Jackson County Chamber of Commerce work jointly toward the development of programs to enhance the soft skills of junior and senior high school students. There are three (3) institutions of higher learning in Jackson County and 15 additional institutions within one (1) hour of Jackson, including the University of Michigan and Michigan State University. The Jackson Area College and Career Connection is a unique learning program that creates a pathway for Jackson County high school students to simultaneously earn their high school diploma, college credit, a technical/career credential, participation within a school-to-registered apprenticeship, and the opportunity for employment post graduation. The Jackson Area Manufacturers Association partners with South Central Michigan Works! to develop skilled trades. The Academy for Manufacturing Careers is a certified Registered Apprenticeship Program through the US Department of Labor.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The economic development project types that the CEDS Steering Committee endorses throughout the Economic Development District include:

- Commercial, industrial, and entrepreneurial investments
- New/expanding research and development facilities and high-tech industries
- New/expanding education facilities and innovative equipment acquisition
- Public and multi-modal transportation, i.e. roadway network maintenance/improvements, expansion/maintenance of public transportation services, and freight rail/air/port maintenance/improvements
- Investment in energy and renewable energy
- Infrastructure improvements, i.e. waste management and treatment (water, sewer, solid waste, etc.), utility restoration, improvement, and access (including broadband), provision of other municipal services
- Place making, culture, recreation and tourism efforts
- New mixed-use developments
- Business and technology incubator/accelerator

- Agriculture, including value-added processing and the local food movement
- Water/natural resources,
- Education/workforce training
- Increased housing options (e.g., the "missing middle")
- Health care, including medical services and wellness
- Asset mapping

Professional service industries (i.e., engineering, architects, accountants, lawyers, etc.)

Discussion

The City of Jackson is a certified Redevelopment Ready Community (through the Michigan Economic Development Corporation). The City recently completed the RRC certification renewal process, which included the creation of numerous new economic development tools, including:

1. New economic development webpage
2. Updated capital improvements plan
3. New communications plan
4. New marketing plan
5. New economic development strategy

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Concentrations of households with multiple housing problems is defined as any area where the percentage of a household's income is at least 10 percentage points more than the jurisdiction's housing market percentage as a whole.

The Needs Analysis above noted that low-income households are more likely to have multiple housing problems. There are a total of 36 Block Groups among 12 Census Tracts in the City; the entire City is comprised of 61% low-income residents based on the 2024 Low-Mod Income Summary Data (LMISD) published by HUD. The percentage of low-income residents exceeds 71% (10 percentage points above the City as a whole) in 17 Block Groups; of those 17 Block Groups, the percentage of low-income residents is as follows:

71 – 80% low-income	9 Block Groups
81 – 85% low-income	3 Block Groups
86 – 90% low income	3 Block Groups
Over 90% low income	2 Block Groups

The majority of these concentrations of low-income households live in the middle third of the City, including its downtown; two (2) of the Block Groups are immediately adjacent to the middle third of the City.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Concentrations of racial or ethnic populations is defined as any area where the percentage of a particular racial or ethnic group is at least 10 percentage points than the jurisdiction or housing market percentage as a whole.

The City is generally comprised of 65.7% White residents, 21% Black/African American residents, and 6.3% Hispanic or Latino residents. All other racial groups, including mixed races, make up 7% of the total population. Concentrations of Black/African American residents are in Census Tract 10, Census Tract 11, and Census Tract 13 – all basically south of the downtown district. No Census Tract exhibited a concentration, as defined above, of "other races" or persons of Hispanic or Latino culture.

What are the characteristics of the market in these areas/neighborhoods?

A number of barriers exist for residents in the south central section of the City. With higher numbers of low-income and non-white households, there are often disproportionate housing problems such as overcrowding and cost burden, greater public investment and infrastructure needs, and an increased need for police and fire services.

Are there any community assets in these areas/neighborhoods?

Census Tracts 10, 11, and 13 are included in the public transportation's regular routes. While there is no full service grocery store in close proximity to this area, there are several dollar and convenience stores, some of which endeavor to provide fresh produce, plus a number of food pantries. Census Tract 10 and 11, located very close to the downtown business district, have experienced recent growth and continue to offer new amenities and opportunities. An active neighborhood association exists in this area dubbed the "Partnership Park Downtown Neighborhood Association."

Each Census Tract hosts a variety of parks, from a major community center and larger neighborhood parks to small pocket parks. The MLK Diversity Trail traverses through Census Tract 13 and the southeastern portion of Census Tract 11, providing linkages to other schools, churches, parks, trails, transportation options, and similar amenities. Several subsidized housing complexes are also located in this area, including Southridge Park (116 housing units), Kings Community Homes (81 housing units) and Chalet Terrace (126 housing units).

These three (3) Census Tracts suffered the effects of blight and disinvestment for many years and experienced the majority of mortgage foreclosures, tax foreclosures, and demolitions since the recession. A majority of Census Tracts 10 and 11 are included in this Consolidated Plan as areas to target CDBG and HOME funds to the extent possible to begin the rebuilding process through street reconstruction, lighting improvements, and homeowner rehabilitation assistance. New home construction is a big part of Jackson's current rebuilding process, with new single and multi-family structures being constructed in all areas of the City, but with a particular preponderance on Census Tracts 2, 4, 69, 9, 10, 11, and 13.

Are there other strategic opportunities in any of these areas?

City leadership continues to collaborate with community stakeholders to increase opportunities for families and create better neighborhoods. Supporting and linking citizens to education, employment, and training opportunities is critical to ensure disadvantaged residents can increasingly benefit through economic growth.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

HUD requires Consolidated Plans submitted after January 1, 2018 to include an assessment of the availability of broadband access in the community. Research into the subject reveals the level of competition between broadband providers in Jackson is high with households having three (3) or more providers from which to select. The most used service in Jackson is Xfinity from Comcast, which also provides cable television to many households. AT&T, which was the major landline phone company, offers service through both DSL and fiber optics. Other carriers used, to a lesser extent, are EarthLink (DSL), Advanced Communication & Data (DSL), and satellite options such as Viasat and HughesNet.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

As noted above, there are several broadband providers available for selection by City residents.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

In addition to assessing broadband access availability, HUD also requires communities to consider the vulnerability of housing occupied by low- to moderate-income households to increased natural hazards. The Grand River courses through the City of Jackson from its southeast corner, through the east side of downtown, and centrally northward. The area most prone to flooding, according to FEMA flood maps, is from the southeast corner of the City northward to the downtown, mostly in Census Tract 12, Block Group 2. Fortunately, much of this area is industrial except for a small residential portion formerly known as Frog Town.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Block Group 2 of Census Tract 12, which is larger than the Frog Town area and also prone to flooding, has approximately 768 occupied housing units, 41.5% of which are single family, owner occupied homes. According to the Low and Moderate Income Summary Data (LMISD) published by HUD, 59.78% of households are low- to moderate income.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City of Jackson is in the midst of a significant renewal. Coordinated efforts to reinvent the City started nearly fifteen (15) years ago, with a focus on infrastructure, business development, blight reduction, and downtown revitalization. Sewer/water projects, road work, and the demolition of blighted residential and commercial properties was only the beginning. Downtown redevelopment soon followed, including road, sidewalk, and lighting upgrades, the creation of parks and social gathering spaces, place-making efforts, and a significant push for downtown business and residential development. In the ensuing years, investment spread to surrounding neighborhoods and included road, lighting, parks and recreation, and community center upgrades. Home rehabilitation was a source of significant investment, including both complete home remodeling projects and smaller major component work to replace aging systems. Railroad bridges were reconstructed in the downtown core, and highway infrastructure (including pavement, on/off ramps, and) was enhanced along the I-94 in a multi-year, multi-million dollar plan through a partnership with local, state, and federal agencies.

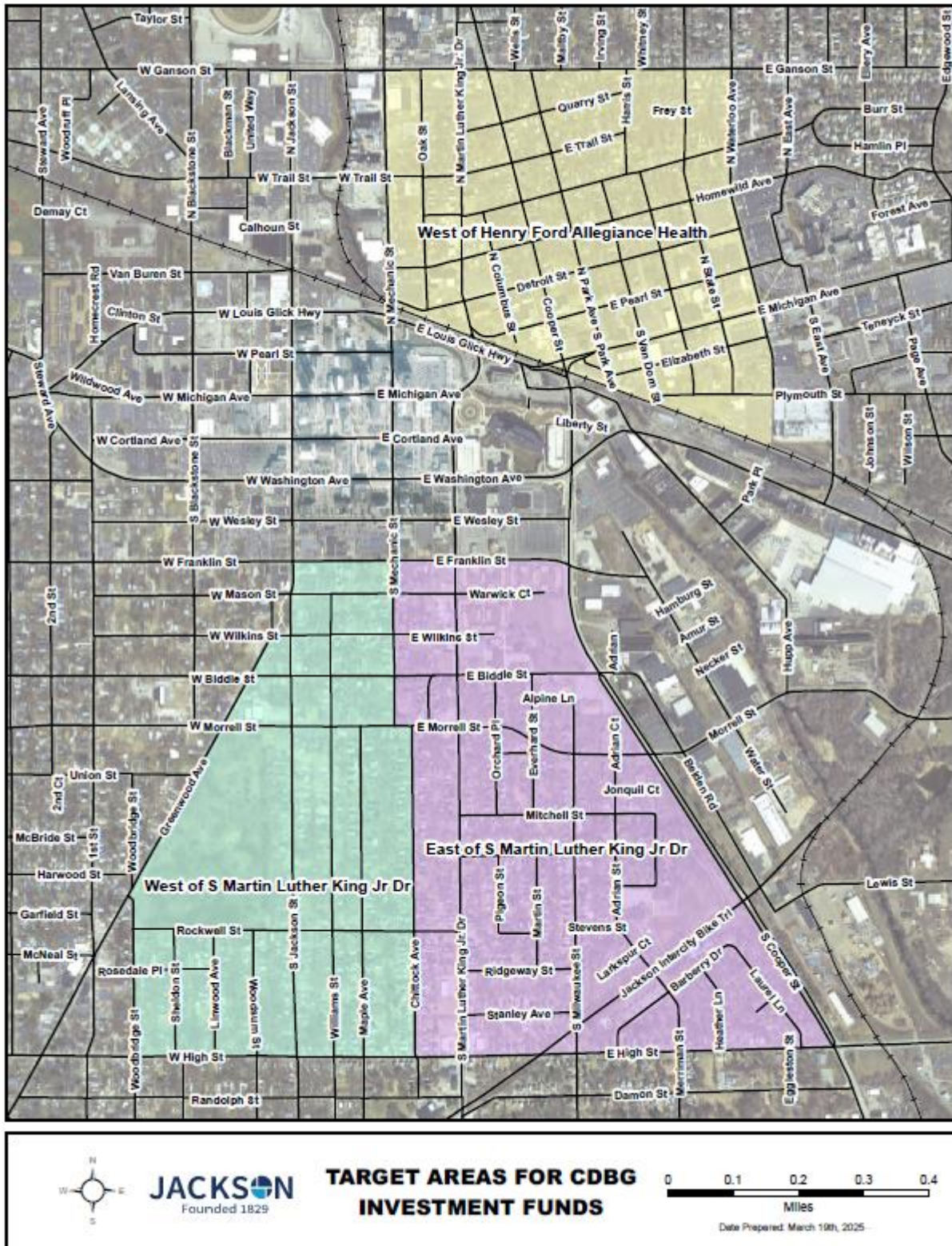
The City of Jackson, like many other communities across the country, is facing a housing shortage of epic proportions. While City leaders have been acutely aware of the multitude of issues related to affordable and quality housing for all Jackson residents, both funding and interested developers have been largely absent from the conversation. The Covid-19 pandemic brought unexpected hardship to scores of families in Jackson—and across the globe. At the same time, local and state governments saw significant increases in grant funding related to affordable housing development. City leaders seized on the opportunity to continue our substantial momentum, turning attention to the issue of affordable and quality housing. This was the next logical piece in the City’s renewal puzzle, and with funding and renewed development interest it is certainly a major focus of the next five (5) years and beyond. Over the next five years, the City of Jackson will focus on:

1. Housing development (new units)
2. Infrastructure improvements (water/sewer lines, roads, sidewalks, and streetlights)
3. Blight reduction (code enforcement and demolition activities)
4. Housing rehabilitation

City leaders and staff are committed to creating a Jackson for everyone, with housing, parks, infrastructure, and amenities in all corners of the City for all persons to enjoy. Leveraging public and private funds from the local, state, and federal levels will help provide the stability and opportunity all current and future Jackson residents need and deserve to be successful over the next five years and beyond. The City of Jackson shall not use grant funds to promote “gender ideology,” as defined in Executive Order (E.O.) 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area



1	Area Name:	West of Henry Ford Allegiance Health
	Area Type:	Local Target area
	% of LMI	70.65% - 80.23% (76.43% average)
	Revitalization Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	<ul style="list-style-type: none"> • North – Ganson St • East – Waterloo Ave • South – railroad tracks • West – Mechanic St
	Include specific housing and commercial characteristics of this target area.	Identified in the 2016 Master Plan as part of the Health and Downtown Neighborhoods, both of which were deemed transitional. This area was also labeled as place-making, forming part of the community’s core and in the top tier for transit and non-motorized connectivity.
	How did your consultation & citizen participation process help you to identify this neighborhood as a target area?	New home construction, existing home rehabilitation, and Specific assistance for LMI families were concerns shared during the public participation process.
	Identify the needs in this target area	Housing, infrastructure, blight reduction
	What are the opportunities for improvement in this target area?	Streetlights, sidewalk repairs, infill housing on vacant lots
	Are there barriers to improvement in this target area?	Lagging private investment and persistent blight

Table 47 - Geographic Priority Areas



2	Area Name:	East of S. Martin Luther King, Jr. Drive
	Area Type:	Local Target area
	% of LMI	74.46%
	Revitalization Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	<ul style="list-style-type: none"> • North – Franklin St • East – Cooper St • South – High St • West – Chittock Ave/Mechanic St
	Include specific housing and commercial characteristics of this target area.	Identified as the King Neighborhood in the 2016 Master Plan, it was noted that while among the most distressed in the City, it scored high in place-making. The King Neighborhood links the downtown to its southern borders and is accessible by transit. This area is home to 126 public housing units and 200 HUD-subsidized units. Few major commercial businesses are located in the neighborhood.
	How did your consultation & citizen participation process help you to identify this neighborhood as a target area?	New home construction, existing home rehabilitation, and Specific assistance for LMI families were concerns shared during the public participation process.
	Identify the needs in this target area	Housing, infrastructure, blight reduction
	What are the opportunities for improvement in this target area?	Streetlights, sidewalk repairs, infill housing on vacant lots, homeowner rehabilitation support
	Are there barriers to improvement in this target area?	Lack of private investment, persistent blight, and negative perceptions



General Allocation Priorities

The public (and private) reinvestment in the City of Jackson began in the downtown core over ten (10) years ago. The City of Jackson's long-term approach, as outlined in the 2016 Master Plan, included the revitalization of the urban center AND surrounding areas. Over the past 5 years, coordinated efforts have moved into residential neighborhoods in all areas of the City, with significant investments completed, underway, and/or planned related to housing, infrastructure, community spaces, and safety/security. An analysis of current census tract/block group data reveals continued low-moderate income concentrations in key parts of the City. Entitlement funds will be utilized, to the fullest extent possible, to continue the City's work in these target areas to eliminate blight, support safe and affordable housing, and provide upgrades to infrastructure, all aimed at building back Jackson's neighborhoods one block at a time.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

1	Priority Need Name	Homeowner Rehabilitation
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly
	Geographic Areas Affected	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other areas as needed
	Associated Goals	Homeowner Rehabilitation
	Description	Rehabilitation of privately owned, single family homes.
	Basis for Relative Priority	Over 90% of the City's housing stock was built before 1978; lower income homeowners are often unable to pay for the cost of repairs or obtain financing at affordable rates. City Rehabilitation Staff will review its policies and procedures, last updated in 2020. The Homeowner Rehabilitation Program will remain a major focus of CDBG assistance, providing major component replacement of aging systems for owner-occupied properties.
2	Priority Need Name	Rehabilitation Administration
	Priority Level	High
	Population	Other
	Description	All delivery costs (including staff, other direct costs, and service costs) directly related to carrying out housing rehabilitation activities. Examples include appraisal, architectural, engineering, and other professional services; preparation of work specifications and work write-ups; loan processing; survey, site, and utility plans; application processing; and other fees.
	Basis for Relative Priority	Costs associated with operating a successful homeowner rehabilitation program, which is listed as Priority 1 above.

3	Priority Need Name	Public Facilities/Infrastructure
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly, Persons with Physical Disabilities, Non-housing Community Development
	Geographic Areas Affected	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas
	Associated Goals	Public Facilities/Infrastructure
	Description	Improve the quality of public improvements and infrastructure in low-income neighborhoods.
	Basis for Relative Priority	Like all communities in Michigan, public infrastructure is difficult to maintain due to the high cost and lack of funding mechanisms. City leaders have responded to public outcry over local street conditions and insufficient street lighting in higher crime neighborhoods to the best of its ability with limited funding. These projects will continue and will be conducted with other utility upgrades to combine as many resources to the greatest extent feasible, limiting the potential financial impact to residents through special assessments. Streetlights, sidewalks, neighborhood parks/facilities, and other infrastructure will receive upgrades as feasible.

4	Priority Need Name	Code Enforcement (Legal)
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Non-housing Community Development
	Geographic Areas Affected	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other areas as needed
	Associated Goals	Code Enforcement (legal)
	Description	Legal support to the Department of Neighborhood & Economic Operations to improve low-income neighborhoods and properties.
	Basis for Relative Priority	Maintaining housing standards ensures tenants have decent, safe, and sanitary rental housing to choose from and improves community aesthetics. Enforcement of blight ordinances against those that fail to voluntarily comply has a direct effect on public perceptions of crime, supports property values, and enhances resident health and safety.

5	Priority Need Name	Residential Demolition
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Non-housing Community Development
	Geographic Areas Affected	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas
	Associated Goals	Residential Demolition
	Description	Demolition of foreclosed, vacant, or abandoned and dilapidated publicly or privately owned property in low-income neighborhoods.
	Basis for Relative Priority	Removal of hazardous buildings increases the quality of life and vitality of neighborhoods, supports property values, eliminates hazardous conditions, and reduces opportunities for criminal activity.
6	Priority Need Name	New Construction (CHDO)
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly
	Geographic Areas Affected	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas
	Associated Goals	New Construction - CHDO
	Description	Reservation of no less than 15% of the City's annual HOME allocation for use by a certified Community Housing Development Organization (CHDO) for construction of new homebuyer units.
	Basis for Relative Priority	Continued support to Jackson's CHDO with their efforts to build infill housing for sale to low-income households upon completion.
7	Priority Need Name	Homebuyer Activities
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly
	Geographic Areas Affected	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas
	Associated Goals	New Construction
	Description	Construction of affordable housing with homebuyer supports
	Basis for Relative Priority	Additional new home construction is needed in the City of Jackson, in particular for families earning 80% or less of the area median income (AMI). These funds will be used to offset the costs associated with new home construction, including (but not limited to) down payment assistance and hard/soft costs.

8	Priority Need Name	CHDO Operating Expenses
	Priority Level	High
	Description	Operating expenses related to CHDO activities; limited to no more than five (5%) percent of the City's annual HOME allocation.
	Basis for Relative Priority	Financial support to defray administrative costs incurred by the CHDO.
9	Priority Need Name	Administration/Planning
	Priority Level	High
	Description	Overall program administration, including, but not limited to, salaries, wages, and related costs of grantee staff or others engaged in program management, monitoring and evaluation.
10	Priority Need Name	Public Service Activity
	Priority Level	Low
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas
	Associated Goals	Public Service Activity
	Description	Although the priority level is low, the City will consider funding public service activities on a case-by-case basis. Activities must provide a new or improved service and be unduplicated from similar services in the community.

Table 48 – Priority Needs Summary

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that Will Influence the Use of Funds Available for Housing Type
Tenant Based Rental Assistance (TBRA)	The City of Jackson does not anticipate funding TBRA activities.
TBRA for Non-Homeless Special Needs	The City of Jackson does not anticipate funding TBRA activities.
New Unit Production	<p>New housing unit production is needed to increase the availability of affordable housing to the City’s low-income residents pursuing the American Dream of homeownership. During the years covered by this Consolidated Plan, the City will provide at least the minimum required amount of CHDO set-aside funds (15%) to a certified CHDO operating in the City of Jackson, to increase the number of new, affordable homebuyer options. Specific projects are unidentified at the writing of this 5-year plan.</p> <p>The City will utilize the remainder of HOME funds for homebuyer activities, including but not limited to down payment assistance for qualifying households toward the purchase of newly-constructed single-family homes.</p>
Rehabilitation	<p>Over 90% of the City’s housing stock was built before 1978; lower income homeowners are often unable to pay for the cost of repairs or obtain financing at affordable rates. Due to years of deferred maintenance, fully rehabilitating owner-occupied housing is becoming cost prohibitive, hindering the City’s ability to provide assistance.</p> <p>City staff will continue offering its homeowner rehabilitation assistance program, replacing aging major components, with a maximum investment of \$25,000 per property, to qualifying households earning less than 80% of the area median income (AMI).</p>
Acquisition, including preservation	The use of CDBG or HOME funds for acquisition and preservation will be subject to fluctuations in annual funding. Funds may or may not be allocated to acquisition and preservation accordingly.

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

During the previous five (5) years, the City’s annual formula allocation for CDBG has not fluctuated greatly; however, due to its overall lower amount, HOME funds are far less predictable. The five (5) year average CDBG allocation received by the City of Jackson is \$1,276,786 with a minimum of \$1,217,001 and maximum of \$1,311,780; the difference between minimum and maximum is \$94,779. HOME funds received average \$323,469 during the past five (5) years with a minimum of \$278,557 and maximum of \$356,430; the difference between minimum and maximum is \$77,873.

For planning purposes, the City deducts 3% from the most current formula allocation then adds in anticipated program income by grant. Estimated revenue for fiscal year 2025–2026 is as follows:

- **CDBG:** 2024-25 formula allocation: \$1,217,001; less 3% (-\$36,500); plus estimated program income (\$75,200) = \$1,255,701 (FY 25-26)
- **HOME:** 2024-25 formula allocation: \$278,557; less 3% (-\$8,400); plus estimated program income (\$5,000) = \$275,157 (FY 25-26)

As of the writing of the 5-Year Plan draft plan, HUD had not published the nation's 2025-2026 formula allocations. Any increased funding for CDBG should be allocated to the homeowner rehabilitation project, and any decreased funding for CDBG should be absorbed in the streetlight installation project. Any increased or decreased funding for HOME should be absorbed in the homebuyer assistance project. HUD published the nation's 2025-2026 formula allocations in time to accurately reflect first year project funding in the Annual Action Plan without having to rely on estimates. Final HUD allocations for CDBG and HOME programs are reflected.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan	Narrative Description	
			Annual Allocation:	Program Income:	Prior Year Resources:			
CDBG	Federal	Acquisition, Admin/ Planning, Economic Development, Housing, Public Improvements, Public Services	\$1,205,801	\$75,200	-0-	\$1,281,001	\$4,772,954	Annual block grant from HUD to address community development and housing needs.
HOME	Federal	Homebuyer Assistance, Homeowner Rehab, New Construction For Ownership	\$275,362	\$5,000	-0-	\$280,362	\$1,041,281	Annual grant from HUD to address affordable housing

Table 50 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City leverages CDBG and HOME funds to the extent possible against other federal, state, local, and private funding to maximize project impact. Leveraging varies from activity to activity, depending on the project and availability of additional resources that are eligible for that type of use. The CDBG program does not require matching funds like the HOME Investment Partnerships Program. Generally, HOME requires a participating jurisdiction contribute or match 25% of HOME funds spent on affordable housing; however, Jackson has been 100% exempted from this requirement due to fiscal distress.

The City has seen a greater amount of private investment for housing and business-related development over the past five (5) years. Developer investment in housing is of particular importance, and additional investment is anticipated over the next few years due to successful project completion utilizing CDBG, HOME, HOME-ARP, ARPA, and MSHDA funds.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Since 2012, City leaders have accumulated tax foreclosed parcels not sold at tax auction with the end goal of amassing sufficient contiguous parcels in various areas to promote for redevelopment. The City currently owns hundreds of vacant, buildable residential parcels, both for single and multi-family housing. Numerous developers are working in the City to construct housing at all price points and for a variety of income levels. The City will continue to strategically acquire parcels for future residential construction needs.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible		Geographic Area Served
	Entity Type	Role	
City of Jackson	Government	Non-homeless special needs, ownership, planning, neighborhood improvements, public facilities	Jurisdiction
Greater Jackson Habitat for Humanity	CHDO	Ownership, planning	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City maintains networks of state and local public agencies and non-profit service providers. Due to limited annual CDBG funds and the City’s commitment to address neighborhood issues under its purview, delivery of services are retained by City departments.

In 2019, City staff certified the Greater Jackson Habitat for Humanity (Habitat) to serve as the City’s Community Housing Development Organization (CHDO). Habitat was re-certified as the City’s CHDO in 2024. Required by the HOME program, no less than 15% of Jackson’s annual grant funds must be set aside for CHDO-eligible projects. Formed nationally in 1976, Habitat has been in operation in Jackson since 1989. With paid staff and loyal volunteers, Habitat has built, renovated, and repaired affordable housing in town. All requirements to serve as a CHDO were met, including capacity and board organization.

The Welcome Home Organization (WHO) is fairly new to Jackson, in existence for just over two (2) years. Current Welcome Home Organization projects include veterans’ housing, fresh food sales, childcare, and community outreach. The WHO was recently approved as a subrecipient for a portion of the City’s HOME-ARP funds, and will begin administering funds from that program for the construction of two (2) single-family houses for HOME-ARP qualifying populations. Leaders from the WHO have requested CHDO status with the City of Jackson, but at this time they lack the necessary staff capacity for HUD-required financial management and the necessary experience in the development of affordable housing. It is the hope of City leaders that their work with HOME-ARP funds will provide the necessary experience and capacity building for future consideration as a City-certified CHDO.

Kings Community Homes was recently approved as a second subrecipient for a portion of the City’s HOME-ARP funds, and will begin administering funds from that program for the construction of two (2) single-family houses for HOME-ARP qualifying populations. The Community Action Agency (CAA) is a former City-certified CHDO. While they are not currently acting as a CHDO in Jackson, their work rehabilitating homes in the Partnership Park neighborhood with a portion of the City’s HOME funds continues.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services		X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment & Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X		
Other			
Other	X		

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The homeless service delivery system attempts to meet needs by providing emergency shelter, permanent supportive housing, and rapid re-housing options to individuals or families facing homelessness. There are options for individuals, families with children, veterans and their families, and adults only. Homeless persons or those facing homelessness receive case management by housing advocates and are referred to other resources in the community which may help meet their needs.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The strengths of the CoC delivery service are subscribing to the Housing First model, which does not require people experiencing homelessness to address all of their problems, including behavioral health problems, or to graduate through a series of programs before they can access housing. Housing First does not mandate participation in services, either, in order to stay housed, although it is highly

encouraged. The CoC has also adopted a Coordinated Entry policy which ensures people with the greatest needs receive priority for any type of housing and homeless assistance. Coordinated Entry does not screen people out for assistance because of perceived barriers to housing or services including, but not limited to, lack of employment or income, drug or alcohol use, or having a criminal record.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Active members of the CoC represent various public and non-profit agencies in Jackson that provide mainstream and specialized services to homeless, non-homeless special needs, and general populations and subpopulations. Discussion at monthly CoC meetings always includes identification of emerging needs or gaps in service that need attention.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeowner Rehabilitation	2025	2029	Affordable Housing	3 Target areas; all other areas as needed	Homeowner Rehabilitation	CDBG HOME	Homeowner Rehabilitation: 50 homeowner units rehabilitated
2	Public Facilities/Infrastructure	2025	2029	Non-Housing Community Development	3 target areas; all other eligible areas	Public Facilities/ Infrastructure	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2,000 Persons Assisted
3	Code Enforcement (legal)	2025	2029	Non-Housing Community Development	3 Target areas; all other areas as needed	Code Enforcement (Legal)	CDBG	Housing Code Enforcement: 300 Household Housing Unit
4	Residential Demolition	2025	2029	Clearance and Demolition	3 target areas; all other eligible areas	Residential Demolition	CDBG	Buildings Demolished: 30 Buildings
5	New Construction - CHDO	2025	2029	Affordable Housing	3 target areas; all other eligible areas	New Construction (CHDO)	HOME	Homeowner Housing Added: 3 Household Housing Units
6	Homebuyer Activities	2025	2029	Affordable Housing	3 target areas; all other eligible areas	New Construction	HOME	Homeowner Housing Added: 16 Household Housing Unite
7	Public Service Activity	2025	2029	Non-Housing Community Development	3 target areas; all other eligible areas	Public Service Activity	CDBG	Number of low-income persons served: unknown

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Homeowner Rehabilitation
	Goal Description	Over 90% of the City’s housing stock was built before 1978; lower income homeowners are often unable to pay for the cost of repairs or obtain financing at affordable rates. City Rehabilitation Staff will review its policies and procedures, last updated in 2020. The Homeowner Rehabilitation Program will remain a major focus of CDBG assistance, providing major component replacement of aging systems for owner-occupied properties.
2	Goal Name	Public Facilities/Infrastructure
	Goal Description	Like all communities in Michigan, public infrastructure is difficult to maintain due to the high cost and lack of funding mechanisms. City leaders have responded to public outcry over local street conditions and insufficient street lighting in higher crime neighborhoods to the best of its ability with limited funding. These projects will continue and will be conducted with other utility upgrades to combine as many resources to the greatest extent feasible, limiting the potential financial impact to residents through special assessments. Streetlights, sidewalks, neighborhood parks/facilities, and other infrastructure will receive upgrades as feasible.
3	Goal Name	Code Enforcement (legal)
	Goal Description	Legal support to the Community Development Department to improve low-income neighborhoods and properties.
4	Goal Name	Residential Demolition
	Goal Description	Demolition of foreclosed, vacant, or abandoned and dilapidated publicly or privately owned property in low-income neighborhoods. Removal of hazardous buildings increases the quality of life and vitality of neighborhoods, supports property values, eliminates hazardous conditions, and reduces opportunities for criminal activities.
5	Goal Name	New Construction - CHDO
	Goal Description	Continued support to Jackson’s CHDO(s) with their efforts to build infill housing for sale to low-income households upon completion.
6	Goal Name	Homebuyer Activities
	Goal Description	Additional new home construction is needed in the City of Jackson, in particular for families earning 80% or less of the area median income (AMI). These funds will be used to offset the costs associated with new home construction, including (but not limited to) down payment assistance and hard/soft costs.
7	Goal Name	Public Service Activity
	Goal Description	Although the priority of funding public service activities is low, the City will consider requests on a case-by-case basis. Activities must be a new or improved service and unduplicated by other agencies.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

During the five-year period covered by this Consolidated Plan, it is anticipated that the City will add nineteen (19) new homebuyer units for qualified low-income families through CHDO and homebuyer activities. Through 5-year no interest, low repayment and partially-deferred loans, approximately 75 households will benefit from rehabilitation of the major home components and improved energy efficiencies, allowing low-income households to spend less on utilities and major maintenance expenses. Approximately 2,580 low-income residents will benefit from undertakings in the three local target areas identified in the Consolidated Plan.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The JHC is not subject to a Section 504 Voluntary Compliance Agreement; however, future modernization plans intend to create fully accessible units in no less than 10% of units with hopes to increase the percentage up to 20%. Disabled applicants are given preference at Reed Manor and Shahan-Blackstone. All locations make reasonable accommodations to any tenant presenting a disability in an effort to improve accessibility.

Activities to Increase Resident Involvements

Active Resident Advisory Boards are in place at Reed Manor. Several attempts have been made to initiate a Resident Advisory Board at Shahan-Blackstone North and Chalet Terrace, but efforts have thus far fallen short. New efforts will be made this Spring and Summer '25. Residents are encouraged to attend Board meetings, talk with their housing managers, and even the Executive Director if warranted. This year, JHC Housing Managers will be conducting regular one-on-one meetings with residents to address their concerns and gather feedback on specific issues or interests, such as tenant handbook guidelines, recreation, safety, or community gardens, and explore training opportunities for residents to develop skills and become leaders within their communities. JHC also rotates Board Meetings at each different asset management project (AMP).

Annual surveys are distributed to tenants to get their opinions on real or perceived conditions at their complex and what improvements they would like to be considered. Approximately 30 years ago, the JHC participated in a homeownership program through HUD and created fifty (50) scattered site, single family homes with the intent to provide homeownership opportunities to its residents. When the program ended, only ten (10) homes had been sold and the other 40 incorporated as scattered-site units through either Chalet Terrace or Shahan.

Is the public housing agency designated as troubled under 24 CFR part 902?

Yes

Plan to remove the ‘troubled’ designation

The JHC hired a new Executive Director just over 12 months ago. Since that time, the organization has operated on a balanced budget (FY 2024), completed a HUD-approved annual plan, completed a multi-year audit, established a leasing plan, and created a capital improvements plan. Staff are working closely with HUD to remediate all remaining reporting and financial requirements, with a goal of removal from the HUD “troubled” list by the end of 2025.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City of Jackson does not intentionally create policies, codes, or rules that create barriers to affordable housing, but rather faces the same realities experienced by most municipalities – increasing construction costs, complexity of financing for larger projects, and an affordability gap between incomes and housing costs. Likewise, most policies, ordinances, and/or codes are established to maintain compliance with local, state, and federal guidelines or for health and safety reasons.

Conversations with local housing providers and social service agencies reveals affordable housing in Jackson may not necessarily be limited to a specific type of housing but rather addressing the issues that interfere with obtaining housing. Examples of barriers include, but are not limited to, the following:

- Landlords unaware of the laws governing rental housing, including Fair Housing laws and prohibited discriminatory practices.
- Tenants who do not realize their rights as it pertains to rental housing, including Fair Housing laws and awareness of discriminatory practices.
- Exorbitant security deposits, non-refundable application fees, and unaffordable utility deposits
- Inability to obtain utilities in tenant’s name.
- Limited public transportation options.
- Poor credit history, especially for youth just out of college, persons facing unexpected life issues, or ruined as part of a domestic violence situation.
- Rejection of service animals in the unit.
- Refusal to accept Housing Choice Vouchers or charging rents not at fair market value
- People who are routinely discriminated against often don’t notice or identify discrimination. If discrimination is suspected, the tenants are often more interested in finding housing to meet their immediate need rather than going through a lengthy appeal process.
- Inability to save sufficient funds for a required down-payment for the purchase of a home
- Limited housing stocks at all income levels and price points, but most notably for low-moderate income earners.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

City staff will continue to collaborate with the CoC to develop strategies to remove or ameliorate barriers to affordable housing. The CoC has identified several strategies to implement, including, but not limited to, the following:

- Further the Landlord Advocacy and Education position currently funded for the short term.
- Work with landlords to determine what they would require to expand the number of units available to subsidy.
- Increase the number of landlords willing to rent to Housing Choice Voucher holders.
- Develop a multi-sector strategy to reduce issues involving utilities as a barrier to housing.
- Another concept to increase acceptance of tenants with Housing Choice Vouchers is to establish a fund to assist the private-market landlord with repairing potential damages incurred when accepting an irresponsible Section 8 tenant.

The City's Affordable Housing Development Board regularly provides experience-based advice to staff regarding possible solutions regarding the availability of affordable housing. In conjunction with the 2023 Housing Strategy and Policy Framework, numerous strategies are in place to attack this issue, including the 100 Homes Program and the Expanded Rehabilitation Program (both supported with ARPA funds). Additional new construction projects throughout the City will also offer greater affordable housing options, including single-family and multi-family units in all parts of the City. Local, state, and federal subsidies are being levied to assist with many of these projects, and the City of Jackson is focused on developing multiple housing options that are affordable at various income levels.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The CoC is the local homeless assistance planning group which encourages community collaboration to address housing and homeless needs. Outreach is conducted at emergency shelters, domestic violence shelters, with youth providers, and through street outreach to locate potential participants. Case managers complete an initial assessment to prioritize need and set housing stability goals.

Addressing the emergency and transitional housing needs of homeless persons

Homeless facilities and services are managed and provided through agencies that participate with the CoC, including special needs service agencies. The CoC adopted a Coordinated Entry policy which ensures people with the greatest needs receive priority for any type of housing and homeless assistance. Coordinated Entry does not screen people out for assistance because of perceived barriers to housing or services including, but not limited to, lack of employment or income, drug or alcohol use, or having a criminal record. Clients are linked to community resources which best meet their immediate and future needs.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Homeless households are encouraged to obtain an assessment and linkage to available services to help resolve their housing crisis through CAA. Outreach staff is strategically placed in the community to ensure homeless or at-risk households are aware of community resources to prevent or end homelessness. The housing assessment program will continue to assess at-risk households to prevent homelessness by using available prevention resources, shelter diversion tactics, and linkage to mainstream resources to avoid loss of housing.

On September 21, 2021, the City of Jackson was notified that it was eligible to receive \$1,137,398 in HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing and Urban Development upon approval of this Allocation Plan. The purpose of this supplemental funding is to provide homelessness assistance and supportive services through several eligible activities, which include: the production or preservation of affordable housing; tenant based rental assistance (TBRA); supportive services (including homeless prevention services and housing counseling); the purchase or development of non-congregate shelters; administration and planning; and Non-profit operating and capacity building assistance. The City's Allocation Plan was approved by HUD in the Spring of 2023, describing the distribution of HOME-ARP funds and identifying any preferences for eligible activities which primarily assist the HOME-ARP qualifying populations, including: homeless persons; persons at risk of becoming homeless; those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; other populations where assistance would prevent the family's homelessness or serve those with the greatest risk of housing instability; and, veterans and families that include a veteran family member that meet one of the preceding criteria. The City of Jackson has identified three target areas for funding: rental housing construction, rental housing rehabilitation, and supportive services. The City reviewed proposals from local housing nonprofits for

the creation of affordable rental housing with HOME-ARP funds, and two organizations have been selected to create a total of four (2 each) single-family homes: Kings Community Homes and the Welcome Home Organization. Construction is anticipated to begin in summer 2025. These funds must be spent by September 30, 2030.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Preventing homelessness from occurring at all is the most effective means to avoid trauma to families and the creation of larger crises which might prevent a household from moving forward successfully. CAA receives funding from HUD to operate a rapid re-housing program, providing short-term assistance to persons at risk of becoming homeless. Coordinating with mainstream providers continues to support effective and efficient access to mainstream benefits by eligible participants.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

With 90% of the City's housing stock built before 1978, the year lead was banned from residential paint, the likelihood some level of lead-based paint exists in a house is great. More than one-half of the City's homes were built before 1950 when paint manufacturers voluntarily began reducing the level of lead in paint. Being a prosperous, growing City when lead was most prevalent in paint increases the risk of high lead levels in existence in deteriorated paint and dust. In 2013, City administration proposed an ordinance requiring owners of property which was not their primary residence to obtain and submit a lead paint inspection was not enacted by the Jackson City Council as they felt it interfered with the business of real estate investment.

In 2017, Jackson was awarded \$2.9 million from the Office of Lead Hazard Control and Healthy Homes (OLHCHH) to remediate lead hazards in residential properties occupied by low-income families with children under 6 years of age. Although efforts to implement a strong program were made by City staff, the program was not successful and was terminated early for reasons that include, but are not limited to, the following:

- The lack of community interest, especially from homeowners and parent/tenants whose children had elevated blood lead levels (EBL).
- The lead grant generally capped remediation costs at \$20,000 per unit, with the national average alleged to be between \$8,000 and \$10,000 per unit. Jackson was once a very prosperous community in the late 1800s/early 1900s; housing reflected that prosperity through large sizes, many windows, and lots of lead paint. The average cost to remediate lead-based paint in Jackson averaged over \$50,500.
- Nationwide, a lack of properly trained and certified lead abatement contractors, supervisors, and workers is a major barrier to completing units. Jackson was no exception – over 90 letters were sent to state certified lead abatement contractors in Jackson and surrounding counties notifying them of the City's LBPHC award. The City received three (3) responses from its mass mailing to contractors; only one (1) contractor consistently submitted bids.

The City routinely inspects all housing that is not the primary residence of the property owner. Evidence of deteriorated paint is cited as a violation and must be properly treated for the property owner to receive a certificate of compliance.

How are the actions listed above related to the extent of lead poisoning and hazards?

With nearly every residential structure located in the City of Jackson likely containing some level of lead-based paint, the City's rehabilitation programs require a combination lead paint inspection/lead risk assessment if a planned action disturbed a painted surface. Incorporating HUD's Lead Safe Housing Rule into the City's rehabilitation standards, requirements vary dependent upon the type and level of financial assistance. The project must pass a lead clearance examination following abatement, interim controls, paint stabilization, or standard treatments. Inspections of non-owner occupied housing units will continue on a biennial basis. The condition of interior and exterior paint will be noted and, if appropriate, cited as a violation and ordered to be repaired.

How are the actions listed above integrated into housing policies and procedures?

The City of Jackson has incorporated the Lead Safe Housing Rule into its federally-funded housing and community development programs. Further, Chapter 14, Article II – Minimum Housing Standards, City of Jackson Code of Ordinances governs the level and extent of residential housing inspections conducted.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City of Jackson has neither the facilities nor resources to carry out programs directly targeted at reducing the number of households at or below the poverty level. However, through the use of CDBG and HOME funds, the City offers services and programs to make housing affordable to its low- to moderate-income homeowners:

- *Rehabilitation* – up to \$25,000 is available through a 5-year, zero-interest, deferred loan with a partial low repayment component to correct emergency hazards from major system failures.
- *Homebuyer New Construction* – currently under development through the City’s CHDO, the Greater Jackson Habitat for Humanity. The 2025-2029 5-Year Consolidated Plan further outlines planned down-payment assistance for those earning less than 80% of the area median income.

In addition, the City ensures tenants have decent, safe, and sanitary living conditions through its Housing Code Enforcement (HCE) program (not federally funded). The HCE program also improves neighborhood living conditions through enforcement of various blight ordinances, such as garbage, inoperable vehicles, noxious weeds and trees, and zoning violations.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

City leaders will collaborate with the United Way of Jackson County, the Continuum of Care, and other community service providers in their efforts to reduce the number of impoverished residents.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Due to the low number of projects and no outside sub-recipients of CDBG funds, the Grant Coordinator and Financial Analyst generally ensure compliance with federal rules and regulations, procurement requirements, timely expenditure of funds, and project status through desk reviews. Interdepartmental meetings and technical assistance are quickly organized if necessary to safeguard against miscommunication. The Grant Coordinator conducts site visits before, during, and after planned projects to confirm compliance measures are in place, working closely with responsible staff in other departments such as Engineering for street reconstruction projects and the Chief Building Official for residential demolition.

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

During the previous five (5) years, the City’s annual formula allocation for CDBG has not fluctuated greatly; however, due to its overall lower amount, HOME funds are far less predictable. The five (5) year average CDBG allocation received by the City of Jackson is \$1,276,786 with a minimum of \$1,217,001 and maximum of \$1,311,780; the difference between minimum and maximum is \$94,779. HOME funds received average \$323,469 during the past five (5) years with a minimum of \$278,557 and maximum of \$356,430; the difference between minimum and maximum is \$77,873. For planning purposes, the City deducts 3% from the most current formula allocation then adds in anticipated program income by grant. Estimated revenue for fiscal year 2025–2026 is as follows:

- **CDBG:** 2024-25 formula allocation: \$1,217,001; less 3% (-\$36,500); plus estimated program income (\$75,200) = \$1,255,701 (FY 25-26)
- **HOME:** 2024-25 formula allocation: \$278,557; less 3% (-\$8,400); plus estimated program income (\$5,000) = \$275,157 (FY 25-26)

As of the writing of the 5-Year Plan draft plan, HUD had not published the nation's 2025-2026 formula allocations. Any increased funding for CDBG should be allocated to the homeowner rehabilitation project, and any decreased funding for CDBG should be absorbed in the streetlight installation project. Any increased or decreased funding for HOME should be absorbed in the homebuyer assistance project. HUD published the nation's 2025-2026 formula allocations in time to accurately reflect first year project funding in the Annual Action Plan without having to rely on estimates. Final HUD allocations for CDBG and HOME programs are reflected.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan	Narrative Description	
			Annual Allocation:	Program Income:	Prior Year Resources:			
CDBG	Federal	Acquisition, Admin/ Planning, Economic Development, Housing, Public Improvements, Public Services	\$1,205,801	\$75,200	-0-	\$1,281,001	\$4,772,954	Annual block grant from HUD to address community development and housing needs.
HOME	Federal	Homebuyer Assistance, Homeowner Rehab, New Construction For Ownership	\$275,362	\$5,000	-0-	\$280,362	\$1,041,281	Annual grant from HUD to address affordable housing

Table 54 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City leverages CDBG and HOME funds to the extent possible against other federal, state, local, and private funding to maximize project impact. Leveraging varies from activity to activity, depending on the project and availability of additional resources that are eligible for that type of use. The City recently received a grant award of \$880,000 from the Michigan State Housing Development Authority (MSHDA), for the creation of affordable homes that are visitable. Construction of these homes will begin in FY 2024-2025, continuing through the first half of fiscal year 2025-2026. The City is also utilizing funds from the American Rescue Plan Act (ARPA) for an Expanded Rehabilitation Program. This \$500,000 investment will provide rehabilitation services for owner and non owner-occupied properties. Both the MSHDA and ARPA-funded rehabilitation programs feature a \$25,000 per property project maximum, and both will allow the City to target its aging housing stock and support lower-income families.

The CDBG program does not require matching funds like the HOME Investment Partnerships Program. Generally, HOME requires a participating jurisdiction contribute or match 25% of HOME funds spent on affordable housing; however, Jackson has been 100% exempted from this requirement due to fiscal distress.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Since 2012, City leaders accumulated tax foreclosed parcels not sold at public tax auctions with the end goal of amassing sufficient contiguous parcels in various areas to promote for redevelopment. One such area is at the corner of Franklin and Mechanic Streets where vacant parcels owned by the City of Jackson and CAA provided the impetus for an affordable housing collaboration. The Greater Jackson Habitat for Humanity used these parcels to construct four (4) new single-family homes as the City’s Community Housing Development Organization (CHDO) for sale to income qualified homeowners upon completion, completed in 2024. Habitat for Humanity is currently building 2 single-family homes on land provided by the City of Jackson, with a third home planned for summer 2025. The City will also provide land to two (2) local nonprofit agencies for the construction of four (4) homes as part of the City’s HOME-ARP allocation. Finally, City land will be used for the construction of four (4) visitable homes, with funding from the MSHDA MICH grant program.

The City also owns approximately 500+ buildable residential lots, products of a multi-year demolition program aimed at reducing neighborhood blight. Utilizing ARPA funds, the City is offering down payment assistance to income-qualified buyers for the purchase of newly constructed homes on these vacant lots, as part of the “100 Homes Program.” Builder/developer incentives are layered into this innovative program, and new homes are under construction. Similar builder/developer incentives are being offered outside of the 100 Homes Program, and as a result new homes are being built throughout the City, marking the beginning of an anticipated larger-scale neighborhood rebuilding process.

Discussion

Developers are building new residential units in the City of Jackson. While the City currently owns a plethora of buildable parcels, demand is high and the strategic acquisition of additional buildable vacant parcels is vital to plan for future housing needs. City staff will continue working to acquire strategically placed parcels through the tax foreclosure process (exercising the right of first refusal), donation and, when needed, purchase.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeowner Rehabilitation	2025	2026	Affordable Housing	3 Target areas; all other areas as needed	Homeowner Rehabilitation	\$275,300 CDBG	Homeowner Rehabilitation: 10 homeowner units rehabilitated
2	Public Facilities/Infrastructure	2025	2026	Non-Housing Community Development	3 target areas; all other eligible areas	Public Facilities/ Infrastructure	\$480,701 CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2,000 Persons Assisted
3	Code Enforcement (legal)	2025	2026	Non-Housing Community Development	3 Target areas; all other areas as needed	Code Enforcement (Legal)	\$25,000 CDBG	Housing Code Enforcement: 300 Household Housing Unit
4	Residential Demolition	2025	2026	Clearance and Demolition	3 target areas; all other eligible areas	Residential Demolition	\$200,000 CDBG	Buildings Demolished: 6 Buildings
5	New Construction - CHDO	2025	2026	Affordable Housing	3 target areas; all other eligible areas	New Construction (CHDO)	\$44,000 HOME	Homeowner Housing Added: 1 Household Housing Unit
6	Homebuyer Activities	2025	2026	Affordable Housing	3 target areas; all other eligible areas	New Construction	\$207,362 HOME	Homeowner Housing Added: 3 Household Housing Unite

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Homeowner Rehabilitation
	Goal Description	The Homeowner Rehabilitation Program will continue providing major component replacement of aging systems for owner-occupied properties.
2	Goal Name	Public Facilities/Infrastructure
	Goal Description	Streetscape improvements (including tree planting, sidewalk and curb/gutter repairs), for the improvement of various neighborhoods; and streetlight installation
3	Goal Name	Code Enforcement (legal)
	Goal Description	Legal support to the Community Development Department to improve low-income neighborhoods and properties.
4	Goal Name	Residential Demolition
	Goal Description	Demolition of foreclosed, vacant, or abandoned and dilapidated publicly or privately owned property in low-income neighborhoods. Removal of hazardous buildings increases the quality of life and vitality of neighborhoods, supports property values, eliminates hazardous conditions, and reduces opportunities for criminal activities.
5	Goal Name	New Construction - CHDO
	Goal Description	HOME funds set aside for future CDHO-eligible projects yet to be identified
6	Goal Name	Homebuyer Activities
	Goal Description	New construction for income-eligible households with homebuyer supports, including (but not limited to) down payment assistance and hard/soft costs

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Jackson is funding projects to achieve the goals and objectives defined in the 2025-2029 Five-Year Consolidated Plan to generally improve the livability and accessibility of low-income neighborhoods. After several years of focusing CDBG funds towards the revitalization of the downtown, City leaders have expanded assistance into the adjoining neighborhoods. Housing, parks, and infrastructure projects have been the focus of these efforts. As the City moves into the next phase of work under this 5-year plan, neighborhood reinvestment will be the focus. The initial phase will focus on streetscape improvements, streetlight installation, clearance of severely dilapidated residential structures, and rehabilitation. The fundamental goal is to improve the living conditions for the low- to moderate-income households residing in the three target areas specified in the Consolidated Plan.

Projects

#	Project Name
1	Residential Rehabilitation
2	Streetscape Improvements
3	Streetlight Installation
4	Code Enforcement—Legal Services
5	Residential Demolition
6	Rehabilitation Administration
7	General Administration/Planning
8	Community Housing Development Organization (CHDO) Reserve
9	Homebuyer Activities

Table 56 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The level of CDBG funds Jackson receives annually is relatively low considering increasing costs to implement improvements and is insufficient to meet all the demands for assistance. Historically, attempting to fund as many projects as possible did little to impact the residents as a whole; therefore, the number of projects has decreased to ensure sufficient funding to complete activities which boost the community overall. City leaders recognize needs exist in the community but are also cognizant of many other non-housing needs it is solely responsible for, such as infrastructure improvements, park improvements, street lighting, etc. Reliance on non-profit and faith-based organizations to meet the low-income population's direct service needs through other available funding sources allows the City to focus on improving low-income neighborhoods which subsequently impacts the entire City.

AP-38 Project Summary

Project Summary Information

1	Project Name	Residential Rehabilitation
	Target Area	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other areas as needed
	Goals Supported	Homeowner Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$275,300
	Description	Provision of zero-interest, low repayment rehabilitation loans to low-income households to replace aged major components in the primary residence before they become an emergency.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Specific sites will be determined in the future.
	Location Description	Specific sites will be determined in the future.
	Planned Activities	Ten (10) or more low-income homeowners will receive rehabilitation assistance.
2	Project Name	Streetscape Improvements
	Target Area	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas as needed
	Goals Supported	Public Facilities/Infrastructure
	Needs Addressed	Neighborhood Improvements
	Funding	CDBG: \$150,000
	Description	Streetscape improvements to various City blocks, including sidewalk repairs, curb cuts, and the planting of street trees to encourage in-fill housing by developers

	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Specific neighborhood blocks will be determined in the future.
	Location Description	Specific blocks will be determined in the future.
	Planned Activities	To be determined
3	Project Name	Streetlight Installation
	Target Area	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr.
	Goals Supported	Public Facilities/Infrastructure
	Needs Addressed	Neighborhood Improvements
	Funding	CDBG: \$330,701
	Description	Streetlight installation in CDBG-eligible areas to create safe and walkable neighborhoods and to encourage in-fill housing by developers
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Specific area(s) will be determined in the future
	Location Description	Specific area(s) will be determined in the future
	Planned Activities	Streetlight installation in CDBG-eligible areas to create safe and walkable neighborhoods and to encourage in-fill housing by developers
4	Project Name	Code Enforcement - City Attorney's Office
	Target Area	Not applicable
	Goals Supported	Code Enforcement (legal)
	Needs Addressed	Code Enforcement (Legal)
	Funding	CDBG: \$25,000
	Description	The City Attorney's Office provides legal services for various code enforcement activities including housing code enforcement and blight elimination, contract review, and approval.

	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 300 cases will be filed for prosecution in the City's Administrative Hearings Bureau to help eliminate blight and improve neighborhood quality in the low-income residential areas of the City.
	Location Description	Various CDBG-eligible neighborhoods within the City of Jackson which are comprised of 51% or more low- to moderate-income residents.
	Planned Activities	Enforcement of various housing and blight ordinances to improve neighborhood conditions.
5	Project Name	Residential Demolition
	Target Area	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas as needed
	Goals Supported	Residential Demolition
	Needs Addressed	Residential Demolition
	Funding	CDBG: \$200,000
	Description	Demolition of foreclosed, vacant, or abandoned residential properties within CDBG-eligible areas across the City.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Limited to no more than 30% of the City's annual CDBG expenditures, approximately six (6) residential structures will be demolished.
	Location Description	Eligible sites will be determined based upon Section 106 review and located in CDBG-eligible areas within the City.
	Planned Activities	Demolish foreclosed, vacant, or abandoned residential structures within CDBG-eligible neighborhoods.
6	Project Name	Rehabilitation Administration
	Target Area	Not applicable
	Goals Supported	Homeowner Rehabilitation

	Needs Addressed	Rehabilitation Administration
	Funding	CDBG: \$150,000
	Description	All delivery costs directly related to carrying out housing rehabilitation activities, including staff, other direct costs, and service costs.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Specific sites will be determined in the future.
	Location Description	Specific sites will be determined in the future.
	Planned Activities	Ten (10) or more low-income homeowners will receive rehabilitation assistance.
7	Project Name	Administration/Planning
	Target Area	Not applicable
	Goals Supported	Not applicable
	Needs Addressed	Administration/Planning
	Funding	CDBG: \$150,000 HOME: \$ 29,000
	Description	Overall program administration, including, but not limited to, salaries, wages, and related costs of grantee staff or others engaged in program management, monitoring and evaluation.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	Not applicable
	Planned Activities	Not applicable
	Project Name	CHDO Reserve Activity

8	Target Area	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas as needed
	Goals Supported	CHDO Reserve
	Needs Addressed	Affordable Housing
	Funding	HOME: \$44,000
	Description	Funds held in reserve for use by a certified CHDO on future eligible activities
	Target Date	6/30/2029
	Estimate the number and type of families that will benefit from the proposed activities	Specific activities will be determined in the future.
	Location Description	Specific activities will be determined in the future.
	Planned Activities	To be determined
9	Project Name	New Construction
	Target Area	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr., all other eligible areas as needed
	Goals Supported	Homebuyer Activities
	Needs Addressed	Affordable Housing
	Funding	HOME: \$207,362
	Description	New construction for income-eligible households with homebuyer supports, including (but not limited to) down payment assistance and hard/soft costs
	Target Date	6/30/2029
	Estimate the number and type of families that will benefit from the proposed activities	Specific activities(s) will be determined in the future
	Location Description	Specific area(s) will be determined in the future
Planned Activities	To be determined	

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The 2025-2029 Five-Year Consolidated Plan identified three (3) local target areas for funding allocation priorities:

West of Henry Ford Allegiance Health - Identified in the 2016 Master Plan as part of the Health and Downtown Neighborhoods, both of which were deemed transitional. This area was also labeled as place-making, forming part of the community's core and in the top tier for transit and non-motorized connectivity. While significant housing development is occurring in the neighborhood, additional work must continue related to infrastructure improvements.

East of S Martin Luther King Jr Dr - Identified as the King Neighborhood in the 2016 Master Plan, it was noted that while among the most distressed in the City, it scored high in place-making. The King Neighborhood links the downtown to its southern borders and is accessible by transit. This area is home to 126 public housing units and 200 HUD-subsidized units. Few major commercial businesses is located in the neighborhood. The MLK-CIA is working hard to transform this area, through community-centered leadership and the effective distribution of American Rescue Plan Act (ARPA) funds. CDBG and HOME-funded programs related to housing and infrastructure development/stabilization will provide an excellent compliment to this work.

West of S Martin Luther King Jr Dr - This area is partially in the Downtown and Partnership Park neighborhoods as identified in the 2016 Master Plan. While the Downtown neighborhood is labeled transitional, Partnership Park is deemed distressed.

The local target area "West of Henry Ford Allegiance Health" is located between Ganson Street and the railroad tracks running parallel with Louis Glick Highway from Mechanic Street on the west and Waterloo Avenue on the east. South Martin Luther King Jr. Drive (formerly Francis Street) is the dividing line between two other target areas, both of which run between Franklin Street and High Street. The east half will cover the area between South Martin Luther King Jr. Drive and Cooper Street; the west half will cover the area between South Martin Luther King Jr. Drive and Greenwood Avenue.

Geographic Distribution

Target Area	Percentage of Funds
West of Henry Ford Allegiance Health	15
East of S Martin Luther King Jr Dr	15
West of S Martin Luther King Jr Dr	15

Table 57 - Geographic Distribution

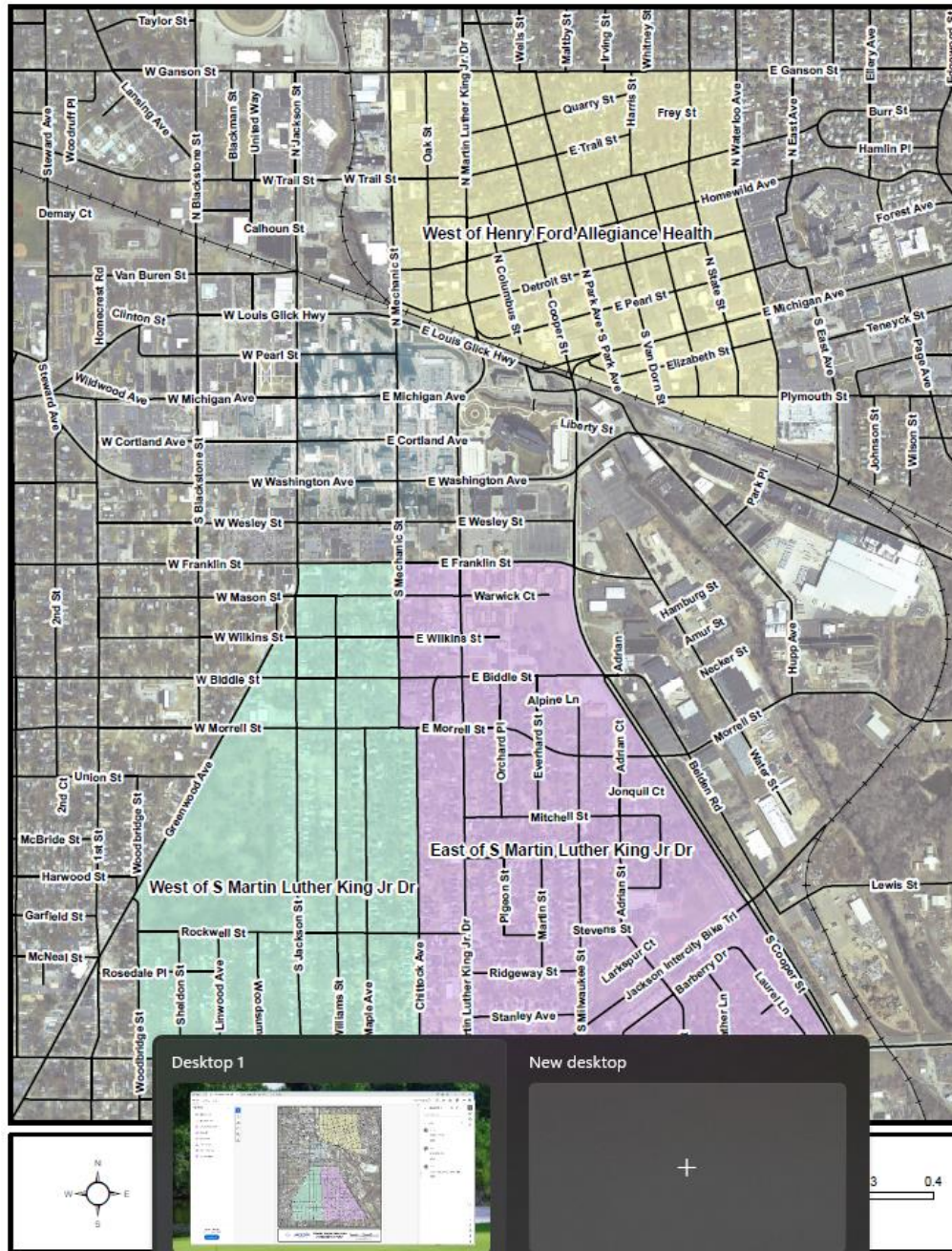
Rationale for the priorities for allocating investments geographically

The public reinvestment in the City of Jackson began in the downtown core over ten (10) years ago. The City of Jackson's long-term approach, as outlined in the 2016 Master Plan, included the revitalization of the urban center AND surrounding areas. Over the past 5 years, coordinated efforts have moved into residential neighborhoods in all areas of the City, with significant investments completed, underway, and/or planned related to housing, infrastructure, community spaces, and safety/security. An analysis of current census tract/block group data reveals continued low-moderate income concentrations in key parts of the City. Entitlement funds will be utilized, to the fullest extent possible, to continue the City's

work in these target areas to eliminate blight, support safe and affordable housing, and provide upgrades to infrastructure, all aimed at building back Jackson’s neighborhoods one block at a time. The percentage of low- to moderate-income residents in these three target areas ranges from 70.64% to 92.70%. Census Tracts 11 is also one (1) of only two (2) Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) areas within the City limits.

Discussion

Efforts to expend grant funds in or near these target areas will be made to the greatest extent feasible. The City will provide year-end results in its Consolidated Annual Performance and Evaluation Report.



Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Over 90% of the City’s housing stock was built before 1978; lower income homeowners are often unable to pay for the cost of repairs or obtain financing at affordable rates. Due to years of deferred maintenance and the likely presence of lead-based paint, fully rehabilitating owner-occupied housing has become cost prohibitive, hindering the City’s ability to provide assistance. Available zero-interest, low repayment rehabilitation loans are now limited to replacing a home’s major components that are nearing the end of their useful lifespan before they become an emergency. New housing unit production is needed to increase the availability of affordable housing to the City’s low-income residents pursuing the American Dream of homeownership. The City will utilize HOME funds for this purpose through described homebuyer activities, including a planned down payment assistance program for new construction homes maintaining an appropriate affordability period for households earning at or below 80% of the area median income.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	13
Special-Needs	0
Total	13

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	13
Acquisition of Existing Units	0
Total	13

Table 59 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The Jackson Housing Commission (JHC) has served as the City's Public Housing Authority (PHA) for nearly 60 years and also services all of Jackson County. JHC is considered a medium-sized agency providing 500 public housing units, 40 scattered-site single family homes, and up to 475 Housing Choice Vouchers (HCV).

Actions planned during the next year to address the needs to public housing

The City of Jackson has a strong working relationship with the Jackson Housing Commission (JHC). The JHC Executive Director currently serves on the City's Affordable Housing Development Board (AHDB), meeting regularly with City staff to discuss JHC needs and current initiatives. The JHC is a sub-recipient of funds from a State Allocation Grant, administered by City staff and aimed at improving conditions and tackling capital improvements at all JHC facilities. JHC leadership is actively working to improve conditions at all facilities, in particular Reed Manor. On-time reporting to HUD, transparency, and attention to resident needs are major focus areas.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Active Resident Advisory Boards are in place at Reed Manor. Several attempts have been made to initiate a Resident Advisory Board at Shahan-Blackstone North and Chalet Terrace, but efforts have thus far fallen short. New efforts will be made this Spring and Summer '25. Residents are encouraged to attend Board meetings, talk with their housing managers, and even the Executive Director if warranted. This year, JHC Housing Managers will be conducting regular one-on-one meetings with residents to address their concerns and gather feedback on specific issues or interests, such as tenant handbook guidelines, recreation, safety, or community gardens, and explore training opportunities for residents to develop skills and become leaders within their communities. JHC also rotates Board Meetings at each different asset management project (AMP).

Annual surveys are distributed to tenants to get their opinions on real or perceived conditions at their complex and what improvements they would like to be considered. Approximately 30 years ago, the JHC participated in a homeownership program through HUD and created fifty (50) scattered site, single family homes with the intent to provide homeownership opportunities to its residents. When the program ended, only ten (10) homes had been sold and the other 40 incorporated as scattered-site units through either Chalet Terrace or Shahan.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The JHC is currently listed as a HUD troubled agency. The JHC hired a new Executive Director just over 12 months ago. Since that time, the organization has operated on a balanced budget (FY 2024), completed a HUD-approved annual plan, completed a multi-year audit, established a leasing plan, and created a capital improvements plan. Staff are working closely with HUD to remediate all remaining reporting and financial requirements, with a goal of removal from the HUD "troubled" list by the end of 2025.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Jackson County Continuum of Care (CoC) is the local homeless assistance planning group, which encourages community collaboration to address housing and homeless needs. The CoC is comprised of representatives from a variety of non-profit entities, faith-based organizations, community stakeholders, and state and local government serving households and individuals experiencing housing crises. The group's focused, structured approach identifies existing needs and resources, detects gaps in service, and monitors emerging conditions. Funding received by the CoC is used to prevent homelessness, rapidly re-house people in a housing crisis, and transform the system so more people can obtain and maintain housing.

Homeless providers in Jackson County use a Homeless Management Information System (HMIS) to collect client-level data and data on the provision of housing to homeless individuals and families, and persons at risk of homelessness. The CoC also participates in an annual Point-in-Time (PIT) Count where volunteers count both sheltered and unsheltered persons experiencing homelessness on a single night in January. Data in this Homeless Needs Assessment was gleaned from both the current HMIS data to capture a full year of information, and the 2024 PIT Count conducted on January 31, 2024.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness, including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

City staff will continue to participate with the CoC, including subcommittees, to the extent feasible. It is important not only to keep City leaders aware of the community's health and emerging needs, but also to impart knowledge and understanding of government capabilities and limitations. Exchange of information is essential along with actionable participation by City staff.

Homeless facilities and services are managed and provided through agencies that participate with the CoC. Outreach is conducted at emergency shelters, domestic violence shelters, with youth providers, and through street outreach to locate potential participants. Case managers complete an initial assessment to prioritize need and set housing stability goals. The City provided homeless hotel housing assistance from December 2023-April 2024, beginning with on-the-ground assistance and transitioning to administering grant funding to a local agency. While there are no immediate plans for City staff to direct assistance in this way moving forward, financial and logistical support continues.

Addressing the emergency shelter and transitional housing needs of homeless persons

The CoC adopted a Coordinated Entry policy, which ensures people with the greatest needs receive priority for any type of housing and homeless assistance. Coordinated Entry does not screen people out for assistance because of perceived barriers to housing or services including, but not limited to, lack of employment or income, drug or alcohol use, or having a criminal record. Clients are linked to community resources which best meet their immediate and future needs.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that

individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Homeless households are encouraged to obtain an assessment and linkage to available services to help resolve their housing crisis through CAA. Outreach staff is strategically placed in the community to ensure homeless or at-risk households are aware of community resources to prevent or end homelessness. The housing assessment program will continue to assess at-risk households to prevent homelessness by using available prevention resources, shelter diversion tactics, and linkage to mainstream resources to avoid loss of housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Preventing homelessness from occurring at all is the most effective means to avoid trauma to families and the creation of larger crises which might prevent a household from moving forward successfully. CAA receives funding from HUD to operate a rapid re-housing program, providing short-term assistance to persons at risk of becoming homeless. Coordinating with mainstream providers continues to support effective and efficient access to mainstream benefits by eligible participants.

On September 21, 2021, the City of Jackson was notified that it was eligible to receive \$1,137,398 in HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing and Urban Development upon approval of this Allocation Plan. The purpose of this supplemental funding is to provide homelessness assistance and supportive services through several eligible activities, which include: the production or preservation of affordable housing; tenant based rental assistance (TBRA); supportive services (including homeless prevention services and housing counseling); the purchase or development of non-congregate shelters; administration and planning; and Non-profit operating and capacity building assistance. The City’s Allocation Plan was approved by HUD in the Spring of 2023, describing the distribution of HOME-ARP funds and identifying any preferences for eligible activities which primarily assist the HOME-ARP qualifying populations, including: homeless persons; persons at risk of becoming homeless; those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; other populations where assistance would prevent the family’s homelessness or serve those with the greatest risk of housing instability; and, veterans and families that include a veteran family member that meet one of the preceding criteria. The City of Jackson has identified three target areas for funding: rental housing construction, rental housing rehabilitation, and supportive services. These funds must be spent by September 30, 2030.

Discussion

Residents in Action, a local “boots on the ground” nonprofit, is in the process of acquiring the former T.A. Wilson school, for conversion to a formal homeless shelter. RIA is currently leasing a portion of the facility, offering overnight space for homeless individuals and families. 10 Pallet shelters were purchased in 2023, and were used during the winter of 2024 at the T.A. Wilson site. Each shelter can hold two (2) people), for a maximum of 20 possible beds when utilizing these temporary shelters. The pallet shelters are currently in storage for possible use at a later date. The Jackson Interfaith Shelter will soon begin construction of an additional homeless facility near their current location just South of downtown. The

City is partnering with two local housing nonprofit agencies (The Welcome Home Organization and Kings Community Homes), for the creation of homeless transitional housing for qualifying populations with funds from the HOME-ARP program. Construction is expected to begin in Summer 2025.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Conversations with local housing providers and social service agencies reveals affordable housing in Jackson may not necessarily be limited to a specific type of housing but rather addressing the issues that interfere with obtaining housing. Examples of barriers include, but are not limited to, the following:

- Landlords unaware of the laws governing rental housing, including Fair Housing laws and prohibited discriminatory practices.
- Tenants who do not realize their rights as it pertains to rental housing, including Fair Housing laws and awareness of discriminatory practices.
- Exorbitant security deposits, non-refundable application fees, and unaffordable utility deposits
- Inability to obtain utilities in tenant's name.
- Limited public transportation options.
- Poor credit history, especially for youth just out of college, persons facing unexpected life issues, or ruined as part of a domestic violence situation.
- Rejection of service animals in the unit.
- Refusal to accept Housing Choice Vouchers or charging rents not at fair market value
- People who are routinely discriminated against often don't notice or identify discrimination. If discrimination is suspected, the tenants are often more interested in finding housing to meet their immediate need rather than going through a lengthy appeal process.
- Inability to save sufficient funds for a required down-payment for the purchase of a home
- Limited housing stocks at all income levels and price points, but most notably for low-moderate income earners.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Jackson does not intentionally create policies, codes, or rules that create barriers to affordable housing, but rather faces the same realities experienced by most municipalities – increasing construction costs, complexity of financing for larger projects, and an affordability gap between incomes and housing costs. Likewise, most policies, ordinances, and/or codes are established to maintain compliance with local, state, and federal guidelines or for health and safety reasons.

City staff will continue to collaborate with the CoC to develop strategies to remove or ameliorate barriers to affordable housing. The CoC has identified several strategies to implement, including, but not limited to, the following:

- Further the Landlord Advocacy and Education position currently funded for the short term.
- Work with landlords to determine what they would require to expand the number of units available to subsidy.
- Increase the number of landlords willing to rent to Housing Choice Voucher holders.
- Develop a multi-sector strategy to reduce issues involving utilities as a barrier to housing.
- Another concept to increase acceptance of tenants with Housing Choice Vouchers is to establish a fund to assist the private-market landlord with repairing potential damages incurred when accepting an irresponsible Section 8 tenant.

Discussion:

The City's Affordable Housing Development Board regularly provides experience-based advice to staff regarding possible solutions regarding the availability of affordable housing. In conjunction with the 2023 Housing Strategy and Policy Framework, numerous strategies are in place to attack this issue, including the 100 Homes Program and the Expanded Rehabilitation Program (both supported with ARPA funds). Additional new construction projects throughout the City will also offer greater affordable housing options, including single-family and multi-family units in all parts of the City. Local, state, and federal subsidies are being levied to assist with many of these projects, and the City of Jackson is focused on developing multiple housing options that are affordable at various income levels.

AP-85 Other Actions – 91.220(k)

Introduction:

The activities and goals of the 2025-2026 Annual Action Plan coincide with the priorities identified in the 2025-2029 Five-Year Consolidated Plan. Some activities funded during this first year of the Consolidated Plan were planned activities during the prior Consolidated Plan. Other activities are funded to begin the assessment and planning stages of the three local target areas. The City's Housing Rehabilitation Policies and Procedures will undergo review and revision during this AP year.

Actions planned to address obstacles to meeting underserved needs

City staff will continue to maintain its network of state and local public agencies and non-profit service providers. The use of CDBG or HOME funds to meet underserved needs will be subject to fluctuations in annual funding. Funds may or may not be allocated accordingly.

Actions planned to foster and maintain affordable housing

As noted above, the City will assist low-income homeowners with housing maintenance and emergency repairs. In addition, the City's CHDO will develop affordable housing units for resale to qualifying low-income households. In addition, homebuyer activities involve the construction of new single-family homes and the rehabilitation of 16 former LIHTC rental units being purchased by income qualified first-time homebuyers.

The Jackson City Council adopted an Affordable Housing ordinance in late 2021, adding Article IX - Affordable Housing Development Board to its Housing ordinance found at Chapter 14 of the City of Jackson Code of Ordinances. The purpose and intent of adding Article IX to Chapter 14 is to:

- 1) Promote the health, safety, and general welfare of the people of the City of Jackson through the implementation of housing goals, objectives, and policies that support economically integrated housing opportunities in the development or rehabilitation of housing;
- 2) Stimulate the production and preservation of owner-occupied and non-owner occupied housing available to low-income individuals or families; and
- 3) Optimize benefits available to low- and moderate-income residents by incentivizing affordable residential housing projects.

The City continues to leverage additional funds separate from the CDBG and HOME programs for the construction of new affordable housing and the rehabilitation of existing housing. ARPA funds are being used to support down payment assistance for new single-family construction as part of the 100 Homes Program. ARPA funds are also being used for an additional rehabilitation program designed for owner and non owner-occupied properties. MSHDA funds are being used to support the construction of affordable and visitable homes, and for the rehabilitation of existing homes needing energy efficiency improvements. HOME-ARP funds are being used to support the construction of affordable rental housing and the rehabilitation of existing structures. Finally, the City will utilize HOME funds through homebuyer activities, including but not limited to down payment assistance on new construction single-family homes.

Actions planned to reduce lead-based paint hazards

Inspections of non-owner occupied housing units will continue to assess deteriorated paint and will be cited as a violation and ordered repaired before a certificate of compliance is issued to the property owner. Any rehabilitation activities that may disturb painted surfaces in a home will receive a combination lead paint inspection/risk assessment and, if hazards exist, will be treated according to the

Lead Safe Housing Rule. All actions taken to remediate an identified lead hazard must be approved through a lead clearance examination.

Actions planned to reduce the number of poverty-level families

The City of Jackson has neither the facilities nor resources to carry out programs directly targeted at reducing the number of households at or below the poverty level. However, through the use of CDBG and HOME funds, the City offers services and programs to make housing affordable to low- to moderate-income homeowners:

- *Rehabilitation* – up to \$25,000 is available through a 5-year, zero-interest, deferred loan with a partial low repayment component to correct emergency hazards from major system failures.
- *Homebuyer New Construction* – currently under development through the City's CHDO, the Greater Jackson Habitat for Humanity. The 2025-2029 5-Year Consolidated Plan further outlines planned down-payment assistance for those earning less than 80% of the area median income.

In addition, the City ensures tenants have decent, safe, and sanitary living conditions through its Housing Code Enforcement (HCE) program (not federally funded). The HCE program also improves neighborhood living conditions through enforcement of various blight ordinances, such as garbage, inoperable vehicles, noxious weeds and trees, and zoning violations.

City leaders will collaborate with the United Way of Jackson County, the Continuum of Care, the Jackson Interfaith Shelter, the Community Action Agency, Habitat for Humanity, the Welcome Home Organization, Residents in Action, Kings Community Homes, and other community service providers in their efforts to reduce the number of impoverished residents.

Actions planned to develop institutional structure

City staff will continue active participation with the CoC and other collaborative meetings as may be necessary to remain aware of the community's health and emerging needs. Close monitoring of projects implemented by other City departments will ensure compliance with federal rules and regulations and the timely expenditure of CDBG funds. The Greater Jackson Habitat for Humanity will receive technical assistance and guidance by various City staff as its new housing construction project proceeds.

Actions planned to enhance coordination between public and private housing and social service agencies

City staff will continue active participation with the CoC. Members of the CoC represent various public and non-profit agencies in Jackson that provide mainstream and specialized services to homeless, non-homeless special needs, and general populations and subpopulations. Discussion at monthly CoC meetings always includes identification of emerging needs or gaps in service that need attention.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

While similar in many ways, CDBG and HOME are governed under separate federal regulation with certain requirements specific to each grant. The information below addresses those specific requirements.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.	70.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

- 1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

Forms of investment beyond those identified in 24 CFR 92.205 will not be utilized under this plan.

- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

The City of Jackson controls the resale of homebuyer property during the period of affordability using the **recapture** option as follows:

- 1) Should a homebuyer receiving a direct HOME subsidy in the amount of \$5,000 or less and sell the property during the affordability period, repayment of the entire direct HOME subsidy will be triggered.
- 2) Should a homebuyer receiving a direct HOME subsidy in excess of \$5,000 and sell the property during the affordability period, repayment of the direct HOME subsidy will be directly tied to the length of time the homebuyer has occupied the home in relation to the period of affordability.

If there are no net proceeds from the sale or the net proceeds are insufficient to repay the HOME subsidy due, the City will recapture the amount of the net proceeds, if any. Recaptured funds will be used for another HOME-eligible activity. The homeowner will receive a return on investment only if there are remaining net proceeds from the sale after payment of all outstanding mortgages, including the HOME mortgage and closing costs.

- 3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

The City's recapture/resale guidelines for acquired properties are the same as noted above under Paragraph 2.

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

Activities in this plan do not include refinancing of existing debt secured by multifamily housing rehabilitated with HOME funds.

Appendix - Alternate/Local Data Sources

1	<p>Data Source Name</p> <p>Public Housing Information</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Supplemental information was provided by Arturo Puckerin, Executive Director of the Jackson Housing Commission.</p>
	<p>Provide a brief summary of the data set.</p> <p>Various information was provided to complete table fields pre-populated from the PIH Information Center (PIC).</p>
	<p>What was the purpose for developing this data set?</p> <p>To provide a more accurate, overall assessment of Public Housing in Jackson.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>The data was collected from actual information collected by the Jackson Housing Commission for its public housing residents and Housing Choice Voucher recipients.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>The information provided was actual as of March 1, 2025.</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>The data used was "point in time" and, as with most datasets, will change over time.</p>
	2
<p>List the name of the organization or individual who originated the data set.</p> <p>Staff in the City of Jackson's Community Development Department</p>	
<p>Provide a brief summary of the data set.</p> <p>Estimated number of vacant housing units within the City.</p>	
<p>What was the purpose for developing this data set?</p> <p>To provide more detail in the Consolidated Plan than what had been pre-populated by HUD.</p>	

	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Information about demolished foreclosed, vacant or abandoned housing units is actual as of February 1, 2025. Because mortgage and tax foreclosures have been prevalent across the entire City, no one area has been immune to blight through abandonment.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>City staff has been tracking actual information since June 1, 2011.</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>This data set is in progress due to the nature of the activity.</p>