

# JACKSON

Founded 1829

## Community Development Block Grant (CDBG) HOME Investment Partnerships Program (HOME) 2020–2024 Five-Year Consolidated Plan 2020–2021 Annual Action Plan



*Before*



*After*

City of Jackson  
Dept. of Neighborhood & Economic Operations  
161 W Michigan Avenue  
Jackson, MI 49201  
<http://www.cityofjackson.org/332/Grant-Reports>



# Table of Contents

## Executive Summary

ES-05 Overview .....	1
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## The Process

PR-05 Lead and Responsible Agencies .....	5
PR-10 Consultation .....	6
PR-15 Citizen Participation .....	12

## Needs Assessment

NA-05 Overview .....	15
NA-10 Housing Needs Assessment .....	17
NA-15 Disproportionately Greater Need: Housing Problems .....	24
NA-20 Disproportionately Greater Need: Severe Housing Problems .....	27
NA-25 Disproportionately Greater Need: Housing Cost Burden .....	30
NA-30 Disproportionately Greater Need: Discussion .....	31
NA-35 Public Housing .....	32
NA-40 Homeless Needs Assessment .....	35
NA-45 Non-Homeless Special Needs Assessment .....	39
NA-50 Non-Housing Community Development Needs .....	41

## Market Analysis

MA-05 Overview .....	45
MA-10 Number of Housing Units .....	46
MA-15 Cost of Housing .....	49
MA-20 Condition of Housing .....	52
MA-25 Public and Assisted Housing .....	55
MA-30 Homeless Facilities .....	57
MA-35 Special Needs Facilities and Services .....	59
MA-40 Barriers to Affordable Housing .....	61
MA-45 Non-Housing Community Development Assessment .....	62
MA-50 Needs and Market Analysis Discussion .....	67
MA-60 Broadband Needs of Housing .....	69
MA-65 Hazard Mitigation .....	70

## Strategic Plan

SP-05 Overview .....	71
SP-10 Geographic Priorities .....	72
SP-25 Priority Needs .....	77
SP-30 Influence of Market Conditions .....	81
SP-35 Anticipated Resources .....	82
SP-40 Institutional Delivery System .....	84
SP-45 Goals .....	86
SP-50 Public Housing Accessibility and Involvement .....	88
SP-55 Barriers to Affordable Housing .....	89
SP-60 Homelessness Strategy .....	90
SP-65 Lead-Based Paint Hazards .....	91
SP-70 Anti-Poverty Strategy .....	92
SP-80 Monitoring .....	93

**Annual Action Plan**

AP-15 Expected Resources .....95  
AP-20 Annual Goals and Objectives .....97  
AP-35 Projects.....98  
AP-50 Geographic Distribution .....102  
AP-55 Affordable Housing .....104  
AP-60 Public Housing.....105  
AP-65 Homeless and Other Special Needs Activities.....106  
AP-75 Barriers to Affordable Housing .....108  
AP-85 Other Actions .....109  
AP-90 Program Specific Requirements.....111

# 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, 2020 through June 30, 2025, 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 (2020-2021) 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, and New Construction by the City's Community Housing Development Organization (CHDO), the Greater Jackson Habitat for Humanity.

### **Evaluation of past performance**

The City of Jackson demonstrated timely and responsible progress in meeting the goals and objectives stated in the 2015 – 2019 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 28, 2020 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 United Way of Jackson County.

A draft copy of the Consolidated Plan was received by City Council on March 17, 2020 and made available for public review and comment on March 18, 2020. 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 20, 2020. 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

January 28, 2020 Public Hearing – City Council received a letter from the CoC which outlined three potential uses for CDBG funds as follows:

1. Housing rehabilitation and services for elderly citizens allowing them to age in place. In response, the City has provided homeowner rehabilitation through low cost, deferred, and forgivable loans for decades.
2. Waive permit fees or institute a rental rehabilitation program for landlords accepting tenants with Section 8 vouchers. In response, the City waives permit fees for handicap ramps installed by disAbility Connections but is not able to operate an effective Building Inspection service without the revenue to support it. A recent attempt to provide lead hazard control services to landlords housing low-income tenants with children under 6 years of age failed due in part to reluctance of landlords to participate.
3. Cover housing costs, including payment of property taxes and special assessments, for cost burdened low-income homeowners. In response, the City does pay the special assessments charged to very low-income homeowners when associated with a CDBG-funded street reconstruction project when the homeowner applies and is determined eligible. Paying property taxes with CDBG is an ineligible use of funds, as is subsistence payments in excess of three (3) months.

Two citizens spoke at the public hearing. Citizen JK suggested using CDBG to offset the cost of permits to maintain homes and initiate programs to get homeless individuals into properties owned by the City. Citizen PB offered an idea of using CDBG to help with prisoner re-entry.

*Consolidated Plan/Annual Action Plan 30-day Comment Period* – 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 Process

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

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

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	Neighborhood & Economic Operations
HOME Administrator	JACKSON	Neighborhood & Economic Operations

Table 1 – Responsible Agencies

### Narrative

Staff in the City’s Department of Neighborhood & Economic Operations (NEO) 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 subgrantee 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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Department of Neighborhood & Economic Operations  
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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 NEO 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 and served as past co-chair for several years. A four (4) year change in job duties required the Grant Coordinator to step down from the CoC but has recently begun participating again when re-assigned administration of the CDBG and HOME grants. The current Grant Coordinator also served as the Jackson Housing Commission's President of the Board of Commissioners from 2013 through 2017. Due to the increased level of work responsibilities, the Grant Coordinator felt it was a disservice to the Housing Commission to continue serving on the Board.

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.

### **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**

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

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

	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participation through CoC
11	<b>Agency/Group/Organization</b>	Henry Ford Allegiance Health
	<b>Agency/Group/Organization Type</b>	Housing Services: homeless, health Health Agency Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participation through CoC
12	<b>Agency/Group/Organization</b>	United Way of Jackson County
	<b>Agency/Group/Organization Type</b>	Services: housing, children, elderly persons, persons with disabilities, victims of domestic violence, homeless, health, education, employment Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.
Five-Year Plan	Jackson Housing Commission	Five-year plan of the local Public Housing Authority which overlaps in multiple areas relating to the housing needs of the low-income community.
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.

**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 obtain other funding sources to implement its Rental Assistance Demonstration (RAD) conversion 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.

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

**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
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 28, 2020. The Co-Chair from the Jackson County Continuum of Care presented the letter submitted by the CoC; two other citizens spoke during the public hearing.	Housing rehabilitation and services for the elderly allowing them to age in place; waiving permit fees for low-income homeowners and landlords accepting Section 8; rental rehab for landlords accepting Section 8; paying property taxes and special assessments for low-income homeowners; maintain homes to house the homeless; prisoner re-entry.	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.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
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.
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.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
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.
7	Jackson County Continuum of Care	Service Providers	Members were notified of every upcoming step in the citizen participation process and encouraged to attend the public hearing and/or submit comments relative to the Consolidated Plan.	Letter submitted by the CoC; co-chair addressed City Council personally regarding letter contents (see public hearing above).	See public hearing 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 2011-2015 Five-Year Estimates (2015 ACS). The subsequent pages provide a summary of the City's needs projected 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 which is 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 boundaries and the needs of public housing residents.

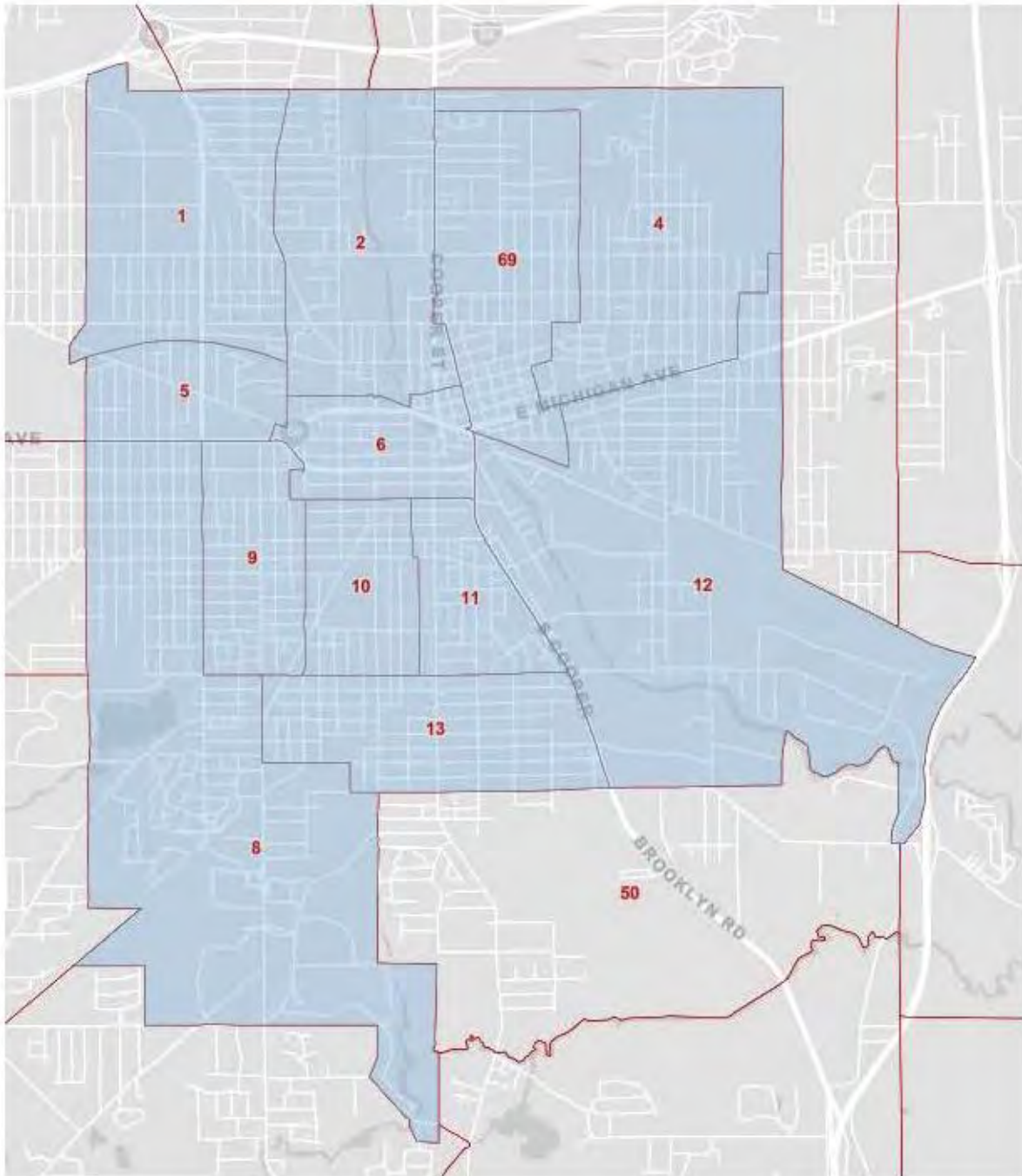
**Homeless Needs Assessment** - describes the nature and extent of homelessness within the City of Jackson. Data from the Homeless Management Information System (HMIS) and the Point in Time (PIT) count is used as a baseline for this section. Estimates are provided regarding the number of persons experiencing 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.

# 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.

Although the median housing cost for homeowners with a mortgage is \$894 and gross median rent is \$652, tenants are more likely to fall under either the cost burdened or severely cost burdened categories. For instance, 43.3% of renters with incomes below 80% of the area median income (AMI) are cost burdened and 26.0% are severely cost burdened. Conversely, only 18.5% of homeowners with incomes below 80% AMI are cost burdened and 9.5% severely cost burdened. Data from the 2015 ACS Table S2503: Financial Characteristics indicates 42.3% of both owners and renters in the City of Jackson are cost burdened; however, when considered individually, only 27.9% of homeowners experience cost burden while 56.9% of all renters find housing unaffordable.

Demographics	Base Year: 2009	Most Recent Year: 2015	Pct. Change
Population	33,534	33,255	-1%
Households	13,696	12,650	-8%
Median Income	\$32,167.00	\$28,087.00	-13%

**Table 5 - Housing Needs Assessment Demographics**

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	3,210	1,970	2,485	1,125	3,860
Small Family Households	1,390	730	1,050	380	1,535
Large Family Households	365	165	180	85	435
Household contains at least one person 62-74 years of age	300	455	445	330	730
Household contains at least one person age 75 or older	100	200	320	115	290
Households with one or more children 6 years old or younger	1,050	344	524	154	530

**Table 6 - Total Households Table**

Data Source: 2011-2015 CHAS

HAMFI: HUD Area Median Family Income

## Housing Needs Summary Tables

### 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	25	30	0	85	4	0	25	0	29
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	35	55	4	0	94	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	105	0	15	0	120	4	0	4	20	28
Housing cost burden greater than 50% of income (and none of the above problems)	1,470	365	15	4	1,854	465	200	75	10	750
Housing cost burden greater than 30% of income (and none of the above problems)	325	365	565	115	1,370	115	290	250	150	805
Zero/negative Income (and none of the above problems)	230	0	0	0	230	40	0	0	0	40

**Table 7 – Housing Problems Table**

Data Source: 2011-2015 CHAS

AMI = Area Median Income

### 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	1,635	450	60	4	2,149	475	200	105	30	810
Having none of four housing problems	655	710	1,185	450	3,000	175	610	1,135	640	2,560
Household has negative income, but none of the other housing problems	230	0	0	0	230	40	0	0	0	40

**Table 8 – Housing Problems 2**

Data Source: 2011-2015 CHAS

AMI = Area Median Income

### Cost Burden > 30%

	Number of Households - Renter				Number of Households - Owner			
	0-30%	>30-50%	>50-80%	Total	0-30%	>30-50%	>50-80%	Total
	AMI	AMI	AMI		AMI	AMI	AMI	
Small Related	1,000	320	265	1,585	185	140	155	480
Large Related	310	75	40	425	15	35	10	60
Elderly	135	164	120	419	190	190	115	495
Other	500	235	155	890	190	130	60	380
Total need by income	1,945	794	580	3,319	580	495	340	1,415

Table 9 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

### Cost Burden > 50%

	Number of Households - Renter				Number of Households - Owner			
	0-30%	>30-50%	>50-80%	Total	0-30%	>30-50%	>50-80%	Total
	AMI	AMI	AMI		AMI	AMI	AMI	
Small Related	835	130	0	965	140	70	40	250
Large Related	275	40	0	315	0	0	0	0
Elderly	115	64	15	194	150	70	15	235
Other	385	135	0	520	170	60	15	245
Total need by income	1,610	369	15	1,994	460	200	70	730

Table 10 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

### Crowding (More than one person per room)

	Number of Households - Renter					Number of Households - Owner				
	0-30%	>30-50%	>50-80%	>80-100%	Total	0-30%	>30-50%	>50-80%	>80-100%	Total
	AMI	AMI	AMI	AMI		AMI	AMI	AMI	AMI	
Single family households	130	25	19	0	174	4	0	4	0	8
Multiple, unrelated family households	30	0	0	0	30	0	0	0	20	20
Other, non-family households	0	30	0	0	30	0	0	0	0	0
Total need by income	160	55	19	0	234	4	0	4	20	28

Table 11 – Crowding Information – 1 of 2

Data Source: 2011-2015 CHAS

**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 2015 American Community Survey, there are an estimated 12,650 total households of which 5,173 are estimated to be non-family households (or 40.9%). Of the non-family households, an estimated 4,211 are single person households (householder living alone) which equates to 33.3% of total households or 81.4% of all non-family households.

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 the tables above is required to determine the estimated number of single person households needing housing assistance by applying the 81.4% to the "Other" category.

Housing Problem	Renters	Owners
Cost Burden (>30%)	724	309
Cost Burden (>50%)	423	199
Crowding	24	23

Because 33.3% of all City of Jackson households are single person households, this percentage could be applied to all categories and income levels in Tables 7 and 8 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.**

Although HUD and the Census/American Community Survey do not provide specific data to respond to this question, extrapolations can be made using the available data. Relying on 2015 American Community Survey tables, approximately 17.8% of the non-institutionalized population claims a disability. This is further subdivided to indicate 8.7% of persons under 18 years of age, 18.5% of persons 18 to 64 years old, and 42.0% 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 2017 inflation-adjusted dollars) by disability status and sex for the civilian non-institutionalized population 16 years and over. This table reports the total median income for the City of Jackson is \$22,385 and is further delineated as follows:

- With a disability            \$13,147 (41.3% less than total)
  - Male                        \$17,238 (23.0% less than total)
  - Female                     \$10,923 (51.2% less than total)
  
- No disability                \$23,639 (5.6% more than total)
  - Male                        \$26,862 (20.0% more than total)
  - Female                     \$20,484 (8.5% 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 17.8%; 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, 2017 through September 30, 2018. During that year, 127 survivors of domestic and sexual violence received crisis support through individual counseling services and support groups. Emergency shelter was provided to 147 adults and 96 children as a safe and supportive setting for a total of 4,955 nights of shelter. AWARE provided 792 supervised visits and 401 exchanges, serving an average of 36 families per month. One hundred forty-seven (147) adults and 103 children received individual advocacy such as assistance with housing, employment, economic empowerment skills, childcare resources, transportation, and referral to other community resources. Legal advocacy services were provided to 207 adults and children seeking remedies through the courts, including court accompaniment, victim notification, outreach, safety planning, or referrals.

### **What are the most common housing problems?**

Cost burden is the most common housing problem for both renters and homeowners. Nearly one-half of the tenants in the City of Jackson (49.2%) earn \$20,000 or less annually and a majority need more than 30% of their gross income to pay for housing. Another 23.5% of renters earn \$20,000 to \$34,999 per year with more than half still experiencing cost burden. Subsequent income levels include \$35,000 to \$49,999 (9.8% of tenants), \$50,000 to \$74,999 (9% of tenants) and \$75,000 or more (3% of tenants); those reporting a cost burden at these higher income levels do not exceed 2% at any given level.

Conversely, the most common income level for homeowners is in the \$50,000 to \$74,999 range (22.7%) followed by income at \$75,000 or more (20.8%). Less than 1% of homeowners at these income levels experience cost burden. The most cost burdened homeowners are those earning \$20,000 or less (15.4% report a cost burden). An estimated 20.7% of homeowners earn less than \$20,000 per year with 19.9% of homeowners earning \$20,000 to \$34,999 per year.

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

The percentage of extremely low income (earning less than 30% AMI), very low income (earning 30% to 50% AMI), and low-income (earning 50% to 80% AMI) renters experiencing cost burden is 60.6%, 40.3%, and 23.3%, respectively. While being cost burdened also affects homeowners, the very low income households experience it more than their extremely low income and low income counterparts (25.1% compared to 18.1% and 13.7%). This is likely due to extremely low income families being unable to purchase their own home.

Approximately one-half of extremely low income renters are severely cost burdened as are 18.7% of very low income renters. Low income renters fare better as less than 1% report being severely cost burdened. Again, homeowners are less likely to be severely cost burdened with 14.3% of extremely low, 10.2% of very low, and 2.8% of low income reporting this housing problem.

### **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 Point-in-Time (PIT) Count conducted in 2019 indicated Jackson had 97 homeless persons, 84 of which were sheltered and 13 unsheltered. Seventy-seven (77) homeless persons were individuals while 23 persons made up homeless families with children. Seven (7) persons were counted as chronically homeless with all sheltered at the time of the count. Seven (7) persons were listed as homeless veterans with one (1)

being unsheltered. Seven (7) unaccompanied youth aged 18 to 24 years old were counted with one (1) 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:**

The population most at-risk of becoming homeless is households earning less than 30% AMI and being severely 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 for 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 the City of Jackson, Fair Market Rent (FMR) for a three (3) bedroom apartment is \$1,031 per month. In order for 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 over \$41,000. The housing wage for this theoretical family is \$19.83 which would require 2.1 full time jobs at Michigan's current minimum wage (\$9.45 per hour).

Assuming this same family's gross income was \$19,400 (30% AMI for 2019), affordable rent for a three (3) bedroom apartment would be \$485 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 65% of its gross income for a three (3) bedroom apartment at FMR.

## **Discussion**

Between 2012 and 2019, 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;
- **The 200** - \$13 million mixed use development in downtown offering 86 market rate units;
- **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.

- **Albert Kahn Apartments** - \$17 million mixed use project housing 73 low-income apartments on upper floors. This project also received LIHTC from the State of Michigan.

City of Jackson leaders assisted these multi-million dollar projects from the planning stages through obtaining tax credits. Jackson is using its CDBG and HOME funds to increase affordable housing options as follows:

- **Downtown Investor Owned Rehabilitation** – this CDBG activity converted vacant upper floors in downtown commercial buildings into eight (8) affordable housing units.
- **Habitat for Humanity** – recently certified to serve as the City’s Community Housing Development Organization (CHDO), Habitat will create up to three (3) new single family homes for resale to income-qualified individuals or families during its initial phase. Habitat has also partnered with Community Action Agency to build two (2) additional single family homes with Youth Build funds.

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 slowly expanding into the surrounding neighborhoods. The eventual goal is to create an urban environment attractive to entrepreneurial investment.

Unfortunately, the City lacks sufficient resources to directly impact the cost burden issues experienced by its low income residents. Rather, it relies on its public housing agency, non-profit community service providers, and faith based organizations to support these citizens and bridge gaps.

## 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	2,550	390	270
White	1,545	215	170
Black / African American	845	159	100
Asian	14	10	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	90	4	0

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

### 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	1,310	665	0
White	1,025	465	0
Black / African American	205	165	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	55	10	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

## 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	980	1,505	0
White	650	1,145	0
Black / African American	255	260	0
Asian	30	4	0
American Indian, Alaska Native	10	4	0
Pacific Islander	0	0	0
Hispanic	14	45	0

**Table 14 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2011-2015 CHAS

## 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	305	820	0
White	255	650	0
Black / African American	45	105	0
Asian	0	14	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	4	35	0

**Table 15 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2011-2015 CHAS

## Discussion

The Housing Needs Assessment (NA-10) indicates a total of 12,650 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 12,650. 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 20.2%. A disproportionately greater needs exists for both extremely low-income White (60.6%) and Black/African American (33.1%) residents.

### 30 – 50% AMI

The percentage of very low-income residents experiencing one (1) or more of four (4) housing problems is 10.4%. A disproportionately greater needs exists for very low-income White residents (78.2%) while only 15.6% of very low-income Black/African American households report housing problems which is less than 10 percentage points above the City as a whole.

**50 – 80% AMI**

The percentage of low-income residents experiencing one (1) or more of four (4) housing problems is 7.7%. A disproportionately greater needs exists for both low-income White (66.3%) and Black/African American (26.0%) households.

**80 – 100% AMI**

The percentage of moderate-income residents experiencing one (1) or more of four (4) housing problems is 2.4%. A disproportionately greater needs exists for both moderate-income White (83.6%) and Black/African American (14.8%) citizens.

In summary, slightly more 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 10.4% have one (1) or more housing problems, while 7.7% of those earning 50% - 80% and 2.4% 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, except for Black/African American households earning 30% to 50% AMI. 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	2,110	830	270
White	1,260	500	170
Black / African American	700	300	100
Asian	14	10	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	75	24	0

Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

### 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	650	1,320	0
White	535	955	0
Black / African American	69	300	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	25	40	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

## 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	165	2,320	0
White	150	1,650	0
Black / African American	4	510	0
Asian	10	19	0
American Indian, Alaska Native	0	14	0
Pacific Islander	0	0	0
Hispanic	0	60	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

## 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	34	1,090	0
White	34	865	0
Black / African American	0	150	0
Asian	0	14	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	40	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

## Discussion

The Housing Needs Assessment (NA-10) indicates a total of 12,650 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 12,650. 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 16.7%. A disproportionately greater needs exists for both extremely low-income White (59.7%) and Black/African American (33.2%) residents.

### 30 – 50% AMI

The percentage of very low-income residents experiencing one (1) or more of four (4) severe housing problems is 5.1%. A disproportionately greater needs exists for very low-income White residents (82.3%) while only 10.6% of very low-income Black/African American households report housing problems which is less than 10 percentage points above the City as a whole.

### 50 – 80% AMI

The percentage of low-income residents experiencing one (1) or more of four (4) severe housing problems is 1.3%. A disproportionately greater needs exists for low-income White households

(90.2%) while only 2.4% of low-income Black/African American households report housing problems which is less than 10 percentage points above the City as a whole.

**80 – 100% AMI**

The percentage of moderate-income residents experiencing one (1) or more of four (4) severe housing problems is 0.3%. A disproportionately greater need exists for moderate-income White citizens (100.0%).

Nearly 17% 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 5.1% have one or more severe housing problems, while 1.3% of those earning 50% - 80% and 0.3% of households earning 80% - 100% AMI 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 at the extremely low income level 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 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.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	7,240	2,365	2,765	280
White	5,620	1,645	1,790	180
Black / African American	1,210	590	785	100
Asian	50	15	14	0
American Indian, Alaska Native	8	10	4	0
Pacific Islander	4	0	0	0
Hispanic	240	80	100	0

**Table 20 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2011-2015 CHAS

### Discussion:

The Housing Needs Assessment (NA-10) indicates a total of 12,650 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 12,650. 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.

More than half of households within the City of Jackson (57.2%) 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 18.7% in the City with only the White population exhibiting a greater disproportionate need at 69.6%. At this income level, 24.9% of the Black community suffer a cost burden, which is less than ten (10) percentage points above all households.

Similarly, 21.9% of households within the City of Jackson experience a severe cost burden by using over 50% of its gross income for housing. Black/African American residents do not experience a disproportionate need as 28.4% report a severe cost burden, which is less than ten (10) percentage points over all households. However, White households do display a greater disproportionate need as 64.7% face a severe cost burden.

## 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
- 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
- 50% - 80% AMI: White Households
- 80% - 100% AMI: White Households

#### Any Cost Burden

- White Households

#### No/Negative Income

- White Households
- Black/African American 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 average poverty level for all people in the City of Jackson is 36.0%; seven (7) census tracts with 40% or more of the population living below poverty course through the middle third of the City from north to south. Of these extremely impoverished census tracts, only Census Tract 11 and Census Tract 13 have non-White populations of 50% or greater (76.6% and 58.3% respectively).

## 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.

### Totals in Use

	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 in use	0	0	533	467	0	467	0	0	0

**Table 21 - 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				
				Total	Project - based	Tenant - based	Special Purpose Voucher 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 22 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher 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

**Table 23 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

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

## Ethnicity of Residents

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

**Table 24 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

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

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

Jackson has a shortage of fully accessible housing units. The JHC has four (4) fully accessible units - two (2) at Reed Manor and one (1) each at Chalet Terrace and Shahan-Blackstone North. 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%. Consultation with the Executive Director of the JHC revealed if forty (40) fully accessible units were made available today, they would be immediately filled.

### 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 2018 HMIS data to capture a full year of information, and the 2019 PIT Count conducted on January 30, 2019.

### 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)	23	0	0	232	0	0
Persons in Households with Only Children	0	0	0	2	0	0
Persons in Households with Only Adults	77	13	0	310	0	0
Chronically Homeless Individuals	7	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	6	1	0	30	0	0
Unaccompanied Child	6	1	0	33	0	0
Persons with HIV	0	0	0	0	0	0

Table 25 - Homeless Needs Assessment

There is not a rural homeless population within the City of Jackson.

**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 2018 HMIS data provides a full year of statistics for Jackson's homeless population. The majority of homeless individuals and families were located within the City of Jackson due to the accessibility of emergency shelters and various resources.

A total of 1,023 individuals were literally homeless (Category 1) during 2018. The average age of the adults was 32; females averaged 29 years of age while males were approximately 34. Just over 24% of homeless persons in 2018 were under 18 years of age. By race and ethnicity, 61.6% were White, 36.4% were Black/African American, 1.2% were American Indian/Alaska Native; the other 0.6% were either Asian (0.2%), declined to answer (0.3%), or the data was not collected (0.1%). Those homeless individuals claiming a Hispanic or Latino heritage accounted for 6.2%. One-half of the homeless persons served in 2018 were on the street for the first time since 2015; 19.4% were experiencing a second homeless event since 2015; 12.3% were homeless for the third time in three (3) years; and 17.7% had been homeless four (4) or more times in three (3) years.

Persons aged 25 to 34 years old was the most common age bracket amongst homeless persons in 2018 (21%) with other age groups as follows (in descending order): 35 to 44 (17.4%); 45 to 54 (15.7%); newborn to four (4) years old (10.2%); 18 to 24 and 55 to 64 (9.8% each).

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered</b>
White	59	12
Black or African American	33	0
Asian	0	0
American Indian or Alaska Native	2	1
Pacific Islander	0	0

<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered</b>
Hispanic	5	1
Not Hispanic	0	0

**Data Source Comments:** Six (6) persons of two or more races were sheltered.

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

The 2019 PIT Count identified seven (7) homeless family households comprised of both adults and children consisting of seven (7) persons over age 24, and 16 persons under the age of 18. In 2018, there were a total of 179 homeless families consisting of 201 adults and 250 children. Approximately 54% of homeless families were adult women, while the largest percentage of children was aged newborn to four (4) years old (42.4%).

During 2018, HMIS did not capture any families of veterans as being homeless. Community Action Agency (CAA) receives annual Supportive Services for Veteran Families (SSVF) funding from the Department of Veterans Affairs which is used to rapidly re-house homeless Veteran families and prevent homelessness for those at imminent risk due to a housing crisis.

**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 2018 at 61.6%. The Black/African American community was the second highest percentage racial group experiencing homelessness at 36.6%, followed by American Indian/Alaska Natives at 1.2%. The percentage of 2018 homeless persons claiming a Hispanic/Latino ethnicity was 6.2%.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

The 2019 PIT Count captured a total of 97 homeless households consisting of 113 persons. Of those, approximately 88.5% persons were sheltered and 11.5% were unsheltered. The unsheltered population was all single person adult households, although one (1) unsheltered homeless person was aged between 18 and 24 years old.

**Discussion:**

According to the 2019 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:

**AWARE Shelter**

30 total beds (22 family beds, 8 adult-only beds)

**Jackson Interfaith Shelter**

88 total beds (46 family beds, 32 adult-only beds, 10 overflow/voucher beds)

**Region 2 Area Agency on Aging**

7 total beds (motel voucher)

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

**Community Action Agency**

50 total beds (34 family beds, 16 adult-only beds)

**McKinney, LLC**

4 total HUD-VASH beds (veterans, adult-only)

**Training & Treatment Innovations**

49 total beds (33 family beds, 16 adult-only beds)

An additional 76 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 2015 ACS, 13.2% of the City's residents are aged 62 and over, 4.6% of which are aged 75 and over. Nearly 30% of households report having one (1) or more people over 60 years of age living with them while 58.2% of people over 65 years live alone.

Nearly 18% of City residents report a disability, more than half (52.7%) among those over 75 years of age. 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 19.9% (White is 17.5%). In addition, an estimated 6.9% 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 2015 ACS information, 21.8% of occupied housing is comprised of four (4) or more persons with the greater share renting versus owning their home. 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 15.2% 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.

Non-family households are most common in the City at 40.9% and are comprised of mostly single person households. Married couple families encompass 31.7% of the City's family households, followed by female heads of household (23.5%); male heads of household is least common at 4.6%. Approximately 65% of the female head of household families have children under 18 years present in the home. Summarily, a larger percentage of women live below poverty than men which correlates to the fact that overall, women earn 16.8% 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.

### **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 placemaking 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. Each of the three (3) identified target areas will undergo a 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.

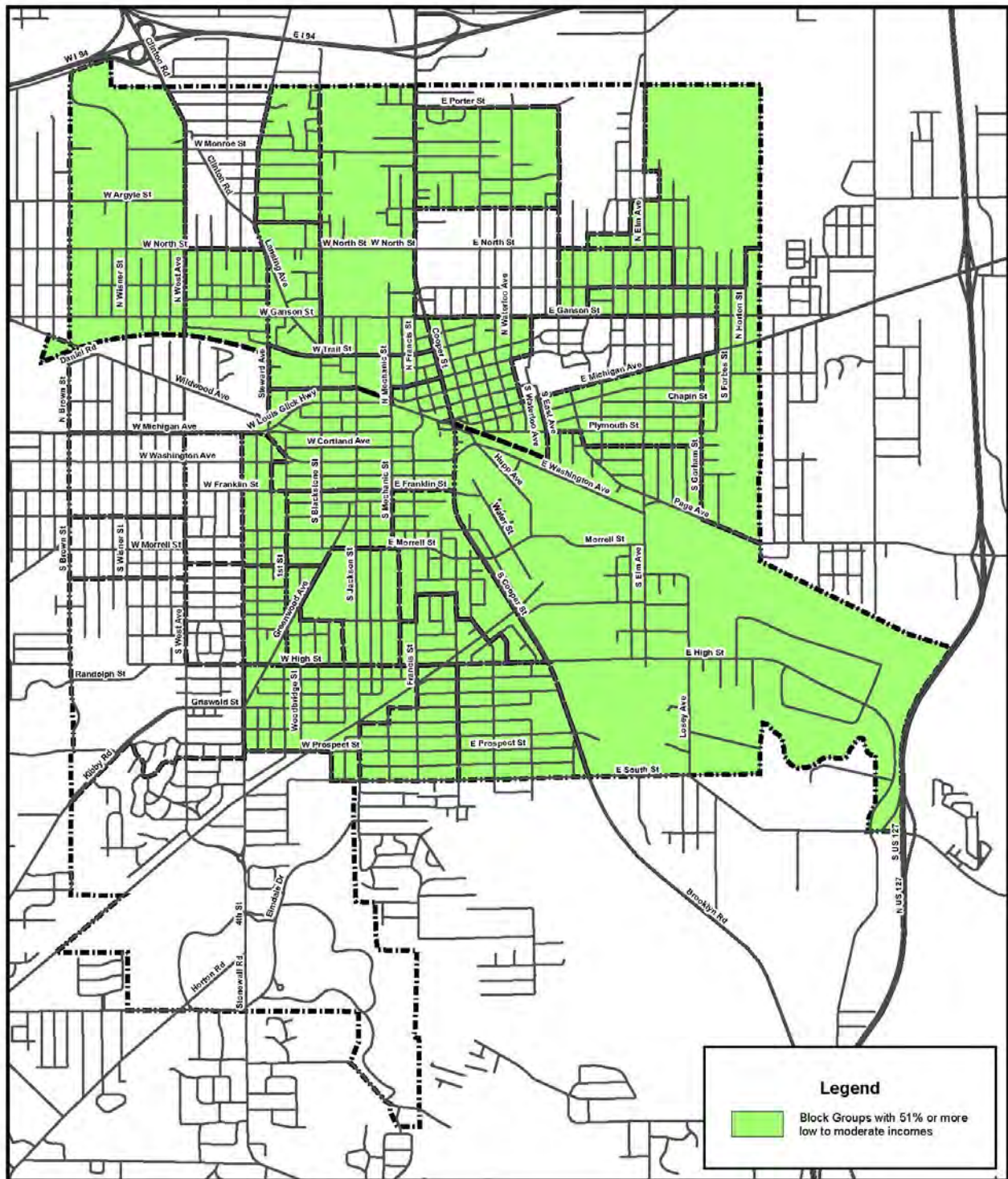
### **Describe the jurisdiction's need for Public Services:**


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.

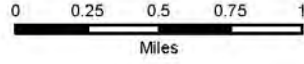
A new collaborative effort to address poverty and "Asset Limited, Income Constrained, Employed" (ALICE) lead by the United Way of Jackson County has been initiated to develop partnerships, invest in programs and work with policymakers, and help ALICE households get past barriers and build financial stability. 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.





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COMMUNITY DEVELOPMENT  
BLOCK GRANTS**



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Miles

Date Prepared: April 1st, 2019



# 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. Eighty (80) years later, the 2010 Census reports 33,534 residents occupied 13,294 housing units leaving 2,163 housing units vacant or abandoned. This equates to a nearly 40% decline in population with only a 7% decrease in occupied housing units; if vacant units are considered, available housing actually increased over 8%. 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 in seven (7) 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 62% 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. Overall, the City's median gross rent is \$652 as reported by the 2015 ACS; however, the median gross rent by Census Tract ranges from \$314 to \$820 per month. By comparison, median gross rent for the United States is \$928, the State of Michigan \$783, and the County of Jackson \$728.

Between the 2000 Census and the 2015 ACS, median gross rents have increased 41% while median household income has decreased 10%; the number of subsidized housing units and Housing Choice Vouchers are insufficient for the number of households requiring affordable housing. Worse yet, many landlords are reluctant to rent to tenants holding vouchers even though doing so is a violation of the City's Fair Housing Ordinance.

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

### Introduction

According to the 2015 ACS, the data HUD used to pre-populate this Consolidated Plan, Jackson has a total of 14,787 housing units, 85.5% of which are occupied (12,650 housing units). Jackson is primarily comprised of residential structures on small lots with nearly 50% of its housing stock built before 1940. Seventy (70%) percent of the City’s housing stock is detached or attached single family homes followed by two (2) to four (4) unit residential structures (13%). 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. Seventeen (17%) 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 2.63 persons per housing unit (33,255 total population / 12,650 occupied housing units); however, one-third of Jackson’s residents report living alone (4,212). Deducting the number of single person households from the total increases the average number of persons per housing unit to 3.44. Approximately one-quarter of the renter population is comprised of four (4) or more persons per housing unit, averaging 5.75 persons per household. While owner-occupied units with four (4) or more persons per housing unit accounts for less than 20% of all occupied homeowner housing, the average persons per household is 6.59.

### All residential properties by number of units

Property Type	Number	Percent
1-unit detached structure	9,895	67%
1-unit, attached structure	415	3%
2-4 units	1,970	13%
5-19 units	1,295	9%
20 or more units	1,130	8%
Mobile Home, boat, RV, van, etc	85	1%
<b>Total</b>	<b>14,790</b>	<b>100%</b>

Table 26 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	Percent	Number	Percent
No bedroom	10	0%	360	6%
1 bedroom	195	3%	1,280	20%
2 bedrooms	1,770	28%	2,290	37%
3 or more bedrooms	4,415	69%	2,325	37%
<b>Total</b>	<b>6,390</b>	<b>100%</b>	<b>6,255</b>	<b>100%</b>

Table 27 – Unit Size by Tenure

Data Source: 2011-2015 ACS

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

Nearly ten (10%) percent of the City’s housing units 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) administers 27 Permanent Supportive Housing units and Training and Treatment Innovations (TTI) administers ten (10) Permanent Supportive Housing units for a total of 99 beds. 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, approximately 700 more 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 has been approved for a Rental Assistance Demonstration (RAD) conversion which will change the type of federal housing assistance from public housing to project-based vouchers. The RAD conversion allows the JHC to obtain other funding sources such as LIHTC or state/local grants to repair their properties.

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

- **Francis Senior Lofts** - \$9.5 million project offering 45 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.
- **Albert Kahn Apartments** - \$17 million mixed use project housing 73 low-income apartments on upper floors. This project also received LIHTC from the State of Michigan.

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

Between 2012 and 2019, the City of Jackson demolished 765 residential structures containing 1,127 housing units that were foreclosed, vacant, abandoned, and dilapidated creating blight and lowering property values of remaining housing in neighborhoods where they were sited. This blight removal strategy began in part due to a 40% population decline between the 1930 and 2010 Census compared to only a 1.8% reduction of housing units. Without a sufficient number of residents to occupy and maintain the existing housing stock, coupled with other factors affecting the housing market such as significant value loss and negligent real estate investors, the older housing fell into substantial disrepair. Demolition was the only option available to City leaders as the cost to rehabilitate the large number of rapidly decaying houses was cost prohibitive and would take decades to accomplish, thereby having little impact on the community. Although there has been some outcry from a few housing advocates, the extremely poor condition of these structures was not conducive to habitation and most definitely not affordable.

To determine if there are sufficient housing units to meet the needs of the population, the total population (33,255) is divided by the average household size (2.57) which estimates 12,953 housing units are needed. The 2010 Census reported 15,457 housing units; deducting 1,127 units demolished, the available housing stock is approximately 14,330. The 2015 ACS estimates 14,787 housing units exist with 14.5% being vacant (2,137

vacant housing units). At this time, it appears the City of Jackson still has an excess of housing units compared to the population needed to own and properly maintain.

**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 applied to the State to hire a 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.

**Discussion**

Rapidly increasing rents has resulted in housing units not affordable to low-income households. Between the 2000 Census and the 2015 ACS, median rent in the City of Jackson has increased 41% while median household income decreased over 10% and persons living below the federal poverty level have nearly doubled. 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 having to pay 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 2015 ACS, the median home value in the City of Jackson is \$62,500 which is approximately 44% lower than the median value of Jackson County homes. By comparison, the median home value in the State of Michigan is \$122,400 and across the United States it is \$178,600. As demonstrated in Table 29 below, the 2008 recession devalued median home values in the City by 32% while median contract rents increased 4%. In fact, the City's median home value is \$1,800 lower than that reported in the 2000 Census. City homeowners with a mortgage are more cost burdened (32.5%) than homeowners in the County (28.6%) and Michigan (28.8%) but are in line with the U.S. (32.5%). Even without the burden of a mortgage, 20.9% of homeowners in the City pay more than 30% of their income for housing costs, compared to 13.9% in the County, 16% in the state, and 14.7% across the United States.

Discussed previously, the median gross rent in the City increased 41% since the 2000 Census, while median household income decreased approximately 10%. 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. A person earning Michigan's current minimum wage of \$9.45 per hour would need to work 54 hours a week to afford a modest one-bedroom apartment. The amount to afford more bedrooms increases as follows:

- 2 bedrooms      66 hours/week
- 3 bedrooms      84 hours/week
- 4 bedrooms      92 hours/week

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	Pct Change
Median Home Value	91,800	62,500	(32%)
Median Contract Rent	514	534	4%

**Table 28 – Cost of Housing**

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	Pct
Less than \$500	2,720	43.5%
\$500-999	3,480	55.6%
\$1,000-1,499	55	0.9%
\$1,500-1,999	4	0.1%
\$2,000 or more	0	0.0%
<b>Total</b>	<b>6,259</b>	<b>100.0%</b>

**Table 29 - Rent Paid**

Data Source: 2011-2015 ACS

## Housing Affordability

Units Affordable to Households Earning	Renter	Owner
30% HAMFI	930	No Data
50% HAMFI	2,190	1,330
80% HAMFI	4,870	2,675
100% HAMFI	No Data	3,369
<b>Total</b>	<b>7,990</b>	<b>7,374</b>

**Table 30 – Housing Affordability**

Data Source: 2011-2015 CHAS

HAMFI: HUD Area Median Family Income

## Monthly Rent

Monthly Rent Limits	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	614	660	807	1,031	1,134
High HOME Rent	614	660	807	1,031	1,134
Low HOME Rent	566	606	727	840	937

**Table 31 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

### Is there sufficient housing for households at all income levels?

In the Housing Needs Assessment (NA-10), Table 6 indicates there are 3,210 households earning 0% to 30% of the HUD Area Median Family Income (HAMFI). It should be noted that using HAMFI versus Area Median Income (AMI) comparisons does not allow for the determination if there is sufficient housing for all households at all income levels. The definition of “family” by the Census Bureau (as used in HAMFI) includes only persons related by blood, marriage, or adoption, thereby excluding single-person households and unrelated individuals living together.

With that caveat in mind, comparing the information to Table 30 above, there are approximately 930 rental units affordable to families earning 30% HAMFI (no data was available for homeowner units). It can be assumed then, that 71% of families earning 30% HAMFI are living in units they cannot afford, which is also supported by the percentage of cost burdened and severely cost burdened households earning 30% HAMFI noted above.

It should be considered that what may appear to be a sufficient pool of housing for households at all income levels may not actually be the case due to the dissimilarity of two different definitions of income (HAMFI / AMI) promulgated by HUD throughout the Consolidated Plan. The fact there is no homeowner data available regarding households earning 30% HAMFI is likely due to negligible, if any, numbers of households at that income level owning homes.

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

Table 28 above indicates homeowner housing values fell 32% while contract rent prices increased 4% between 2009 and the 2015 ACS. The decline in homeowner housing values can be attributed to the housing bubble and recession in 2008. Housing prices peaked in 2006 then started declining as the housing bubble burst, hitting lows in 2012. Subprime lending to people who were unable to maintain the repayment schedule led to a spate of mortgage and tax foreclosures and, ultimately, to the recession in 2008. A review of the median housing value listed in the 2013 – 2017 American Community Survey does indicate a slight increase in median value to

\$63,200. Verbal reports from local realtors indicate housing in areas of the City has increased in sales price and appear to be recovering well.

The term “contract rent” often refers to rent paid to landlords through Housing Choice Vouchers. Comparing the median gross rent from the 2008 – 2012 American Community Survey (\$621), to the 2015 ACS (\$652), to 2013 – 2017 American Community Survey (\$662) indicates gross rent increased 5% and continues to climb. The removal of over 1,100 blighted housing units through demolition has tightened the rental market, thus allowing rents to increase as the demand for rental units increase and the supply is limited. As mentioned previously, two (2) new housing projects in Downtown Jackson will produce 118 low income housing units in the near future.

### **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 (\$51,700) would find monthly rent (including utilities) of \$1,293 affordable based on HUD’s definition of affordable (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 (\$32,300) might be able to afford a two-bedroom unit. 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.

As mentioned previously, two (2) new housing projects in Downtown Jackson will produce 118 low income housing units in the near future which will improve availability.

### **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 2015 ACS estimate of 33,255, a loss of nearly 40% of the population. Unfortunately, housing did not follow the same trend, recording a loss of approximately 12.2% from the high recorded in 1960 (16,843) to the 2015 ACS estimate of 14,787 units. In fact, the number of housing units increased 1.4% between the 2000 Census (15,241) and 2010 Census (15,457) which had more to do with real estate investors subdividing current housing stock into multiple units than new construction.

Jackson is primarily comprised of residential structures on small lots. Fifty (50%) percent of all homes within the City were built before 1940; over 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 1,100 dilapidated housing units in the past seven (7) years and enhanced its housing inspections to biennially inspect all housing not used as the primary residence of the owner.

### Definitions

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	Percent	Number	Percent
With one selected Condition	1,760	28%	3,295	53%
With two selected Conditions	50	1%	225	4%
With three selected Conditions	0	0%	20	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	4,580	72%	2,725	44%
<b>Total</b>	<b>6,390</b>	<b>101%</b>	<b>6,265</b>	<b>101%</b>

Table 32 - Condition of Units

Data Source: 2011-2015 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	Percent	Number	Percent
2000 or later	84	1%	145	2%
1980-1999	130	2%	1,040	17%
1950-1979	1,545	24%	2,030	32%
Before 1950	4,625	72%	3,035	48%
<b>Total</b>	<b>6,384</b>	<b>99%</b>	<b>6,250</b>	<b>99%</b>

**Table 33 – Year Unit Built**

Data Source: 2011-2015 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	Percent	Number	Percent
Total Number of Units Built Before 1980	6,170	97%	5,065	81%
Housing Units build before 1980 with children present	538	8%	68	1%

**Table 34 – Risk of Lead-Based Paint**

Data Source: 2011-2015 ACS (Total Units) 2011-2015 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 35 - Vacant Units**

Data Source: 2005-2009 CHAS

## Need for Owner and Rental Rehabilitation

Approximately 50% 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 80 years old. The next three (3) decades, between 1940 and 1969, the City 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 2019 Low-Mod Income Summary Data (LMISD) indicates that 62% of City residents are low-income. The City exhibits extremes of this percentage depending on where a person lives from a low of 22.9% low-income residents in the area bordered by Michigan–West–Carlton–Brown to a high of 92.8% low-income residents in the area principally bordered by Franklin–Cooper–Moore (also includes the Martin Luther King Center and Chalet Terrace area)–Chittock/Mechanic.

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 a sufficient number of homeowners to have an impact on the community.

Historically, the City has offered affordable full rehabilitation loans and emergency hazard loans to low-income homeowners. Full rehabs correct all code violations, lead-based paint hazards, and major components if in jeopardy of failing within 5 years due to age. Emergency hazards correct a system that has already failed – furnace not working, roof leaking, etc. During the course of this Consolidated Plan, the City will explore ways to provide aid to more residents with the limited resources it receives.

One (1) idea in the beginning phases of planning is to create a “Major Component” aspect to the Rehabilitation Policies and Procedures. Early visioning would develop a program to replace major component items that are nearing the end of their life cycle (i.e., furnace, roof, water heater) before they fail and create an emergency hazard, or are not energy efficient (i.e., furnace, windows) and replacement would 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**

In 2017, the City of Jackson was awarded a grant from the Office of Lead Hazard Control and Healthy Homes to remediate lead hazards for low-income residents with children less than 6 years of age living with them. Serving this target population in recent years causes staff to question the validity of the data HUD provided in the pre-populated Table 39 above and offers the following narrative:

The 2015 ACS data used by HUD to prepopulate most tables in this Consolidated Plan estimates 89.8% of the City of Jackson’s housing stock was built before 1980. The 2015 ACS Table S1701 also estimates 36% of City residents live below the federal poverty level; the younger a person is, the more likely they live in poverty as 57% of children under 5 years old and 50.1% of children aged 5 to 17 years old live below the poverty level. Table S0901: Children Characteristics from the 2015 ACS reports there are 3,546 children under 6 years old living within the City limits; if 57% of that age group lives in poverty, over 2,000 children under 6 years old live in a home with lead based paint.

HUD’s 2019 Low and Moderate Income Summary Data (LMISD) table indicates 62% of City of Jackson residents earn 80% of the Area Median Income or less. The number of housing units built before 1979 is approximately 13,283 which equates to approximately 8,235 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 155 housing units registered as of January 31, 2020. Many of these properties are in the mortgage foreclosure process and likely suitable for rehabilitation.

Also as of January 31, 2020, there are 71 condemned privately owned structures, the majority of which are residential properties. In addition, the City currently owns 83 residential properties it acquired through tax reversion. 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 to ensure the properties are brought up to code. Most, however, will be demolished as funds allow. Approximately (75) condemned or City-owned residential properties are in CDBG-eligible areas of the City.

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

**Table 36 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

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

### 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.

## Public Housing Condition

Public Housing Development	Average Inspection Score
Chalet Terrace	80.7
Reed Manor	86.3
Shahan-Blackstone North	78.3

Table 37 - 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 2015, the Executive Director, Laurie Ingram, quickly assimilated herself in the community as she endeavored to change the way public housing is managed in Jackson.

With the three public housing complexes showing their age and obsolescence from declining capital funds from HUD, Ms. Ingram applied for a Rental Assistance Demonstration (RAD) conversion which will change the type of federal housing assistance from public housing (Section 9) to project-based vouchers (Section 8). Recently approved, the RAD conversion allows the JHC to obtain other public or private funding sources to repair and improve their properties. Once the RAD conversion is fully implemented, the JHC will apply for Low-Income Housing Tax Credits (LIHTC) through the State of Michigan. The current goal is to apply for LIHTC by April 2021; if approved, a public/private development to modernize Reed Manor (292 units) and Chalet Terrace (100 units) will be pursued. Shahan-Blackstone North, the newest of the three complexes, will receive upgrades and modernization as needed, but to a lesser extent than Reed Manor and Chalet Terrace.

### **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 RAD conversion 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 cameras and hiring security services from an outside source. During the coming year, the JHC intends to hire, train, and oversee its own security staff.

## 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)	68	10	0	67	0
Households with Only Adults	47	0	0	36	0
Chronically Homeless Households	0	0	0	103	0
Veterans	0	0	0	4	0
Unaccompanied Youth	0	0	0	0	0

Table 38 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

**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.

According to the 2019 PIT Count, one-third of sheltered or unsheltered adults reported having a serious mental illness, 5.1% with a substance abuse disorder, and 21.7% as survivors of domestic violence. 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.

**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.
- *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.

CAA administers Supportive Services for Veteran Families (SSVF) and in 2020 received \$645,055 from the State of Michigan to provide services in Branch, Cass, Hillsdale, Jackson, Lenawee and St. Joseph Counties.

## 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.

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.

The CoC has applied to the State to hire a 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.

## 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 (Percent)	Share of Jobs (Percent)	Jobs less workers (Percent)
Agriculture, Mining, Oil & Gas Extraction	43	0	0	0	0
Arts, Entertainment, Accommodations	1,317	1,351	14	8	-6
Construction	294	190	3	1	-2
Education and Health Care Services	2,253	6,459	23	39	16
Finance, Insurance, and Real Estate	422	877	4	5	1
Information	125	176	1	1	0
Manufacturing	2,082	1,919	22	12	-10
Other Services	466	1,046	5	6	1
Professional, Scientific, Management Services	611	1,524	6	9	3
Public Administration	0	0	0	0	0
Retail Trade	1,372	1,537	14	9	-5
Transportation and Warehousing	261	457	3	3	0
Wholesale Trade	396	893	4	5	1
<b>Total</b>	<b>9,642</b>	<b>16,429</b>	<b>--</b>	<b>--</b>	<b>--</b>

**Table 39 - Business Activity**

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	14,630
Civilian Employed Population 16 years and over	12,360
Unemployment Rate	15.54
Unemployment Rate for Ages 16-24	36.89
Unemployment Rate for Ages 25-65	9.56

**Table 40 - Labor Force**

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	1,705
Farming, fisheries and forestry occupations	620
Service	1,860
Sales and office	3,175
Construction, extraction, maintenance and repair	800
Production, transportation and material moving	905

**Table 41 – Occupations by Sector**

Data Source: 2011-2015 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	9,460	80%
30-59 Minutes	1,950	16%
60 or More Minutes	440	4%
<b>Total</b>	<b>11,850</b>	<b>100%</b>

**Table 42 - Travel Time**

Data Source: 2011-2015 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	1,045	310	1,045
High school graduate (includes equivalency)	3,180	545	2,010
Some college or Associate's degree	3,810	610	1,455
Bachelor's degree or higher	2,025	125	415

**Table 43 - Educational Attainment by Employment Status**

Data Source: 2011-2015 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	35	110	100	190	370
9th to 12th grade, no diploma	655	945	460	595	375
High school graduate, GED, or alternative	1,065	2,030	1,170	2,540	1,255
Some college, no degree	1,405	1,470	1,185	1,755	675
Associate's degree	95	315	335	815	185
Bachelor's degree	55	530	505	845	405
Graduate or professional degree	8	125	160	405	175

**Table 44 - Educational Attainment by Age**

Data Source: 2011-2015 ACS

**Educational Attainment – Median Earnings in the Past 12 Months**

<b>Educational Attainment</b>	<b>Median Earnings in the Past 12 Months</b>
Less than high school graduate	\$14,965
High school graduate (includes equivalency)	\$20,028
Some college or Associate's degree	\$25,280
Bachelor's degree	\$46,083
Graduate or professional degree	\$50,056

**Table 45 – Median Earnings in the Past 12 Months**

Data Source: 2011-2015 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. Of significance though is Jackson has transitioned from a manufacturing to education and health care services base. According to the 2000 Census, 23.7% of jobs were in manufacturing and 20.3% in education and health care services; the 2015 ACS now estimates 23.3% of jobs are in education and health care services while manufacturing has declined to 18.1%. The other leading industries are “retail trade” and “arts, entertainment, and accommodations”.

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, Vinyls, 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 the 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) 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, Michigan Center, 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 the Jackson District Library’s administrative offices;
- Expansion of retail and restaurant options in the downtown.

Coinciding with the growth have been infrastructure improvements, most notably converting the downtown business loop from two (2) one-way streets back to two-lane traffic. Other improvements include the addition of several roundabouts to maintain traffic flow in formerly congested areas. 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 2017-2021 CEDS Plan provides insight into the Region’s Strengths, Weaknesses, Opportunities, and Threats (SWOT):

*The CEDS Steering Committee was able to identify much strength in the Region due to a variety of factors: its strategic location; a multimodal transportation network, other infrastructure, and natural resources; the existing educational system (i.e., primary, secondary, and post-secondary); and a strong workforce and solid economy. Various opportunities that can enhance those strengths were also identified: natural amenities; various initiatives that can be taken advantage of; a variety of potential economic opportunities (i.e., expanded manufacturing, including automotive technologies; diversification in value-added agriculture; enhanced regional health care; and placemaking); as well as evolution in education and infrastructure (i.e., STEAM and LEED). However, in order to increase the economic resiliency of the Region, the Committee also looked at potential weaknesses and threats. Weaknesses and threats identified include: a lack of widespread high-speed broadband access; impediments to workforce training; threats to manufacturing (i.e., an auto-centric focus, jobs lost to technology, and workforce challenges); infrastructure threats (i.e., a largely obsolete industrial building stock, varied municipal governmental capacities and a lack of development-ready land); insufficient funding leading to limited investment (i.e., capital, public transportation, roadway improvements, business support, and housing options); and the need for additional mental health care.*

**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.)

## 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 62% low-income residents based on the 2019 Low-Mod Income Summary Data (LMISD) published by HUD. The percentage of low-income residents exceeds 72% (10 percentage points above the City as a whole) in 12 Block Groups; of those 12 Block Groups, the percentage of low-income residents is as follows:

72 – 80% low-income	4 Block Groups
80 – 85% low-income	3 Block Groups
85 – 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 70.9% White residents and 23.5% Black/African American residents. All other racial groups, including mixed races, make up 5.6% of the total population as does those claiming a Hispanic or Latino heritage. 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. Although they do not meet the concentration definition, Census Tract 13 contains the largest percentage of "other races" in the City at 11.9% while Census Tract 12 contains the largest percentage of Hispanic or Latino persons (10.2%).

### **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.

**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 land line 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 City residents to select from.

## **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. The population is predominantly married couple families (45.1%), followed by female householders (27.5%). According to the Low and Moderate Income Summary Data (LMISD) published by HUD, 81.2% of households are low- to moderate income with 43.5% earning less than 50% AMI. The racial makeup of this Block Group is 70.6% White, 15.1% Black/African American, 7.4% Two or More Races, and 6.9% Some Other Race; those claiming a Hispanic or Latino ethnicity make up 12.1% of the population.

# Strategic Plan

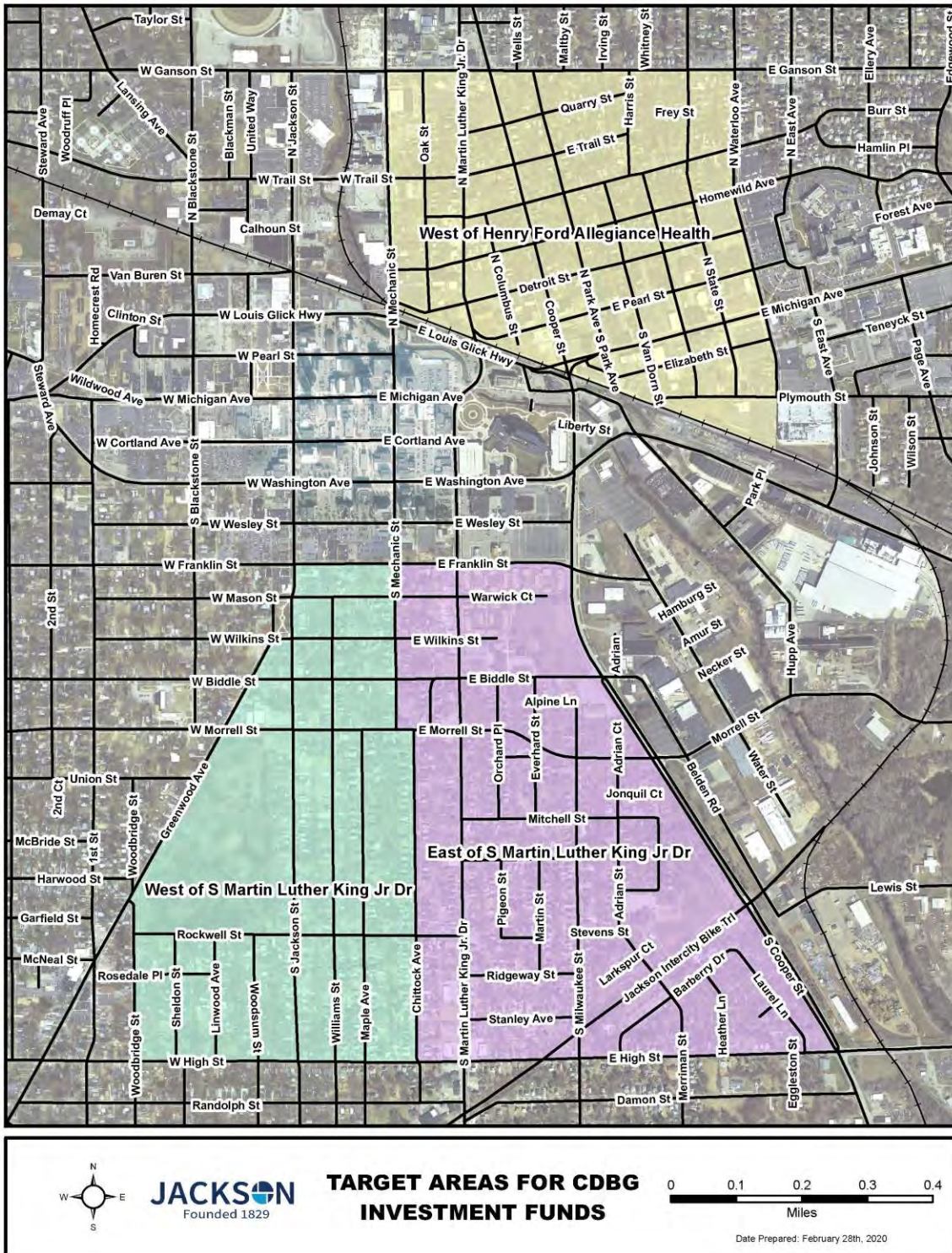
## SP-05 Overview

### Strategic Plan Overview

After several years of focusing CDBG funds towards the revitalization of the downtown, City leaders are now expanding assistance into the adjoining neighborhoods. The initial phase will focus on street reconstruction, clearance of severely dilapidated residential structures, and homeowner rehabilitation. Future projects may include code enforcement support through the City Attorney's office, additional street lighting projects, and other public facilities and infrastructure activities such as small neighborhood parks. The fundamental goal during the next five years is to improve the living conditions for the low- to moderate-income households residing in the three target areas specified in this Consolidated Plan.

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

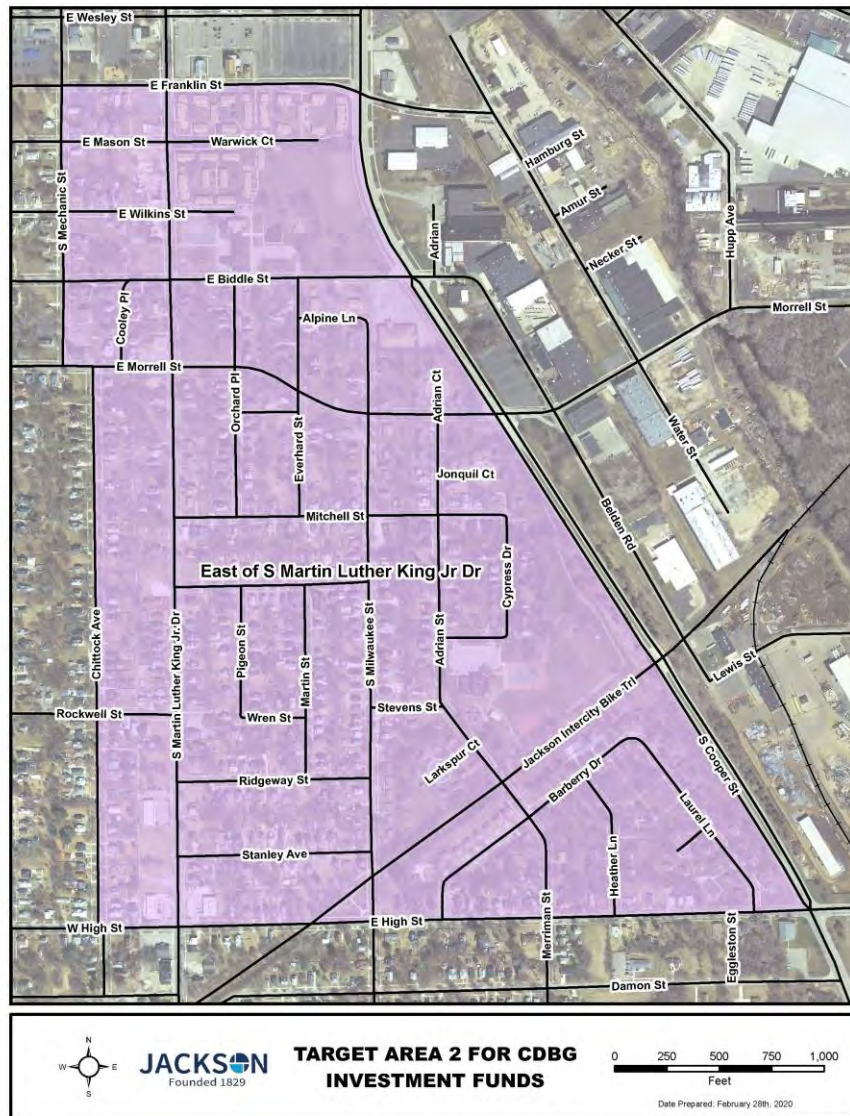
## Geographic Area



<b>1</b>	<b>Area Name:</b>	West of Henry Ford Allegiance Health
	<b>Area Type:</b>	Local Target area
	<b>Revitalization Type:</b>	Comprehensive
	<b>Identify the neighborhood boundaries for this target area.</b>	<ul style="list-style-type: none"> <li>• North – Ganson St</li> <li>• East – Waterloo Ave</li> <li>• South – railroad tracks</li> <li>• West – Mechanic St</li> </ul>
	<b>Include specific housing and commercial characteristics of this target area.</b>	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.
<b>Are there barriers to improvement in this target area?</b>	Lack of private investment	

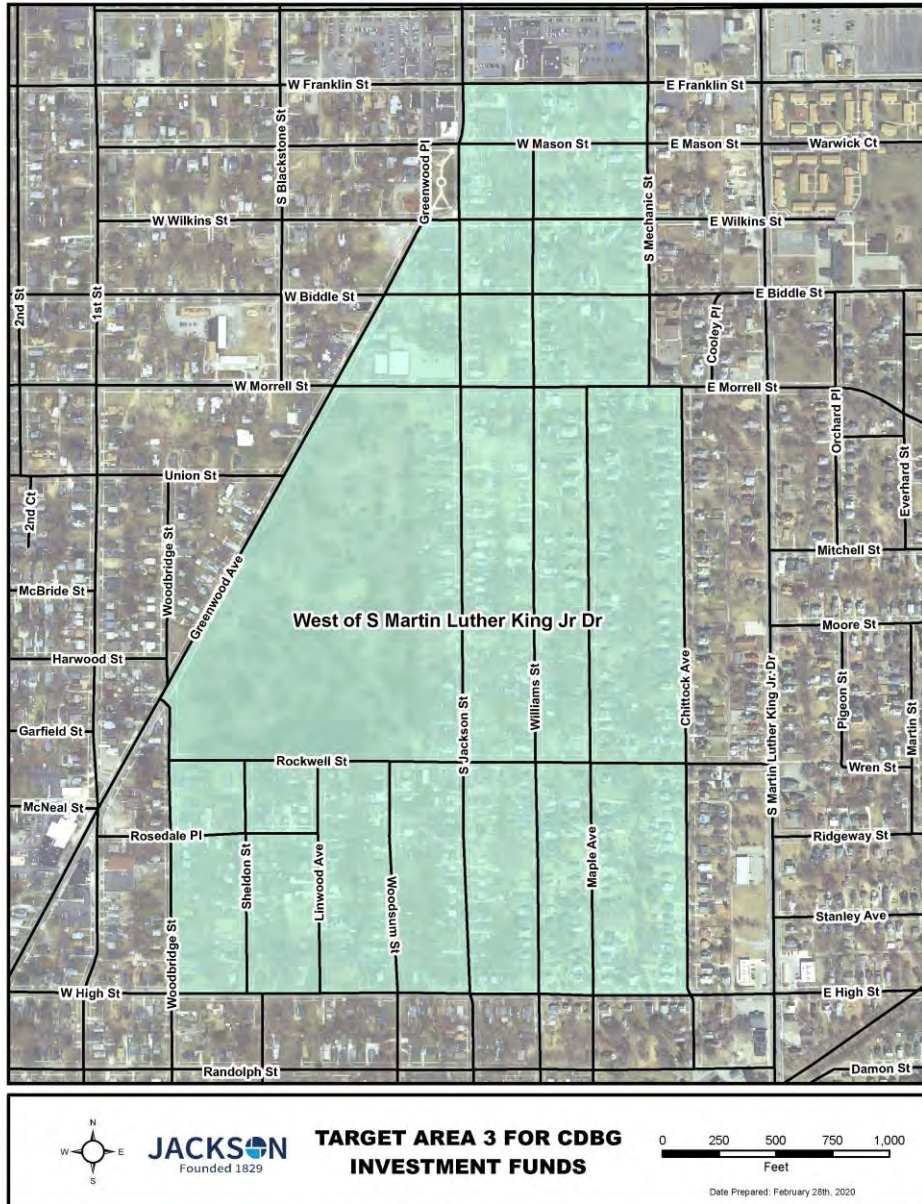


<b>2</b>	<b>Area Name:</b>	East of S Martin Luther King Jr Dr
	<b>Area Type:</b>	Local Target area
	<b>Revitalization Type:</b>	Comprehensive
	<b>Identify the neighborhood boundaries for this target area.</b>	<ul style="list-style-type: none"> <li>• North – Franklin St</li> <li>• East – Cooper St</li> <li>• South – High St</li> <li>• West – Chittock Ave/Mechanic St</li> </ul>
	<b>Include specific housing and commercial characteristics of this target area.</b>	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. No major commercial business is located in the neighborhood.
<b>Are there barriers to improvement in this target area?</b>	Lack of private investment	



<b>3</b>	<b>Area Name:</b>	West of S Martin Luther King Jr Dr
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<b>Area Type:</b>	Local Target area
<b>Revitalization Type:</b>	Comprehensive
<b>Identify the neighborhood boundaries for this target area.</b>	<ul style="list-style-type: none"> <li>• North - Franklin St</li> <li>• East – Mechanic St/Chittock Ave</li> <li>• South – High St</li> <li>• West – Greenwood Ave</li> </ul>
<b>Include specific housing and commercial characteristics of this target area.</b>	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.



### **General Allocation Priorities**

The public reinvestment in the City of Jackson has concentrated on revitalizing the heart of the city – its downtown business district. With revival well on its way, investment in the residential neighborhoods immediately adjacent to the downtown is in order to build on the beautification and blight reduction efforts. The percentage of low- to moderate-income residents in these targeted areas ranges from 60.1% to 87.1%. 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.

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

### Priority Needs

<b>1</b>	<b>Priority Need Name</b>	Homeowner Rehabilitation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly
	<b>Geographic Areas Affected</b>	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr
	<b>Associated Goals</b>	Homeowner Rehabilitation
	<b>Description</b>	Rehabilitation of privately owned, single family homes.
	<b>Basis for Relative Priority</b>	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. City Rehabilitation Staff will review its policies and procedures, last updated in 2014, to determine more effective means of helping low income homeowners remain in their homes. The Emergency Hazard assistance will remain; however, staff has begun discussion to incorporate a new type of assistance to address aging major components before they become emergencies or to improve energy efficiencies in the home.
<b>2</b>	<b>Priority Need Name</b>	Rehabilitation Administration
	<b>Priority Level</b>	High
	<b>Population</b>	Other
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	Costs associated with operating a successful homeowner rehabilitation program, which is listed as Priority 1 above.

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<b>3</b>	<b>Priority Need Name</b>	Public Facilities/Infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly, Persons with Physical Disabilities, Non-housing Community Development
	<b>Geographic Areas Affected</b>	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr
	<b>Associated Goals</b>	Public Facilities/Infrastructure
	<b>Description</b>	Improve the quality of public improvements and infrastructure in low-income neighborhoods.
	<b>Basis for Relative Priority</b>	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. Neighborhood parks in the identified target areas will be assessed for accessibility, usability, and safety and receive enhancements as necessary.

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<b>4</b>	<b>Priority Need Name</b>	Code Enforcement (Legal)
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate, Non-housing Community Development
	<b>Geographic Areas Affected</b>	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr
	<b>Associated Goals</b>	Code Enforcement (legal)
	<b>Description</b>	Legal support to the Department of Neighborhood & Economic Operations to improve low-income neighborhoods and properties.
	<b>Basis for Relative Priority</b>	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.

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<b>5</b>	<b>Priority Need Name</b>	Residential Demolition
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate, Non-housing Community Development
	<b>Geographic Areas Affected</b>	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr
	<b>Associated Goals</b>	Residential Demolition
	<b>Description</b>	Demolition of foreclosed, vacant, or abandoned and dilapidated publicly or privately owned property in low-income neighborhoods.
	<b>Basis for Relative Priority</b>	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.
<b>6</b>	<b>Priority Need Name</b>	New Construction (CHDO)
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly
	<b>Geographic Areas Affected</b>	West of S Martin Luther King Jr Dr
	<b>Associated Goals</b>	New Construction - CHDO
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	Continued support to Jackson's CHDO with their efforts to build rowhouse/townhouse type infill housing for sale to low-income households upon completion.
<b>7</b>	<b>Priority Need Name</b>	CHDO Operating Expenses
	<b>Priority Level</b>	High
	<b>Description</b>	Operating expenses related to CHDO activities; limited to no more than five (5%) percent of the City's annual HOME allocation.
	<b>Basis for Relative Priority</b>	Financial support to defray administrative costs incurred by the CHDO.
<b>8</b>	<b>Priority Need Name</b>	Administration/Planning
	<b>Priority Level</b>	High
	<b>Description</b>	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.

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<b>9</b>	<b>Priority Need Name</b>	Public Service Activity
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low, Low, Moderate
	<b>Geographic Areas Affected</b>	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr
	<b>Associated Goals</b>	Public Service Activity
	<b>Description</b>	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.

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**Table 46 – 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, it is anticipated the City will share a majority of its annual HOME funds with its CHDO, the Greater Jackson Habitat for Humanity, to increase the number of new, affordable homebuyer options.</p> <p>The use of CDBG funds for the conversion of vacant upper floors of downtown commercial properties into affordable rental units will be subject to fluctuations in annual funding. Funds may or may not be allocated toward conversion activities accordingly.</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 re-envision its rehabilitation options made available to the low-income community to ensure it preserves as much of the predominately single-family homes as possible while improving energy efficiency, thereby making more hard earned income available to low-income persons.</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 47 – 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 \$1,165,069 with a minimum of \$1,116,874 and maximum of \$1,227,886; the difference between minimum and maximum is \$111,012. HOME funds received average \$281,431 during the past five (5) years with a minimum of \$240,571 and maximum of \$357,874; the difference between minimum and maximum is \$114,303.

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 2020–2021 is as follows:

- **CDBG:** 2019-20 formula allocation: \$1,227,886; less 3% (-\$38,600); plus estimated program income (\$75,200) = \$1,266,266
- **HOME:** 2019-20 formula allocation: \$336,299; less 3% (-\$10,100); plus estimated program income (\$20,200) = \$346,399

HUD published the nation's 2020-2021 formula allocations in time to accurately reflect first year project funding in the Annual Action Plan without having to rely on estimates.

### 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	\$1,285,122	\$75,200	-0-	\$1,360,322	\$4,660,300	Annual block grant from HUD to address community development and housing needs.
HOME	Federal	Homebuyer Assistance, Homeowner Rehab, New Construction For Ownership	\$317,100	\$20,200	-0-	\$337,300	\$1,125,725	Annual grant from HUD to address affordable housing

Table 48 - 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. HUD’s criterion for fiscal distress determination is as follows:

1. Fiscal Year 2019 individual poverty rate and per capita income (PCI) were based on data obtained from the American Community Survey 2012-2016 Five-Year Estimates from the Census.
2. For the City to qualify as distressed based on the **poverty criterion**, the percentage of persons in poverty must have been no less than 19.303%, which is 125% of the national poverty rate of 15.44%. The poverty rate for all persons in the City of Jackson was **36.3%** (*Source: 2012-2016 5-Year ACS Table S1701*)
3. To qualify as distressed based on the **PCI criterion**, the City’s average PCI must have been less than \$22,222 which is 75% of the national average PCI of \$29,629. Jackson’s average PCI was **\$16,183** (*Source: 2012-2016 5-Year ACS Table DP03*).

**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. One such area is at the corner of Franklin and Mechanic Streets where vacant parcels owned by the City of Jackson and CAA provide the impetus for an affordable housing collaboration. With the Greater Jackson Habitat for Humanity acting as the City’s Community Housing Development Organization (CHDO) for HOME funds and developer in partnership with CAA which receives YouthBuild funding through the U.S. Department of Labor, a cohesive affordable housing project is underway. The project location is immediately south of the downtown which has experienced growth and revitalization and will neighbor a new \$23 million Y Center planned to begin construction in 2021.

## 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 Entity Type	Role	Geographic Area Served
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 49 - 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). Required by the HOME program, no less than 15% of Jackson's annual grant funds must be set aside for CHDO-eligible projects. After the City's long-time CHDO, Jackson Affordable Housing Corporation, closed its doors in 2013, CAA stepped up to serve as CHDO. After CAA declined to serve as CHDO a few years later, the City had difficulty finding an organization that qualified.

Talks with Habitat began after its current Executive Director was hired in October 2017. 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.

### 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
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training			
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X		
Other			
	X		

Table 50 - 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	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeowner Rehabilitation	2020	2024	Affordable Housing	Homeowner Rehabilitation	CDBG HOME	Homeowner Rehabilitation: 75 homeowner units rehabilitated
2	Public Facilities/Infrastructure	2020	2024	Non-Housing Community Development	Public Facilities/ Infrastructure	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3180 Persons Assisted
3	Code Enforcement (legal)	2020	2024	Non-Housing Community Development	Code Enforcement (Legal)	CDBG	Housing Code Enforcement: 500 Household Housing Unit
4	Residential Demolition	2020	2024	Clearance and Demolition	Residential Demolition	CDBG	Buildings Demolished: 100 Buildings
5	New Construction - CHDO	2020	2024	Affordable Housing	New Construction (CHDO)	HOME	Homeowner Housing Added: 5 Household Housing Units
6	Public Service Activity	2020	2024	Non-Housing Community Development	Public Service Activity	CDBG	Number of low-income persons served

Table 51 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Homeowner Rehabilitation
	<b>Goal Description</b>	<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 re-envision its rehabilitation options made available to the low-income community to ensure it preserves as much of the predominately single-family homes as possible while improving energy efficiency, thereby making more hard earned income available to low-income persons.</p>

<b>2</b>	<b>Goal Name</b>	Public Facilities/Infrastructure
	<b>Goal Description</b>	Like all communities in Michigan, public infrastructure is difficult to maintain due to 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. Neighborhood parks in the identified target areas will be assessed for accessibility, usability, and safety and receive enhancements as necessary.
<b>3</b>	<b>Goal Name</b>	Code Enforcement (legal)
	<b>Goal Description</b>	Legal support to the Department of Neighborhood & Economic Operations to improve low-income neighborhoods and properties.
<b>4</b>	<b>Goal Name</b>	Residential Demolition
	<b>Goal Description</b>	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.
<b>5</b>	<b>Goal Name</b>	New Construction - CHDO
	<b>Goal Description</b>	Continued support to the Jackson's CHDO with their efforts to build new rowhouse/townhouse type infill housing for sale to low-income households upon completion.
<b>6</b>	<b>Goal Name</b>	Public Service Activity
	<b>Goal Description</b>	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 the City's CHDO will create five (5) new homebuyer units for qualified low-income families. Through 20-year no interest, low repayment, 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 4,400 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; all locations make reasonable accommodations to any tenant presenting with a disability in an effort to improve accessibility.

### **Activities to Increase Resident Involvements**

Active Resident Advisory Boards are in place at both Reed Manor and Chalet Terrace. Several attempts have been made to initiate a Resident Advisory Board at Shahan-Blackstone North but efforts have thus far fallen short. The most recent attempt was less than six (6) months ago - an election took place and first meeting held; however, it disbanded after the first meeting. A new housing manager is in place dedicated to just Shahan (the previous housing manager had to split time with Chalet Terrace) and another attempt to organize a resident board at Shahan will occur within the next six (6) months. Residents are encouraged to attend Board meetings, talk with their housing managers, and even the Executive Director if warranted. 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 opportunity 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?**

No

### **Plan to remove the ‘troubled’ designation**

Not applicable

## **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 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.

The CoC has applied to the State to hire a 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.

### **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.

## **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.

### **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 \$75,000 is available through a 20-year, zero-interest, deferred loan with a partial low repayment component (10 years) to correct code violations or emergency hazards.
- *Homebuyer New Construction* – currently under development through the City’s CHDO, the Greater Jackson Habitat for Humanity.

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 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 subrecipients 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.



## Annual Action Plan

### 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 \$1,165,069 with a minimum of \$1,116,874 and maximum of \$1,227,886; the difference between minimum and maximum is \$111,012. HOME funds received average \$281,431 during the past five (5) years with a minimum of \$240,571 and maximum of \$357,874; the difference between minimum and maximum is \$114,303.

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 2020–2021 is as follows:

- **CDBG:** 2019-20 formula allocation: \$1,227,886; less 3% (-\$38,600); plus estimated program income (\$75,200) = \$1,266,266
- **HOME:** 2019-20 formula allocation: \$301,299; less 3% (-\$9,000); plus estimated program income (\$20,200) = \$312,499

HUD published the nation’s 2020-2021 formula allocations in time for this Annual Action Plan to reflect actual versus estimated amounts.

#### 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	\$1,285,122	\$75,200	-0-	\$1,360,322	\$4,660,300	Annual block grant from HUD to address community development and housing needs.
HOME	Federal	Homebuyer Assistance, Homeowner Rehab, New Construction For Ownership	\$317,100	\$20,200	-0-	\$337,300	\$1,125,725	Annual grant from HUD to address affordable housing

**Table 52 - 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 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. HUD’s criterion for fiscal distress determination is as follows:

1. Fiscal Year 2019 individual poverty rate and per capita income (PCI) were based on data obtained from the American Community Survey 2012-2016 Five-Year Estimates from the Census.
2. For the City to qualify as distressed based on the **poverty criterion**, the percentage of persons in poverty must have been no less than 19.303%, which is 125% of the national poverty rate of 15.44%. The poverty rate for all persons in the City of Jackson was **36.3%** (*Source: 2012-2016 5-Year ACS Table S1701*)
3. To qualify as distressed based on the **PCI criterion**, the City’s average PCI must have been less than \$22,222 which is 75% of the national average PCI of \$29,629. Jackson’s average PCI was **\$16,183** (*Source: 2012-2016 5-Year ACS Table DP03*).

**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. One such area is at the corner of Franklin and Mechanic Streets where vacant parcels owned by the City of Jackson and leading local non-profit Community Action Agency (CAA) provide the impetus for an affordable housing collaboration. With the Greater Jackson Habitat for Humanity acting as the City’s Community Housing Development Organization (CHDO) for HOME funds and developer in partnership with CAA which receives YouthBuild funding through the U.S. Department of Labor, a cohesive affordable housing project is underway. The project location is immediately south of the downtown which has experienced growth and revitalization and will neighbor a new \$23 million Y Center planned to begin construction in 2021.

## AP-20 Annual Goals and Objectives

### Goals Summary Information

Goal Name	Category	Needs Addressed	Funding	Goal Outcome Indicator
1 Homeowner Rehabilitation	Affordable Housing	Homeowner Rehabilitation	\$424,056 CDBG	Homeowner Rehabilitation: 15 homeowner units rehabilitated
2 Public Facilities/Infrastructure	Non-Housing Community Development	Public Facilities/Infrastructure	\$541,266 CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3180 Persons Assisted
3 Residential Demolition	Clearance and Demolition	Residential Demolition	\$300,000 CDBG	Buildings Demolished: 20 Buildings
5 New Construction - CHDO	Affordable Housing	New Construction (CHDO)	HOME	Homeowner Housing Added: 3 Household Housing Units

Table 53 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b> <b>Goal Description</b>	Homeowner Rehabilitation Initially, rehabilitation loans will be provided to correct emergency hazards such as leaking roofs, non-working furnaces, etc. Another section of the rehabilitation program will be developed to provide similar loans to low-income homeowners addressing aged or non-energy efficient major components.
2	<b>Goal Name</b> <b>Goal Description</b>	Public Facilities/Infrastructure Street reconstruction will occur on Steward Avenue between the railroad crossing and Ganson Street, Third Street between Washington and Michigan Avenues, and Washington Avenue between First and Fourth Streets. During non-construction months, pre-construction design work will begin in the three target areas: West of Henry Ford Allegiance Health, East of South Martin Luther King Jr. Drive, and West of South Martin Luther King Jr. Drive.
3	<b>Goal Name</b> <b>Goal Description</b>	Residential Demolition Demolition of foreclosed, vacant, abandoned, or condemned residential structures.
4	<b>Goal Name</b> <b>Goal Description</b>	New Construction - CHDO New construction of affordable homebuyer units at the corner of Franklin and Mechanic Streets by the City's CHDO, Greater Jackson Habitat for Humanity.

## AP-35 Projects – 91.220(d)

### Introduction

The City of Jackson is funding projects to achieve the goals and objectives during this first year of the 2020-2024 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 are now expanding assistance into the adjoining neighborhoods. The initial phase will focus on street reconstruction, clearance of severely dilapidated residential structures, and homeowner 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	Homeowner Rehabilitation
2	Street Reconstruction
3	Residential Demolition
4	New Construction - CHDO
5	CHDO Operating Expenses
6	Administration/Planning

Table 54 – Project Information

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

The level of CDBG funds Jackson receives is relatively low considering increasing costs to implement improvements and is insufficient to meet the demands for assistance. Historically, attempting to fund as many projects as possible did little to impact the community 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 community development needs it is responsible for, such as infrastructure improvements, park improvements, street lighting, etc. Reliance on non-profit and faith-based organizations to meet this need through other available funds allows the City to focus on improving low-income neighborhoods which subsequently impacts the entire City.

# AP-38 Project Summary

## Project Summary Information

<b>1</b>	<b>Project Name</b>	Homeowner Rehabilitation
	<b>Target Area</b>	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr
	<b>Goals Supported</b>	Homeowner Rehabilitation
	<b>Needs Addressed</b>	Homeowner Rehabilitation
	<b>Funding</b>	CDBG: \$424,056
	<b>Description</b>	Provision of 20 year deferred, no interest loans with a nominal 10-year repayment component to correct emergency hazard or major component deficiencies.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit</b>	Fifteen (15) low-income homeowners will have emergency hazard or major component issues corrected.
	<b>Location Description</b>	Specific sites will be determined in the future through an application and eligibility qualification review.
	<b>Planned Activities</b>	Provision of 20 year deferred, no interest loans with a nominal repayment component to low income homeowners to correct emergency hazards or major components that are near the end of their expected life or non-energy efficient.
<b>2</b>	<b>Project Name</b>	Street Reconstruction
	<b>Target Area</b>	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr
	<b>Goals Supported</b>	Public Facilities/Infrastructure
	<b>Needs Addressed</b>	Public Facilities/Infrastructure
	<b>Funding</b>	CDBG: \$541,266
	<b>Description</b>	Street reconstruction activity on Steward Ave from the railroad crossing to Ganson St, on Third St from Washington to Michigan Aves, and Washing Ave from First to Fourth Sts. During winter months, pre-construction design work will begin in the three target areas, West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, and West of S Martin Luther King Jr Dr.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number of families that will benefit</b>	Approximately 3,180 low-income families as a low/mod area benefit.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• Steward Ave: railroad crossing to Ganson St (Census Tract 2, Block Groups 2 and 3)</li> <li>• Third St: Washington to Michigan Ave (Census Tract 9, Block Group 1)</li> <li>• Washington Ave: First to Fourth St (Census Tract 9, Block Group 1)</li> </ul> Pre-construction design work in the three local target areas identified below.
	<b>Planned Activities</b>	Street reconstruction activity on Steward Ave from the railroad crossing to Ganson St, on Third St from Washington to Michigan Aves, and Washing Ave from First to Fourth St. During winter months, pre-construction design work will begin in the three target areas, West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, and West of S Martin Luther King Jr Dr.

<b>3</b>	<b>Project Name</b>	Residential Demolition
	<b>Target Area</b>	West of Henry Ford Allegiance Health, East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr
	<b>Goals Supported</b>	Residential Demolition
	<b>Needs Addressed</b>	Residential Demolition
	<b>Funding</b>	CDBG: \$300,000
	<b>Description</b>	Demolition of foreclosed, vacant, abandoned, or condemned residential houses in CDBG-eligible areas of the City.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit</b>	Low-income, primarily residential areas within the City of Jackson.
	<b>Location Description</b>	Specific sites will be determined in the future, subject to SHPO approval and 30% cap on Slum/Blight Spot Basis activities.
	<b>Planned Activities</b>	Demolition of 20 foreclosed, vacant, abandoned, or condemned residential houses 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 activity.
<b>4</b>	<b>Project Name</b>	New Construction - CHDO
	<b>Target Area</b>	West of S Martin Luther King Jr Dr
	<b>Goals Supported</b>	New Construction - CHDO
	<b>Needs Addressed</b>	New Construction (CHDO)
	<b>Funding</b>	HOME: \$287,500
	<b>Description</b>	Additional funds provided to create three (3) new affordable homebuyer units at the corner of Franklin and Mechanic Streets.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit</b>	Three (3) low-income homebuyers will purchase affordable new housing units from the Greater Jackson Habitat for Humanity.
	<b>Location Description</b>	Project is still in development stage so no specific addresses have been assigned to the future units. Units will be constructed on Franklin Street at the corner of Mechanic Street.
	<b>Planned Activities</b>	Development of three (3) new affordable homebuyer units for resale to qualifying low-income household.
<b>5</b>	<b>Project Name</b>	CHDO Operating Expenses
	<b>Needs Addressed</b>	CHDO Operating Expenses
	<b>Funding</b>	HOME: \$16,800
	<b>Description</b>	Operating expenses related to CHDO activities; limited to no more than five (5%) percent of the City's annual HOME allocation.
	<b>Target Date</b>	6/30/2021
	<b>Planned Activities</b>	Operating expenses related to CHDO activities; limited to no more than five (5%) percent of the City's annual HOME allocation.

<b>6</b>	<b>Project Name</b>	Administration/Planning
	<b>Needs Addressed</b>	Administration/Planning
	<b>Funding</b>	CDBG: \$50,000 HOME: \$33,000
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2021
<b>7</b>	<b>Project Name</b>	Rehabilitation Administration
	<b>Needs Addressed</b>	Rehabilitation Administration
	<b>Funding</b>	CDBG: \$45,000
	<b>Description</b>	All delivery costs directly related to carrying out housing rehabilitation activities, including staff, other direct costs, and service costs.
	<b>Target Date</b>	6/30/21

## 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 public reinvestment in the City of Jackson has concentrated on revitalizing the heart of the city – its downtown business district. With revival well on its way, investment in the residential neighborhoods immediately adjacent to the downtown is in order to build on the beautification and blight reduction efforts. The percentage of low- to moderate-income residents in these targeted areas ranges from 60.1% to 87.1%. 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.

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.

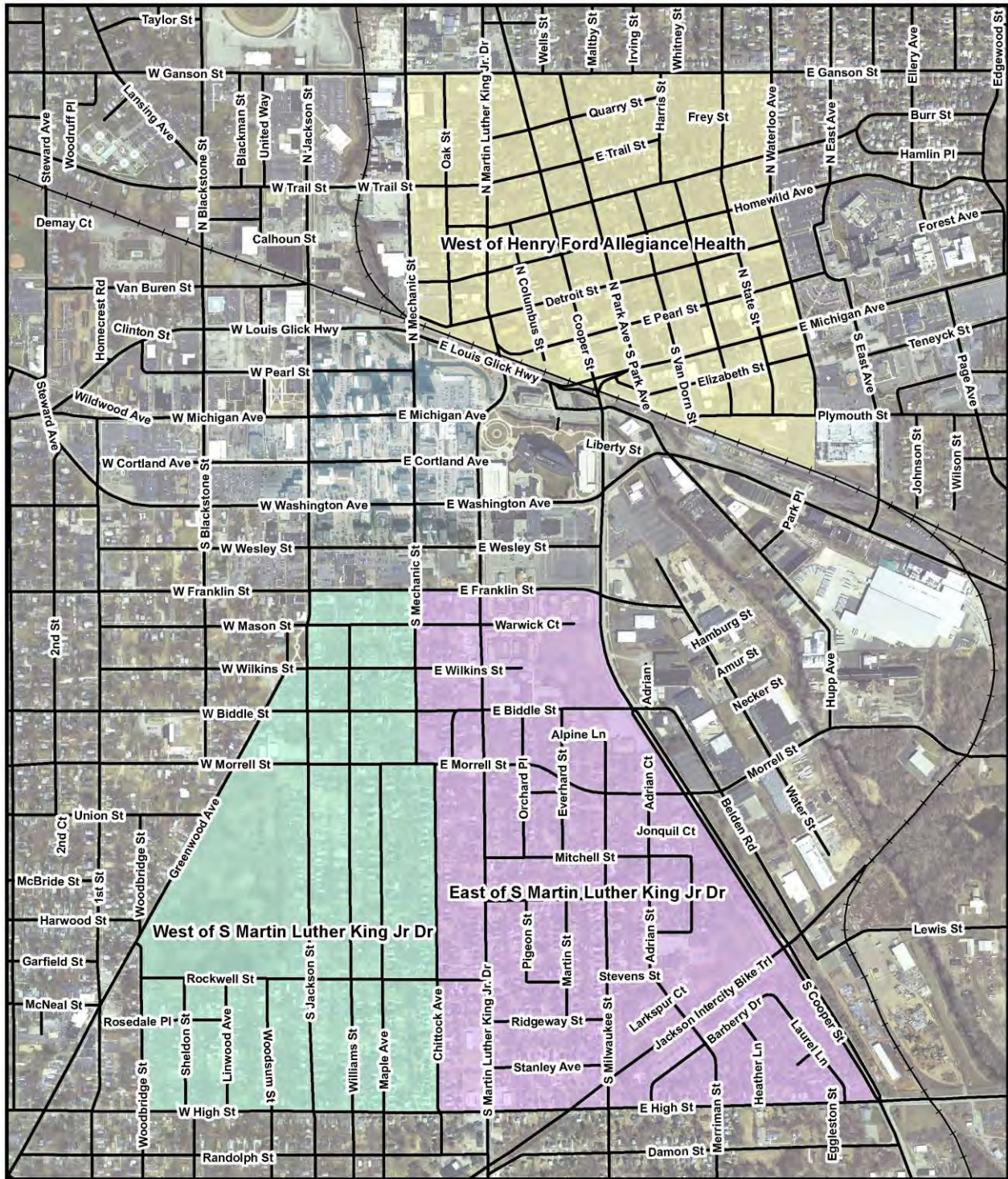
### Geographic Distribution

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 55 - Geographic Distribution

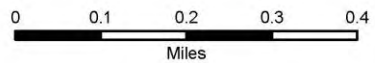
### Rationale for the priorities for allocating investments geographically

Being this is the first year to start work in the identified local target areas, and having prior year projects to complete before turning the City's full focus in these areas, it is estimated perhaps approximately 15% of CDBG funds will be expended in each area. As the City moves into subsequent years of the Five-Year Consolidated Plan and staff has devoted time to complete an assessment of each area's specific needs, it is anticipated additional, meaningful projects will be funded to provide a noticeable, positive impact in the neighborhoods.



**JACKSON**  
Founded 1829

**TARGET AREAS FOR CDBG  
INVESTMENT FUNDS**



Date Prepared: February 28th, 2020

## AP-55 Affordable Housing – 91.220(g)

### Introduction

The need for affordable housing cannot be denied when the majority of a community (62%) earns less than 80% of the area median income, or when approximately one-third of the population lives below the federal poverty level. City leaders recognize this need but are also cognizant of many other non-housing community development needs it is responsible for, such as infrastructure improvements, park improvements, street lighting, etc. The level of CDBG funds Jackson receives is relatively low considering increasing costs to implement improvements and is insufficient to meet the demands for assistance. Historically, attempting to fund as many projects as possible did little to impact the community as a whole; therefore, the number of projects have decreased to ensure sufficient funding to complete activities which boost the community as a whole.

Homeowner rehabilitation is one activity that can be life changing for one household while enhancing the neighborhood in which it is located. Since the inception of the City's rehabilitation program, projects either corrected all code violations in a home (full rehab) or addressed emergency hazards such as a leaking roof or a furnace that stopped working in the middle of winter. Due to the age of the City's housing stock and years of deferred maintenance, full rehabs have become so cost prohibitive very few households received assistance. City rehabilitation staff is changing the way it does business so more low-income families can be assisted, thereby staying in their home. Emergency hazards will continue to be addressed as needed; however, it is the City's goal to attend to the aged major components of a home before they actually become an emergency. By helping low-income homeowners fix the most costly systems to keep a home safe, dry, and sanitary, or to improve the energy efficiencies, households will have more hard earned income at their disposal to tackle smaller, less expensive maintenance projects.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	16
Special-Needs	0
<b>Total</b>	<b>16</b>

Table 56 - 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	15
Acquisition of Existing Units	0
<b>Total</b>	<b>16</b>

Table 57 - One Year Goals for Affordable Housing by Support Type

## **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**

Efforts to improve the relationship between the City of Jackson and the JHC has been on-going; recent administration changes within the City will renew and reinvigorate those efforts. The City will work collaboratively with the JHC as needed through the Rental Assistance Demonstration (RAD) conversion, which changes the type of federal housing assistance from public housing (Section 9) to project-based vouchers (Section 8). Recently approved, the RAD conversion allows the JHC to obtain other public or private funding sources to repair and improve their properties. Once the RAD conversion is fully implemented, the JHC will apply for Low-Income Housing Tax Credits (LIHTC) through the State of Michigan.

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

Active Resident Advisory Boards are in place at both Reed Manor and Chalet Terrace. Several attempts have been made to initiate a Resident Advisory Board at Shahan-Blackstone North but efforts have thus far fallen short. The most recent attempt was less than six (6) months ago - an election took place and first meeting held; however, it disbanded after the first meeting. A new housing manager is in place dedicated to just Shahan (the previous housing manager had to split time with Chalet Terrace) and another attempt to organize a resident board at Shahan will occur within the next six (6) months. Residents are encouraged to attend Board meetings, talk with their housing managers, and even the Executive Director if warranted. 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 opportunity 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 Jackson Housing Commission is not a troubled agency.

## **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 2018 HMIS data to capture a full year of information, and the 2019 PIT Count conducted on January 30, 2019.

### **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.

#### **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.

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

### Introduction:

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:

- 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 spoiled 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.

### **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 participate with the CoC in developing 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.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The activities and goals of the 2020-2021 Annual Action Plan coincide with the priorities identified in the 2020-2024 Five-Year Consolidated Plan. Some activities funded during this first year of the Consolidated Plan close out 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 to include new programs designed to address the most costly systems in housing maintenance before they become emergency situations.

### **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 begin development of affordable housing units for resale to qualifying low-income households.

### **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 its low- to moderate-income homeowners:

- *Rehabilitation* – up to \$75,000 is available through a 20-year, zero-interest, deferred loan with a partial low repayment component (10 years) to correct code violations or emergency hazards.
- *Homebuyer New Construction* – currently under development through the City's CHDO, the Greater Jackson Habitat for Humanity.

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 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(l)(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(l)(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
<b>Total Program Income:</b>	<b>0</b>

#### 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%

Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

## **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 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 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 any 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.