



Analysis of Impediments to Fair Housing Choice

Macomb County and
The City of Roseville, Michigan

Final Report – January 2013

Prepared by ASK Development Solutions, Inc.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

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I. INTRODUCTION

Analysis of Impediments Background

The Analysis of Impediments to Fair Housing Choice (AI) is a U.S. Department of Housing and Urban Development (HUD) mandated review of impediments to fair housing choice in the public and private sector. The AI is required for the Macomb County and the City of Roseville, as all HUD grant entitlement jurisdictions, by federal regulatory requirements at 24 CFR 91.255(a)(1); 91.325(a)(1); and 91.425(a)(1)(I).

The AI involves:

- A review of the region's demographic, economic, and housing characteristics.
- A review of a region's laws, regulations, and administrative policies, procedures and practices;
- An assessment of how those laws, policies and practices affect the location availability and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes;

According to HUD, impediments to fair housing choice are:

1. Any actions, omissions, or decisions *taken because of* race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
2. Any actions, omissions or decisions *that have the effect of* restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

Although the AI itself is not directly approved or denied by HUD, its submission is a required component of the County's Consolidated Plan. HUD states that the purposes of the AI are to:

- serve as the substantive, logical basis for the Fair Housing Plan;
- provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- assist in building public support for fair housing efforts both within an entitlement jurisdiction's boundaries and beyond.

To most accurately evaluate current fair housing conditions within Macomb County and the City of Roseville, the AI includes a review of demographic and housing market data, pertinent legislation, regulations affecting fair housing, public education and outreach efforts, and a community fair housing survey. The AI allows the County to identify any existing impediments or barriers to fair housing choice and to develop an action plan containing strategies to mitigate such barriers.

Fair Housing Act

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability. The Fair Housing Act covers most types of housing including rental housing, home

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sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons. The State of Michigan has a fair housing law (Michigan Fair Housing Act of 1968) similar to the Federal Fair Housing Act.

Who Conducted the AI

The Macomb County/City of Roseville's 2012 Analysis of Impediments to Fair Housing Choice was conducted by ASK Development Solutions, Inc. (ASK), a consulting firm working on behalf of Macomb County/City of Roseville.

Participants in the AI

Macomb County and the City of Roseville AI included input from many county and city officials, citizens, and key persons involved in housing and community development industry, and in particular, fair housing. The consultant developed fair housing surveys for citizens, housing service providers, Realtors, and lending institutions. A flyer was created that included information regarding the survey and the internet address for survey completion. Copies of the flyers were posted in the libraries, on the City of Roseville's website, on the City of Roseville's notice board in City Hall, and at the County's notice board in the Housing and Community Development office. Copies of the flyer were emailed to the cities within Macomb County by email blast.

Surveys were utilized to gather information from housing consumers and from various sectors of the housing industry about their experiences and perceptions of housing discrimination and their opinions on the fair housing laws and services. ASK staff conducted interviews with key individuals from County and City staff, non-profits, the U.S. Department of Housing and Urban Development (HUD), and housing providers to collect additional information about fair housing practices and impediments in the City. Additionally, public meetings were conducted to solicit input on fair housing discrimination and impediments to fair housing from the various industry representatives and service providers, and the public stakeholders at large. The two public meetings were promoted through an email blast to the cities within Macomb County, as well as on the Roseville and Macomb County's websites. Additional information was gathered via meeting, teleconference and email correspondence with the State of Michigan Department of Civil Rights, the Fair Housing Center of Metropolitan Detroit, and nonprofit and advocacy groups. Staff of Macomb County and the City of Roseville actively participated in development of the AI.

Planning and Research Methodology

The consultant's methodology in undertaking the 2012 Macomb County/City of Roseville AI was based on the recommended methodology in the *Fair Housing Planning Guide Vol. 1* (HUD Office of Fair Housing and Equal Opportunity); experience conducting AIs for other cities, and the desires of the County and City. The scope of work consisted of the following tasks:

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Task 1 - Project Launch

Consultant met with the project managers from the county and city to refine work tasks and the project schedule, establish reporting relationships and review expectations of the project. Consultant collected relevant data, identified potential candidates for key person interviews, and discussed the public participation components of the study. Consultant then began creation of the survey instruments.

Task 2 - Community Data Review

Consultant reviewed existing demographic, economic, employment and housing market information for Macomb County using the 2010 U.S. Census, the Census American Community Survey; lending data from the Home Mortgage Disclosure Act (HMDA); foreclosure data from RealtyTrac; data and maps from Macomb County's Five Year Consolidated Plan; data from the previous Consolidated Annual Performance and Evaluation Reports (CAPER); and data and maps from documents available via the County and City websites. In addition, the consultant conducted public meetings and teleconferences.

Task 3 - Regulatory Review

Consultant researched and collected information regarding Macomb County's current development regulations, planning and zoning fees, housing policies and programs that influence fair housing choice and impediments, through a review of the County/City policies and interviews with key County/City staff. ASK staff corresponded via email and/or teleconference with the State of Michigan Department of Civil Rights, as well as fair housing service providers and agencies, to further investigate fair housing policies and potential impediments.

Task 4 - Compliance Data Review

The consultant collected and analyzed all applicable available data regarding compliance with local, state and federal Fair Housing Law, including the Home Mortgage Disclosure Act (HMDA), the Fair Housing Act and the Community Reinvestment Act (CRA). ASK also analyzed reported fair housing complaints from the State of Michigan Department of Civil Rights, the Fair Housing Center of Metropolitan Detroit, and the U.S. Department of Housing and Urban Development (HUD). Complaint data and the process of disposition of any cases were reviewed for evidence of fair housing practices and impediments.

Task 5 - Internet Surveys, Direct Surveys, and Personal Interviews

Beginning May 2012, the consultant conducted an online survey available to all Macomb County residents and industry stakeholders. The survey asked respondents about their experience and perception of housing discrimination, their knowledge of fair housing laws, their utilization of housing assistance and social service programs, and their opinions about housing and social service needs in the county. In addition to the online survey for housing consumers, surveys were created to elicit input and fair housing data from housing providers, realtors and lenders. Surveys were also directly administered and public meetings conducted by both County/City staff and the consultant to secure input. As well as the online surveys, County/City staff administered the survey instrument at several meetings. During this phase of the analysis, the consultant conducted key person interviews.

Task 6 - Identification and Analysis of Impediments

The consultant then analyzed the findings from the first five tasks in order to determine what impediments to fair housing choice exist in Macomb County and the City of Roseville. The consultant also reviewed identified impediments from the 2005 Macomb County Analysis of

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Impediments report, determined what actions had been taken by the City to address those impediments and the existing status of those impediments.

Task 7 - Recommendations

In consultation with County and City staff, the consultant developed a recommended Action Plan for addressing the identified impediments.

Summary of Actions Still Required to Resolve Previous Impediments

The Macomb County and City of Roseville AIs outlined actions for addressing the impediments that were identified then. Although some actions were initiated, additional steps are needed to fully address the previous impediments. Recommended actions may not have been implemented due to a variety of factors including vagueness of actions, inadequate human and financial resources and the County's difficulty in enforcing fair housing requirements with its member communities. The status of actions to remove impediments identified in 2005 was reviewed and the following updated recommendations were provided, many of which may be addressed by the actions outlined in the current AI and Action Plan.

Macomb County

- **Updated Recommendation: Previous Impediment #1**

It is recommended that the County prepare additional informational brochures in different languages or include Fair Housing information including whom to contact to file a fair housing complaint to be posted in their website. In order to meet the needs of non-English speaking populations, the website should have a translation function.

- **Updated Recommendation: Previous Impediment #2**

It is recommended that the County undertake Fair Housing Education to include lending institutions, realtors, and the general public; and to continue to use its resources to provide housing opportunities to minority residents and disabled persons.

- **Updated Recommendation: Previous Impediment #3**

It is recommended that the County allocates additional funding to undertake and expand fair housing services, including testing subject to availability of funding.

- **Updated Recommendation: Previous Impediment #4**

The county should continue to educate its participating municipalities and HOME Consortium in Fair Housing and ADA requirements.

- **Updated Recommendation: Previous Impediment #5**

It is recommended that the County expand overall fair housing activities.

City of Roseville

- **Updated Recommendation: Previous Impediment #1**

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It is recommended that the City undertake Fair Housing Education to include lending institutions, realtors, and the general public; and to continue to work closely with local, state, and federal agencies to promote awareness of fair housing issues.

- **Updated Recommendation: Previous Impediment #2**

It is recommended that the City continues to direct resources to create affordable housing programs.

- **Updated Recommendation: Previous Impediment #3**

Same as previous recommendation #2.

- **Updated Recommendation: Previous Impediment #4**

Same as previous recommendation #2.

- **Updated Recommendation: Previous Impediment #5**

Same as previous recommendation #2.

- **Updated Recommendation: Previous Impediment #6**

The City of Roseville's Housing Commission should track Section 8 voucher holders by race and census tract of residential location.

- **Updated Recommendation: Previous Impediment #7**

It is recommended that the City undertake Fair Housing Education to include lending institutions, realtors, and the general public; and to utilize its position as a resource network to disseminate Fair Housing and ADA information to the aforementioned groups, particularly advising them where to file a fair housing complaint.

- **Updated Recommendation: Previous Impediment #8**

The City should provide Fair Housing and ADA education to its public officials, and review its official documents such as Master Plan and Zoning Ordinance to incorporate Fair Housing and ADA requirements.

Summary of Impediments Found

The impediments listed below are combined for the County and the City. However, the Fair Housing Impediment and Recommendation Section provide them in a separate format for Macomb County and the City of Roseville, respectively.

- 1. AI Fair Housing Reports are not being shared with Lending Institutions and Housing Providers.***

Preparation of the AI utilized the CRA performance rating of the financial institutions and HMDA data. The latest available HMDA data for the Warren-Troy-Farmington Hills MI MSA/MD at the Census Tract level was used. At first glance, it would seem that there are no potential fair housing issues in lending practices. However, analysis of the HMDA data showed that lending practices of financial institutions in the area may be interpreted to be an impediment to fair housing choice for minorities. Although discriminatory lending practices cannot be definitively identified by correlation of

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HMDA data elements, the data can display patterns in lending practices. In this case, analysis of the data revealed that minority applicants, overall, have lower rate of origination and higher rate of denial. It may be inferred that lending issues and/or credit issues may play a role in the outcome of the analysis. It appears that previous AI documents were not shared with lenders and doing so would further fair housing choice.

2. *Deficient Coordinated Fair Housing Education Efforts by the Public Sector and the Private Sector*

The County and the City had started efforts to disseminate fair housing information to the public. However, a review of the County, City and lending institutions website revealed that fair housing education and credit counseling education was scarce. Only two lending institutions had information on credit counseling. However, such information does not clarify to the reader its relationship to fair housing.

3. *Lack of Fair Housing Education and Awareness*

Due to declining funding resources, the County does not have a fair housing office or staff person. However, it should be noted, that funding has been provided to agencies to undertake fair housing, despite diminishing revenues. Given their available resources, the County should make best efforts to initiate a stronger fair housing education and outreach strategy.

4. *Racial and ethnic minorities are concentrated geographically within the County*

According PY 2010-2011 Macomb County CAPER the number of minority residents rose from 3.3% in 1990 to 7.3% in 2000 and to 16.1% in 2010. Between 2000-2005, the Asian-American population increased by 37%, the Hispanic population increased by 29%, and the number of African-Americans increased by 144%. The CAPER indicates that the County should look into the real estate practices, and the home-seeking choices made by African-American and disabled residents to determine the extent of perceived or actual unlawful discriminatory practices, since those two groups are under-represented in the general population. While racial and ethnic minorities have increased and are even concentrated geographically in certain areas of Macomb County and the City of Roseville, the data does not indicate any linkage to acts of discrimination. In fact, it must be noted that some ethnic populations such as Hispanic and Caribbean peoples tend to live close to friends and family members, which may contribute to “voluntary” concentration patterns.

5. *Availability of Housing for the Elderly*

The Regional Housing Findings and Policy Recommendations pointed to an aging population with an increase in elderly residents and fewer households with children. According to the report much of the region’s housing stock is designed to meet the needs of families with children. Elderly housing requires special features, even if it is for independent living, and most importantly for housing which provides supportive services. According to the County’s website, there are a total of 51 low and moderate income subsidized multi-family housing developments in Macomb County, of which 25

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developments are for persons 50 years or older. Efforts to address the future increase in demand for elderly housing have already started with the preparation of The Aging of Macomb County – a multi-phased countywide initiative developed to cultivate and support livable communities for all generations. Under the charge of Macomb County Department of Planning and Economic Development (MCPED) this initiative seeks to establish collaborative efforts with key stakeholders throughout the County, Region, and State in order to address the evolving need of Macomb County’s growing elderly population.

Macomb County responded to the needs identified in the survey by funding a major housing development in the City of Eastpointe, Oakwood Manor Senior Living, with funds from the NSP and HOME programs. This development will provide 40 new units of elderly rental housing affordable to low-, very-low-, and extremely-low-income households. This development was facilitated by a partnership between Macomb County and the City of Eastpointe through a for-profit developer.

6. *ADA Education*

It could not be determined what efforts were being currently undertaken concerning ADA education.

7. *Unavailability of fair housing information on websites of cities and public housing agencies including information on filing housing complaints.*

The analysis revealed that fair housing information was not readily available on the websites of municipalities or public housing agencies. There was limited or no availability of means or information on filing housing discrimination complaints.

Summary of Recommendations to Address Impediments

The recommendations listed below for Macomb County and the City of Roseville, respectively, are subject to the availability of HUD funding and the availability of local resources. The County and the City will make best efforts to use existing resources or those resources offered by HUD to address these recommendations.

Macomb County

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

Recommendation #2: The summary of findings from the SE Michigan Housing Task Force will be shared with housing providers, community development corporations, developers, lenders, municipalities and other stakeholders. Macomb County is involved in the SE Michigan Housing Task Force. Sub-grantee communities will be invited to become involved as

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participation in the fair housing component will assist the county and the cities in meeting fair housing goals.

Recommendation #3: The County will request that the local lending institutions analyze, within the five year period, the data concerning lending practices as described in the AI document. The County will request a response from the lending institutions that operate within Macomb County on the AI findings.

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

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

Recommendation #6: The County will request all Urban County participating communities that have Housing Commissions (cities of Eastpointe, Mount Clemens and New Haven) to encourage the Housing Commissions to post fair housing information on their websites, at the housing developments.

Recommendation #7: The County should approach local lending institutions about sharing fair housing information, and housing and credit counseling information through their websites. Additionally, placing links to other entities offering housing and credit counseling should be explored as well. The County should include fair housing information in its main website.

Recommendation #8: The County should use existing resources, such as the Fair Housing Center, and programs to disseminate fair housing information and provide fair housing education on fair housing laws and best practices to local officials, landlords, and the general public. The County should utilize other media outlets and avenues to disseminate fair housing information to the public, among others: cable TV (when and if available), newsletters, pamphlets, fairs, and public announcements. Include fair housing information in training opportunities. Special emphasis should be made during the annual celebration of fair housing month in April– including but not limited to a proclamation, and recognition of the fair housing month on the County's website.

Recommendation #9: The County will request a Fair Housing training/workshop to be conducted by HUD staff, and will use HUD Technical Assistance in implementing strategies to further fair housing.

Recommendation #10: The County should use existing public education programs, advocacy groups and regional groups such as the South East Michigan Housing Task Force to spread information about the positive effects of affordable housing on local communities and help

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dispel myths. The County should increase local educational campaign on the community benefits of providing affordable and inclusive housing options.

Recommendation #11: To address the increasing demand for elderly housing the County should encourage participating municipalities to utilize funds towards the rehabilitation and retro-fitting of existing housing, and have links to HUD's Elderly Housing Programs information on the County website.

Recommendation #12: The County should provide ADA education to their employees; encourage participating municipalities to provide contractors and builders with information packets regarding ADA requirements including HUD website on ADA requirements; post ADA requirements on the County website; incorporate ADA requirements in the development review and permitting process of housing construction; and the County will continue to encourage participating municipalities' funding of ADA and senior center projects.

Recommendation #13: The County should request participating communities and public housing agencies to include fair housing logo and information in all housing materials in electronic format. Staff costs involved in implementing this recommendation is projected at \$3,000.

City of Roseville

Recommendation #1: The City of Roseville should make the AI available to all lending institutions in their area. The purpose of the dialogue is to discuss the impediments to fair housing, assess fair housing efforts, and seek commonality and participation in fair housing efforts.

Recommendation #2: The findings from the SE Michigan Housing Task Force should be shared with housing providers, community development corporations, developers, lenders, and other stakeholders. The City is involved in the SE Michigan Housing Task Force.

Recommendation #3: The City will request that the local lending institutions analyze, within the five year period, the data concerning lending practices as described in the AI document. The City will request a response from the lending institutions that operate within the City on the AI findings.

Recommendation #4: The City of Roseville should include fair housing information in its main website, and include links to agencies that provide fair housing information or services such as the Detroit Fair Housing Center and the Fair Housing Office of HUD.

Recommendation #5: The City should approach local lending institutions in writing about sharing fair housing information, and housing and credit counseling information through their websites. The City should enable links with local lending institutions to offer housing and credit counseling information.

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Recommendation #6: The City of Roseville should use existing resources and programs to disseminate fair housing information and provide fair housing education on fair housing laws and best practices to local officials, landlords, and the general public. The City should utilize other media outlets and avenues to disseminate fair housing information to the public, among others: cable TV, newsletters, pamphlets, fairs, and public announcements. Special emphasis should be made during the annual celebration of fair housing month in April– including but not limited to a proclamation, and recognition of the fair housing month in the City’s website.

Recommendation #7: The City should continue to coordinate with the Continuum of Care and document the efforts of the Michigan State University Extension Service which offers homebuyer education classes and budget counseling referrals.

Recommendation #8: The City will request a Fair Housing training/workshop to be conducted by HUD staff, and will use HUD Technical Assistance in implementing strategies to further fair housing.

Recommendation #9: The City should increase local educational campaign on the community benefits of providing affordable and inclusive housing options.

Recommendation #10: The City should continue with the strategic redevelopment of vacant, foreclosed homes and creating attractive affordable housing options for homebuyers.

Recommendation #11: To address the increasing demand for elderly housing the City should continue its efforts towards the rehabilitation and retro-fitting of existing housing, and posting of HUD’s Elderly Housing Program information on its website.

Recommendation #12: The City should continue to allocate resources to transitional housing and coordinate with non-profit agencies that serve the homeless in the provision of services to the homeless special needs population.

Recommendation #13: The City should provide ADA education to their employees; provide contractors and builders with information packets regarding ADA requirements including HUD website on ADA requirements; post ADA requirements on the City website; incorporate ADA requirements in the development review and permitting process of housing construction; and continue to provide funds to ADA/ senior related projects.

AI Funding

According to the Macomb County Consolidated Plan for FY 2010-2014, the County has not designated direct funding for fair housing activities or services. In addition, according to the City of Roseville Consolidated Annual Performance Evaluation Report for FY 2010-2011, no direct funding was allocated for fair housing activities or services. However, Macomb County and the City of Roseville shared the cost of preparing the Analysis of Impediments in the amount of twelve thousand dollars (\$12,000.00).

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II. COMMUNITY PROFILE

Introduction

The 2010 U.S. Census represents the most recent data from the U.S. Census, and that data is used for this report when possible and available. Some areas of data-gathering, however, requires use of the American Community Survey which provides most informational items as the decennial Census, but not always at the lowest geographic levels. The 2010 Census, Community Survey, in addition to a variety of other highly regarded data sources were utilized for the preparation of this report, including Home Mortgage Disclosure Act (HMDA) data; RealtyTrac data service; official Macomb County and City of Roseville planning and reporting documents, and direct communication with local agencies. Overall, the data paint a revealing and fair portrait of the community and housing conditions therein.

Summary

The data detailed below shows that the population of Macomb County and the Roseville is becoming more diverse. The white population decreased by 7.3% from 2000 to 2010. However, the majority population of these two areas is still relatively high in 2010 at 85.4% for Macomb County and the City of Roseville at 83.1%. The minority population that has increased most noticeably is the Black population now at 8.6% according to the 2010 census. The Hispanic population has also increased since 2000 but is still low at 2% of the population for Macomb County. Much of the population change is due in part to the fact that cities in the southern section of Macomb County are attractive as a suburban destination for Detroit families who want to move out of Detroit. Macomb County shares its southern boundaries with the City of Detroit. Communities such as Eastpointe and Centerline border the City of Detroit. Roseville is also attractive because it is also close to the Detroit border. The data does not show any correlation between increases in protected classes and reported discrimination in these cities. The concentration shown on the maps of minority populations in certain areas and communities seem to have more to do with family attachments and a voluntary desire rather than steering of buyers to these communities. Realtors state that typically friends recommend friends to communities if they are satisfied with the living environment. However, the increase in minority populations and the relatively large majority population does have implications for fair housing.

Increases in the protected classes in a community can create the potential for discrimination or NIMBYism (Not In My Backyard). As such, minorities and other protected classes may be subject to discrimination and should need education and awareness of their fair housing rights. In addition, the majority population also needs to be aware of fair housing regulations. The data also shows poverty rates as being higher in communities with a higher concentration of minority families.

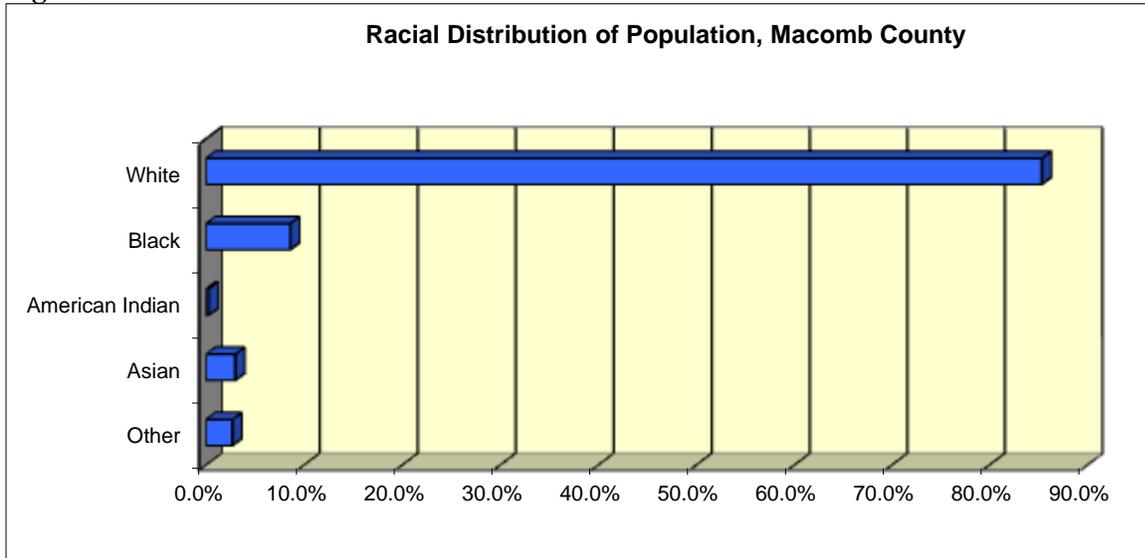
Population, Race, and Ethnicity

Macomb County had a total population of 840,978 at the time of the 2010 Census. The 2000 Census reflects a population of 788,149. Macomb County had a population growth over the ten year period of 52,829 persons from 2000 to 2010. According to the 2010 Census, the racial makeup of Macomb County was primarily White (85.4%), but also included populations identifying themselves as Black (8.6%), American Indian (0.3%), Asian (3.0%), and other races (2.7%), including two or more (2.1%). Comparatively, the 2000 Census identifies Macomb

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County as 92.7% White. Over 2% (19,095) of Macomb County's 2010 population identified themselves as being of Latino or Hispanic origin.

Figure 1



Source: 2010 U.S. Census

Areas in the northern half of the County show a much lower population of persons within the protected classes. These include communities such as Armada Village, Romeo Village, Richmond, Memphis, and New Haven.

Macomb County does not include any unincorporated areas and both the County and the City of Roseville seek to target federal resources to areas with lower incomes. The data coincidentally shows that poverty rates, household characteristics and income levels are also co-related with the areas with higher minority populations.

Part of the challenge that Macomb County has in affirmatively furthering fair housing is that it is a urban county that provides and administers federal funding on behalf of 22 separate municipalities. The relationship between the County and the municipalities is one in which the County is able to dictate specific actions to the municipalities. The County can provide the basic framework for following the regulations to affirmatively further fair housing but cannot mandate those requirements or have the infrastructure to maintain compliance.

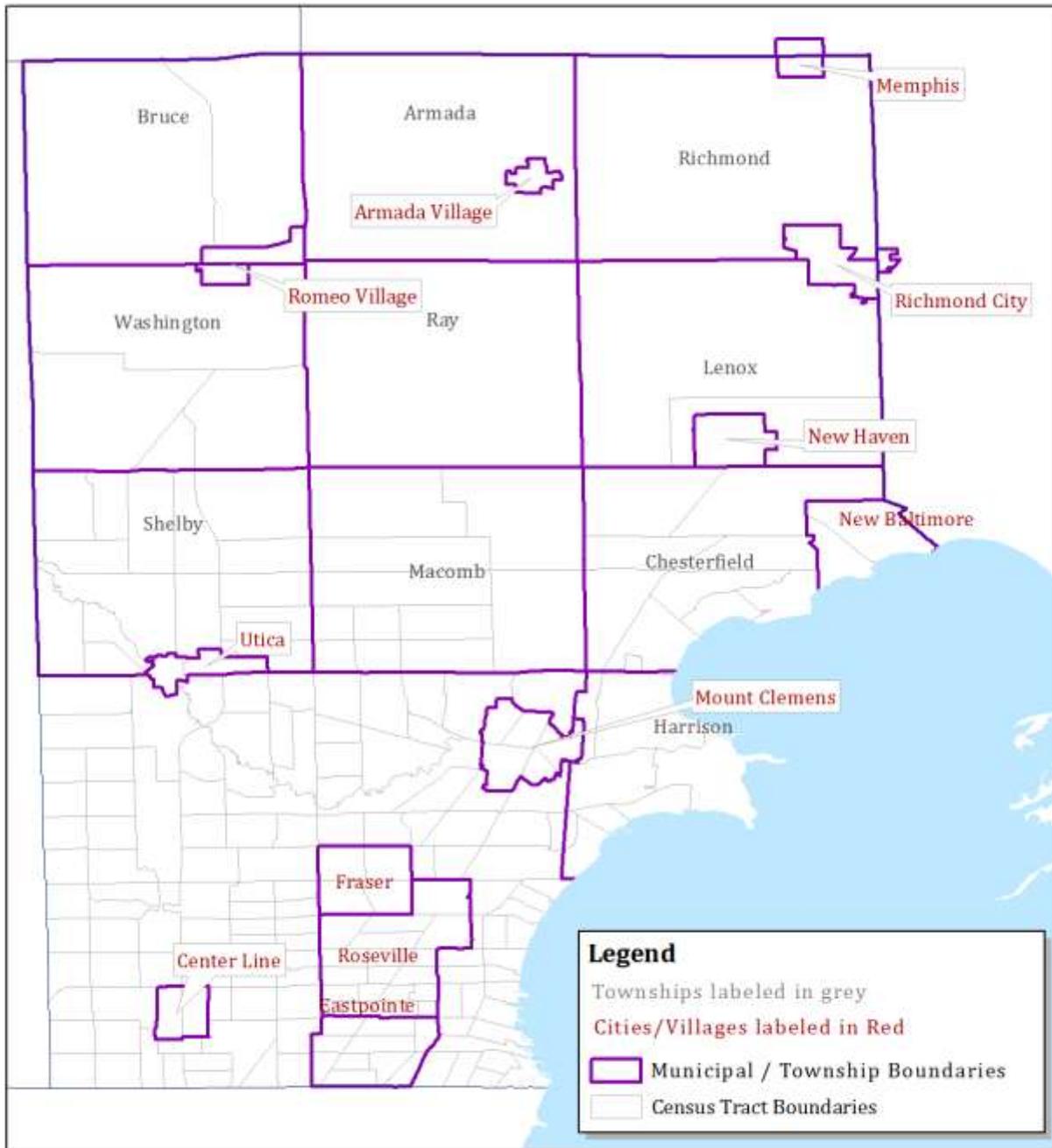
Some demographic such as the number of families on public assistance showed high levels for communities such as Bruce Township, Romeo Village, New Haven, and Lenox Township. These demographics do not track with other indices.

Maps #1, 2, and 3 on the following pages show Macomb County and the City of Roseville's municipal and census tract boundaries and low to moderate income census areas as defined by HUD.

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Map 1

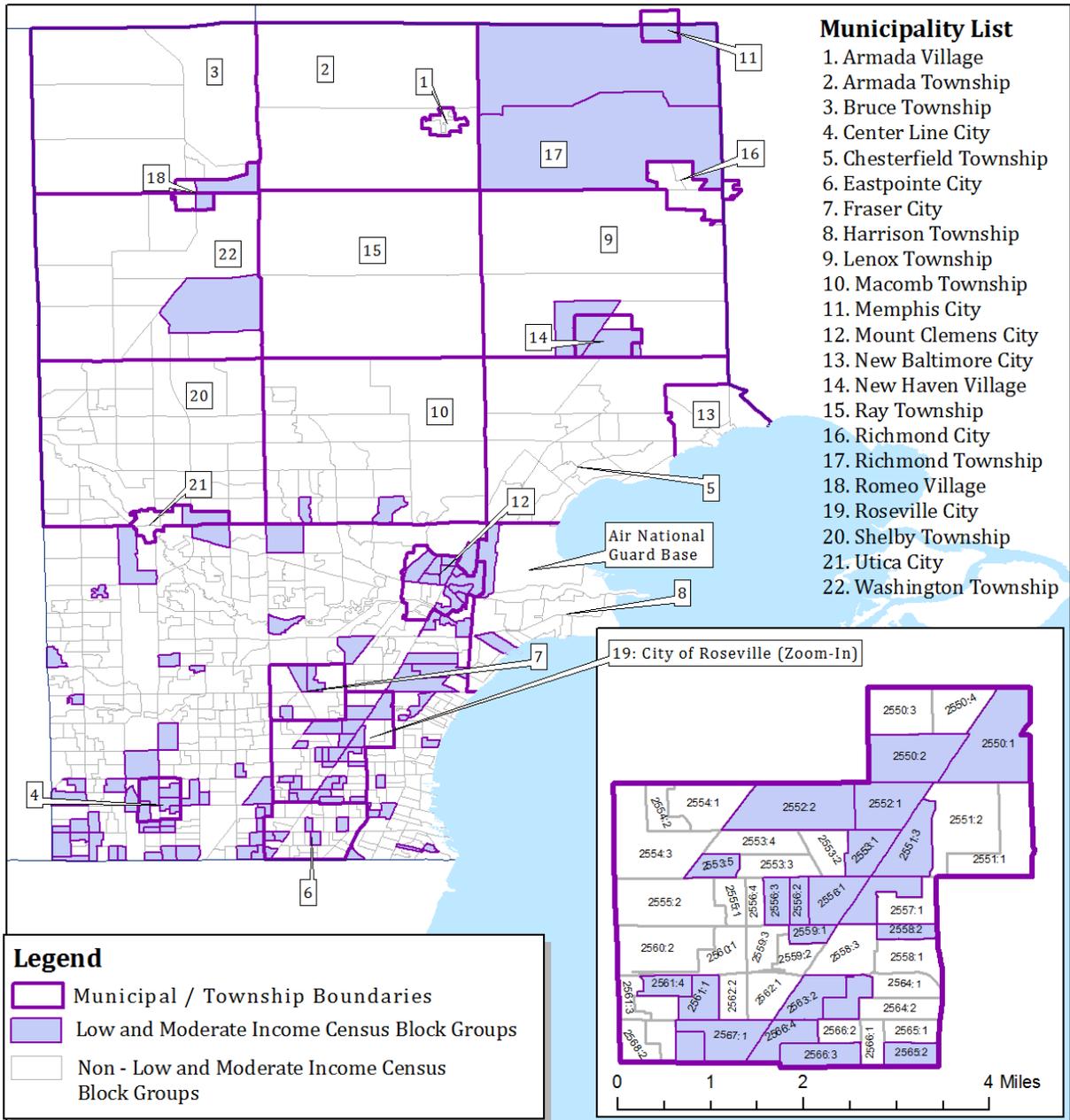
Municipalities of Macomb County



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Map 3

Macomb County: Low and Moderate Income Census Block Groups as Defined by HUD for 2012



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Within the municipalities in Macomb County, the 2010 Census reports the following population counts.

Table 1 - Population by Race and Ethnicity by City – Macomb County

Macomb County	# of Persons	% of Persons
Total Population	840,978	100.0%
White	717,973	85.4%
Black or African- American	72,723	8.6%
American Indian and Alaska Native	2,646	0.3%
Asian	25,063	3.0%
All Other Races	22,573	2.7%
Hispanic or Latino Ethnicity	19,095	2.3%

Armada (Village)	# of Persons	% of Persons
Total Population	1,730	100.0%
White	1,714	99.1%
Black or African- American	6	0.3%
American Indian and Alaska Native	2	0.1%
Asian	2	0.1%
All Other Races	6	0.3%
Hispanic or Latino Ethnicity	45	2.6%

Armada Township	# of Persons	% of Persons
Total Population	5,379	100.0%
White	5,274	98.0%
Black or African- American	18	0.3%
American Indian and Alaska Native	13	0.2%
Asian	19	0.4%
All Other Races	55	1.1%
Hispanic or Latino Ethnicity	97	1.8%

Bruce Township	# of Persons	% of Persons
Total Population	8,700	100.0%
White	8,273	95.1%
Black or African- American	139	1.6%
American Indian and	21	0.2%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Bruce Township	# of Persons	% of Persons
Alaska Native		
Asian	40	0.5%
All Other Races	227	2.6%
Hispanic or Latino Ethnicity	415	4.8%

Center Line	# of Persons	% of Persons
Total Population	8,257	100.0%
White	6,812	82.5%
Black or African- American	992	12.0%
American Indian and Alaska Native	29	0.4%
Asian	205	2.5%
All Other Races	219	2.6%
Hispanic or Latino Ethnicity	140	1.7%

Chesterfield Township	# of Persons	% of Persons
Total Population	43,381	100.0%
White	39,411	90.8%
Black or African- American	2,285	5.3%
American Indian and Alaska Native	159	0.4%
Asian	415	1.0%
All Other Races	1,111	2.5%
Hispanic or Latino Ethnicity	1,038	2.4%

Eastpointe	# of Persons	% of Persons
Total Population	32,442	100.0%
White	21,297	65.6%
Black or African- American	9,575	29.5%
American Indian and Alaska Native	130	0.4%
Asian	353	1.1%
All Other Races	1,087	3.4%
Hispanic or Latino Ethnicity	677	2.1%

Fraser	# of Persons	% of Persons
Total Population	14,480	100.0%
White	13,319	92.0%
Black or African- American	566	3.9%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Fraser	# of Persons	% of Persons
American Indian and Alaska Native	74	0.5%
Asian	211	1.5%
All Other Races	310	2.1%
Hispanic or Latino Ethnicity	297	2.1%

Harrison Township	# of Persons	% of Persons
Total Population	24,587	100.0%
White	21,883	89.0%
Black or African- American	1,824	7.4%
American Indian and Alaska Native	84	0.3%
Asian	170	0.7%
All Other Races	626	2.6%
Hispanic or Latino Ethnicity	627	2.6%

Lenox Township	# of Persons	% of Persons
Total Population	10,470	100.0%
White	8,479	81.0%
Black or African- American	1,521	14.5%
American Indian and Alaska Native	57	0.5%
Asian	51	0.5%
All Other Races	362	3.5%
Hispanic or Latino Ethnicity	398	3.8%

Macomb Township	# of Persons	% of Persons
Total Population	79,580	100.0%
White	72,050	90.5%
Black or African- American	3,131	3.9%
American Indian and Alaska Native	161	0.2%
Asian	2,462	3.1%
All Other Races	1,776	2.3%
Hispanic or Latino Ethnicity	1,803	2.3%

Memphis	# of Persons	% of Persons
Total Population	823	100.0%
White	810	98.4%
Black or African- American	3	0.4%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Memphis	# of Persons	% of Persons
American Indian and Alaska Native	2	0.2%
Asian	0	0%
All Other Races	8	1.0%
Hispanic or Latino Ethnicity	17	2.1%

Mount Clemens	# of Persons	% of Persons
Total Population	16,314	100.0%
White	11,417	70.0%
Black or African- American	4,038	24.8%
American Indian and Alaska Native	57	0.3%
Asian	82	0.5%
All Other Races	720	4.4%
Hispanic or Latino Ethnicity	477	2.9%

New Baltimore	# of Persons	% of Persons
Total Population	12,084	100.0%
White	11,402	94.4%
Black or African- American	332	2.7%
American Indian and Alaska Native	49	0.4%
Asian	104	0.9%
All Other Races	197	1.6%
Hispanic or Latino Ethnicity	221	1.8%

New Haven	# of Persons	% of Persons
Total Population	4,642	100.0%
White	3,540	76.3%
Black or African- American	786	16.9%
American Indian and Alaska Native	23	0.5%
Asian	22	0.5%
All Other Races	271	5.8%
Hispanic or Latino Ethnicity	223	4.8%

Ray Township	# of Persons	% of Persons
Total Population	3,739	100.0%
White	3,648	97.6%
Black or	15	0.4%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

African- American		
American Indian and Alaska Native	11	0.3%
Asian	28	0.7%
All Other Races	37	1.0%
Hispanic or Latino Ethnicity	47	1.3%

Richmond (City)	# of Persons	% of Persons
Total Population	5,733	100.0%
White	5,398	94.2%
Black or African- American	58	1.0%
American Indian and Alaska Native	17	0.3%
Asian	12	0.2%
All Other Races	248	4.3%
Hispanic or Latino Ethnicity	263	4.6%

Richmond Township	# of Persons	% of Persons
Total Population	3,665	100.0%
White	3,537	96.5%
Black or African- American	32	0.9%
American Indian and Alaska Native	15	0.4%
Asian	3	0.1%
All Other Races	78	2.1%
Hispanic or Latino Ethnicity	67	1.8%

Roseville	# of Persons	% of Persons
Total Population	47,299	100.0%
White	39,311	83.1%
Black or African- American	5,583	11.8%
American Indian and Alaska Native	201	0.4%
Asian	758	1.6%
All Other Races	1,446	3.1%
Hispanic or Latino Ethnicity	951	2.0%

Romeo	# of Persons	% of Persons
Total Population	3,596	100.0%
White	3,303	91.9%
Black or African- American	137	3.8%
American Indian and Alaska Native	6	0.2%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Asian	18	0.5%
All Other Races	132	3.6%
Hispanic or Latino Ethnicity	206	5.7%

Shelby	# of Persons	% of Persons
Total Population	73,804	100.0%
White	39,311	83.1%
Black or African- American	5,583	11.8%
American Indian and Alaska Native	201	0.4%
Asian	758	1.6%
All Other Races	1,446	3.1%
Hispanic or Latino Ethnicity	1,777	2.4%

Utica	# of Persons	% of Persons
Total Population	4,757	100.0%
White	4,300	90.4%
Black or African- American	92	1.9%
American Indian and Alaska Native	23	0.5%
Asian	167	3.5%
All Other Races	175	3.7%
Hispanic or Latino Ethnicity	183	3.8%

Washington Township	# of Persons	% of Persons
Total Population	25,139	100.0%
White	23,824	94.8%
Black or African- American	395	1.6%
American Indian and Alaska Native	51	0.2%
Asian	263	1.0%
All Other Races	606	2.4%
Hispanic or Latino Ethnicity	971	3.9%

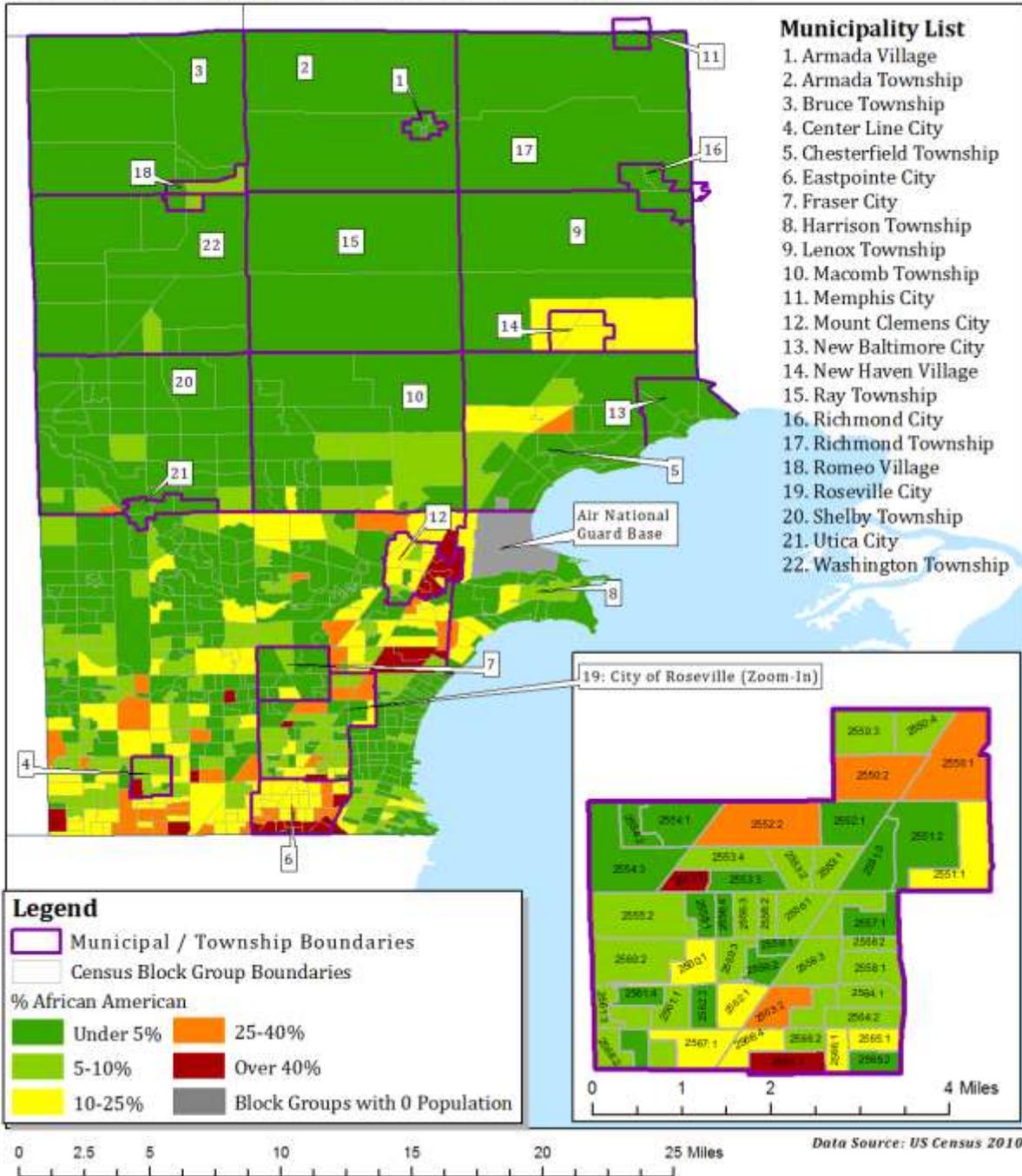
Source: 2010 U.S. Census

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

The following maps show the demographic distribution of minority populations in the County and the City of Roseville:

Map 4

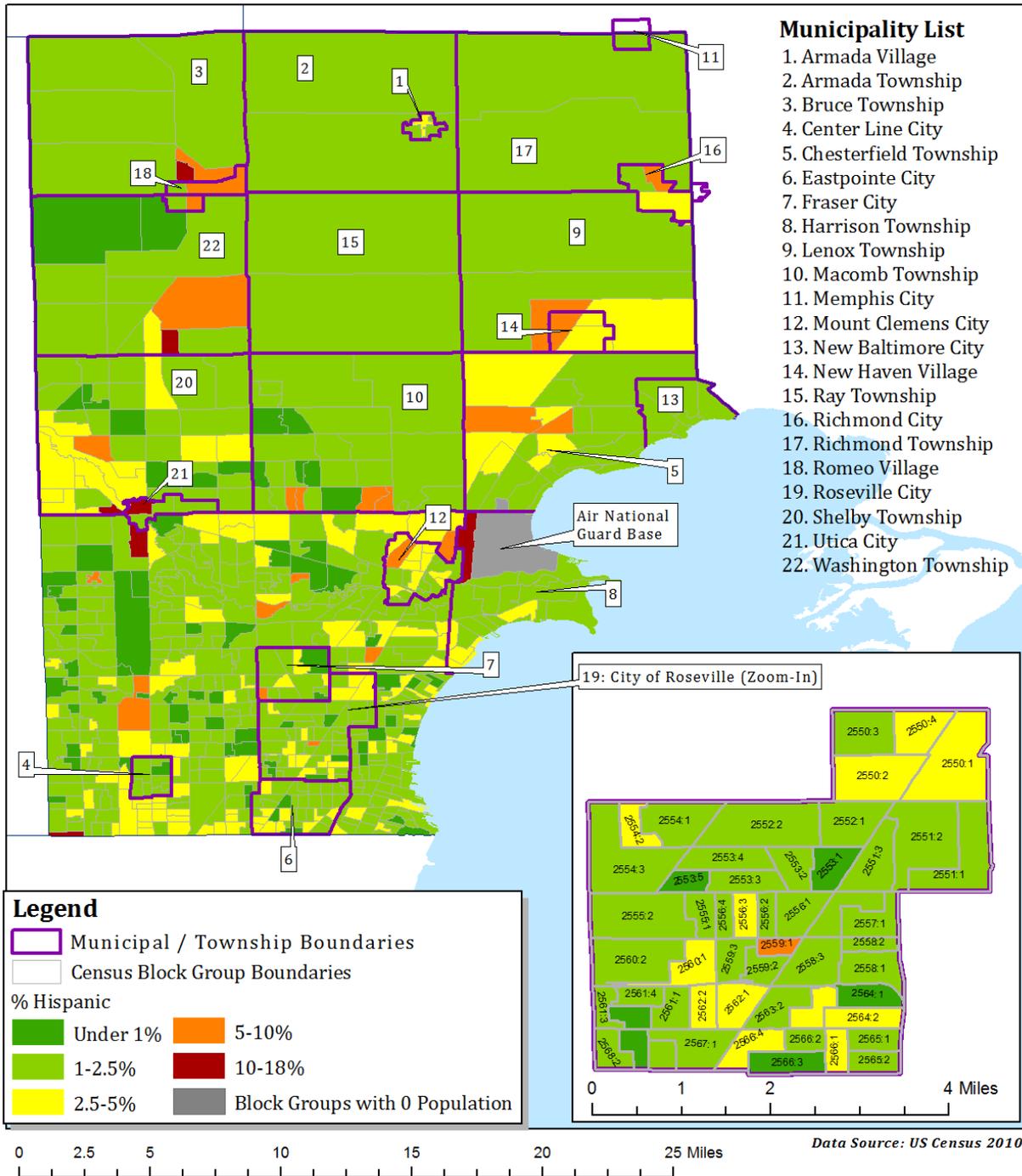
Macomb County: Percent African American in 2010



Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Map 5

Macomb County: Percent Hispanic in 2010

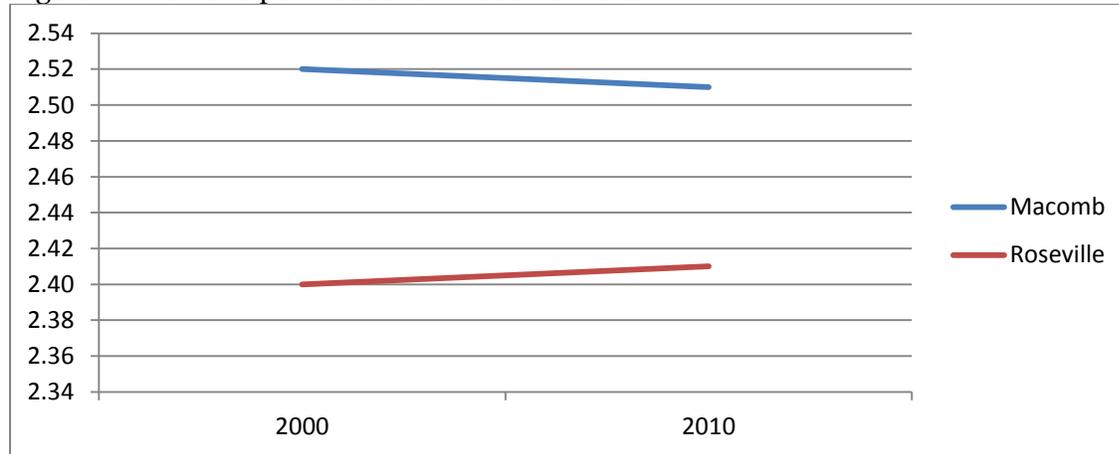


Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Household Characteristics

Since the 2000 Census, the average household size in Macomb County has decreased slightly from 2.52 persons per household to 2.51 persons per household (2010 Census).

Figure 2 – Persons per Household 2000 vs. 2010

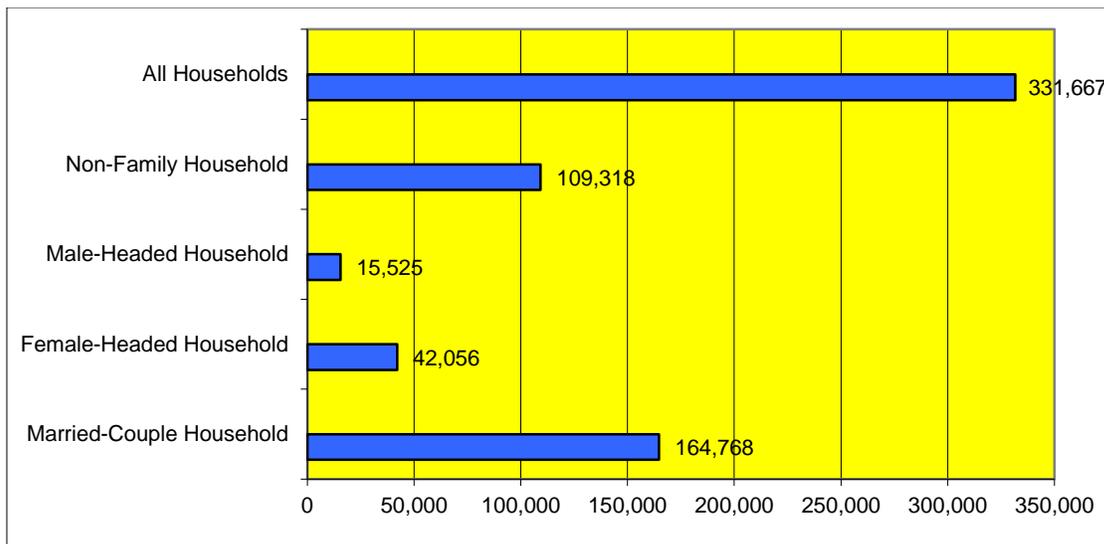


Source: U.S. Census Bureau, 2000 and 2010 Census

Since the 2000 Census, the average household size in the City of Roseville has increased slightly from 2.40 persons per household to 2.41 persons per household (2010 Census).

According to the 2010 U.S. Census, among Macomb County's 331,667 households, family households represented 67% of all households, including: 164,768 (49.7%) married couple families; 15,525 (4.7%) male-headed households; and 42,056 (12.7%) female-headed households. Non-family households comprised a significant amount at 33% (109,318) of all households.

Figure 3- Household Types among All Households, Macomb County



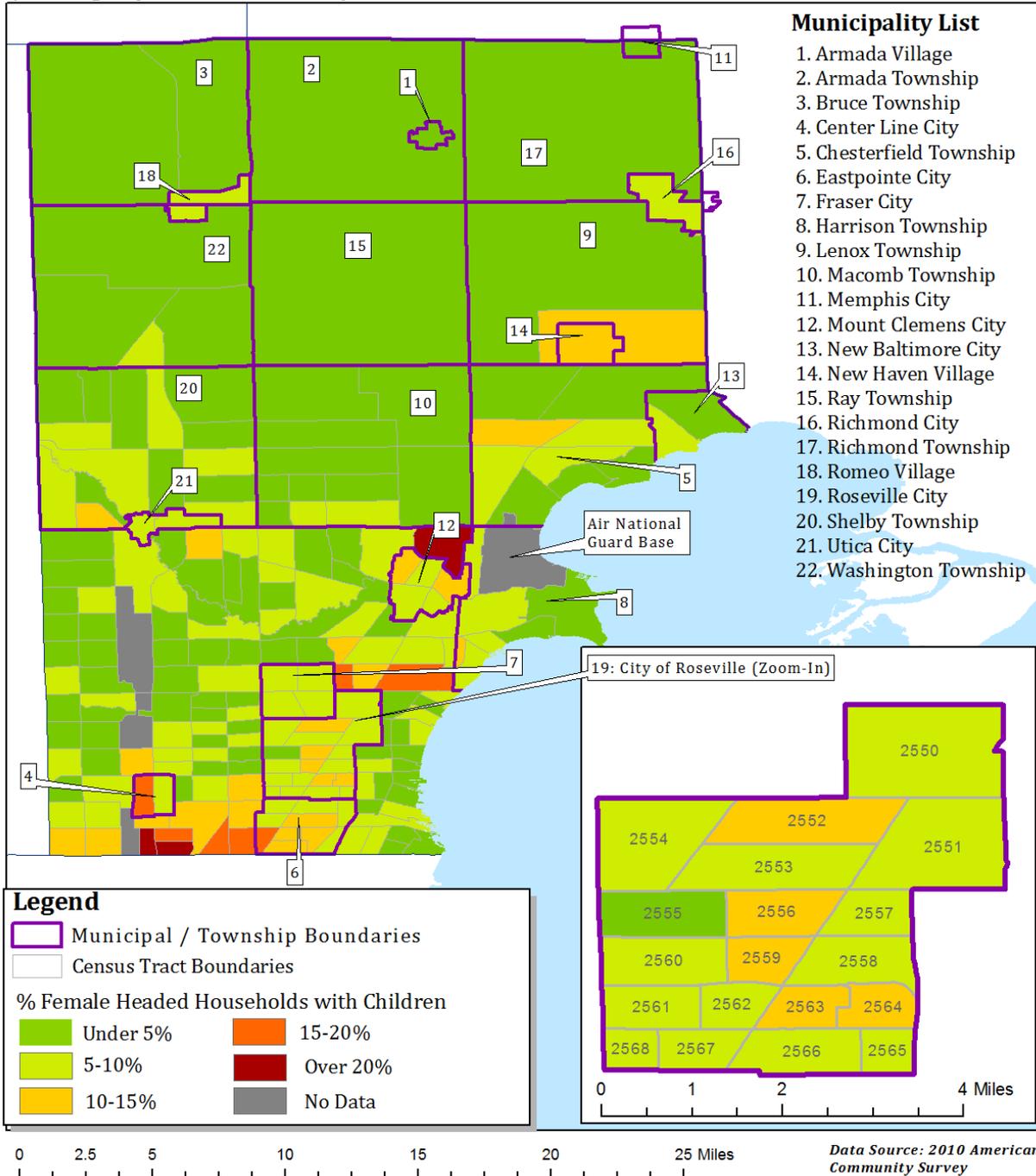
Source: 2010 U.S. Census

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

The following maps show household characteristics of Macomb County and the City of Roseville:

Map 6

**Macomb County: Percent Female Headed Households with Children
(Averages from 2006-2010)**

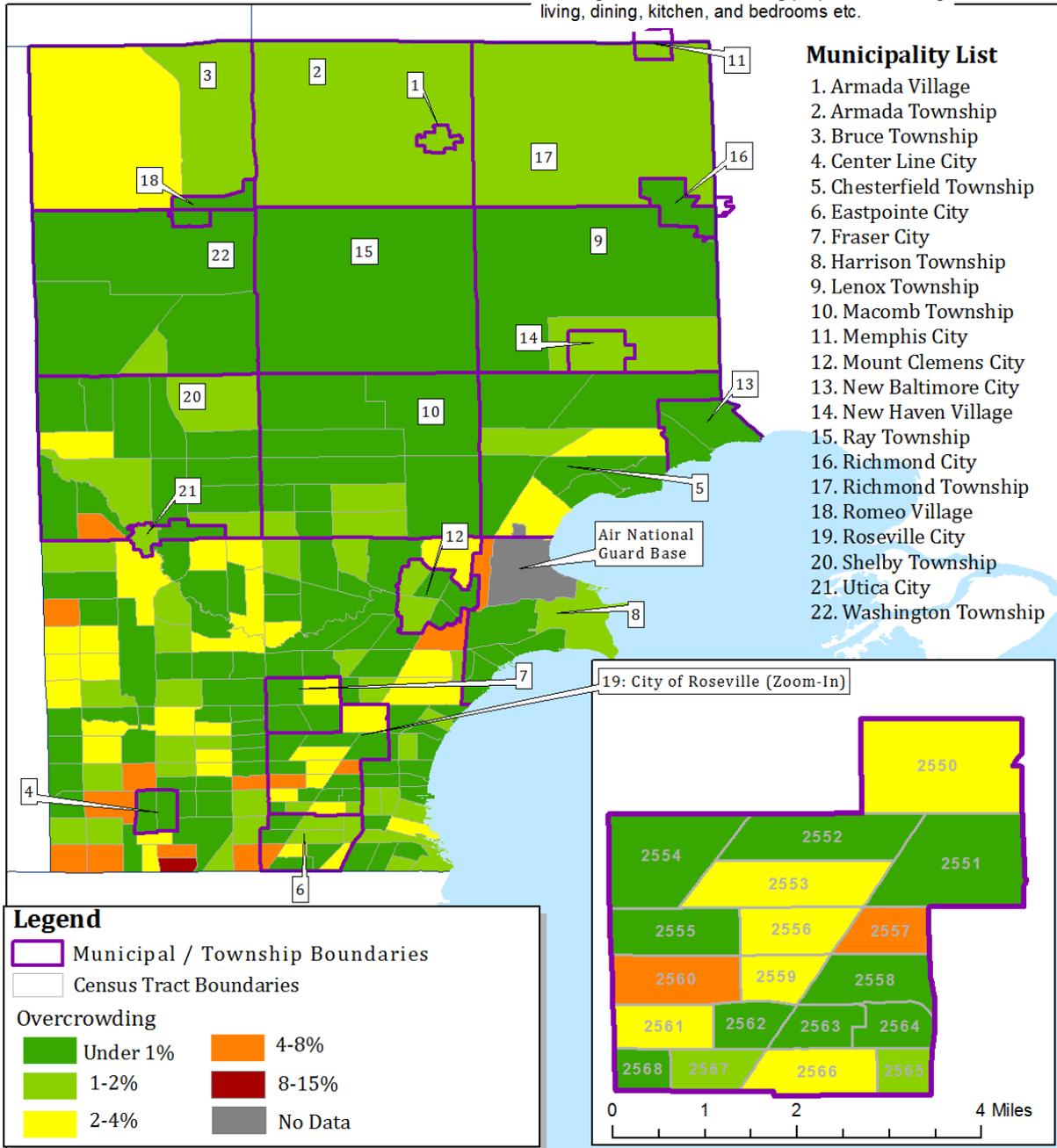


Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Map 7

Macomb County: Overcrowding Averages from 2006-2010*

* HUD defines overcrowding as more than one person per room. A "room", as defined by the Census, is an enclosed area within a dwelling which is used for living purposes, including living, dining, kitchen, and bedrooms etc.



Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census data (2010) for the City of Roseville shows that among Roseville’s 19,553 households, family households represented 62% of all households, including: 7,494 (38.3%) married couple families; 1,165 (6.0%) male-headed households; and 3,396 (17.4%) female-headed households. Non-family households comprised a significant amount at 38% (7,498) of all households.

Further analysis of Macomb County households uses data from the 2010 American Community Survey (ACS). The 2010 ACS estimates 332,628 households in Macomb County, and shows that married couple families were most often homeowners at 45.4% (150,918) of all households, followed by non-family households at 21.0% (69,556). Female-headed households exceeded numbers of male-headed households in terms of homeownership: 24,972 (7.4%) female-headed were homeowners and 10,322 (3.1%) male-headed. The married couple rate of homeownership greatly exceeded their respective rental rates. Male-headed and female-headed householders were more likely to be owners than renters. Married-couple families exhibited the greatest discrepancy between rates of homeownership and renting with 45.4% owning and 5.4% renting.

Income, Education, and Employment

Income Characteristics

HUD’s 2010 Income Limits for Maricopa County (part of the Detroit-Warren-Livonia HUD Metro FMR Area), defined Extremely Low (30%) Income Limits as those earning no more than \$34,900; Very Low Income (50%) Income Limits as those earning no more than \$20,950; and Low Income (80%) Income Limits as those earning no more than \$55,850. All figures are based on a household size of four (4) and 2010 Area Median Income of \$69,800 for Maricopa County.

Table 2 - FY 2010 Macomb County HUD Income Limits Summary

FY 2010 Income Limit Category	1 Person Household	2 Person HH	3 Person HH	4 Person HH	5 Person HH	6 Person HH	7 Person HH	8 Person HH
Extremely Low (30%) Income Limits	\$24,450	\$27,950	\$31,450	\$34,900	\$37,700	\$40,500	\$43,300	\$46,100
Very Low (50%) Income Limits	\$14,700	\$16,800	\$18,900	\$20,950	\$22,650	\$24,350	\$26,000	\$27,700
Low (80%) Income Limits	\$39,100	\$44,700	\$50,300	\$55,850	\$60,350	\$64,800	\$69,300	\$73,750

Source – US HUD

According to the 2010 American Community Survey (ACS), the median household income in Macomb County was \$49,160, an decrease of approximately 5% of 2000 (\$52,102). The City of Roseville 2010 median household income was \$39,957. The 2010 ACS also shows the median household income for municipalities within Macomb County, as shown below.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Table 3 - FY 2010 Macomb County Median Household income

Municipality	Median Household Income
Armada (Village)	\$64,773
Armada Township	\$70,451
Bruce Township	\$68,387
Center Line	\$32,818
Chesterfield Township	\$65,940
Clinton Township	\$44,527
Eastpointe	\$43,360
Fraser	\$54,302
Harrison Township	\$48,651
Lenox Township	\$60,353
Macomb Township	\$81,563
Memphis	\$39,191
Mount Clemens	\$32,148
New Baltimore	\$83,278
New Haven	\$57,955
Ray Township	\$67,344
Richmond (City)	\$52,658
Richmond Township	\$69,591
Romeo	\$44,355
Roseville	\$39,957
Shelby Township	\$56,276
Utica	\$46,250
Washington Township	\$67,369

Source 2010 US Census

Further examination of household income distribution in Macomb County shows that a majority of households in the county possess average incomes. In 2010, of the total 332,628 households in Macomb County, 23% (77,298) earned less than \$25,000 annually, with another 27% (91,467) having earned between \$25,000 and \$50,000. Slightly less than half of the households (49%) earned incomes the middle and upper brackets in 2010, with over 18% (60,620) having earned between \$50,000 and \$75,000; 14% (47,004) having earned between \$75,000 and \$100,000; and 17% (56,239) having earned more than \$100,000.

Table 4 -Macomb County Household Income Levels

INCOME LEVEL	# OF HOUSEHOLDS	% OF HOUSEHOLDS
Less than \$10,000	20,454	6.1
\$10,000 to \$14,999	18,643	5.6
\$15,000 to \$24,999	38,201	11.5
\$25,000 to \$34,999	38,780	11.7
\$35,000 to \$49,999	52,687	15.8
\$50,000 to \$74,999	60,620	18.2
\$75,000 to \$99,999	47,004	14.1
\$100,000 to \$149,99	39,848	12.0

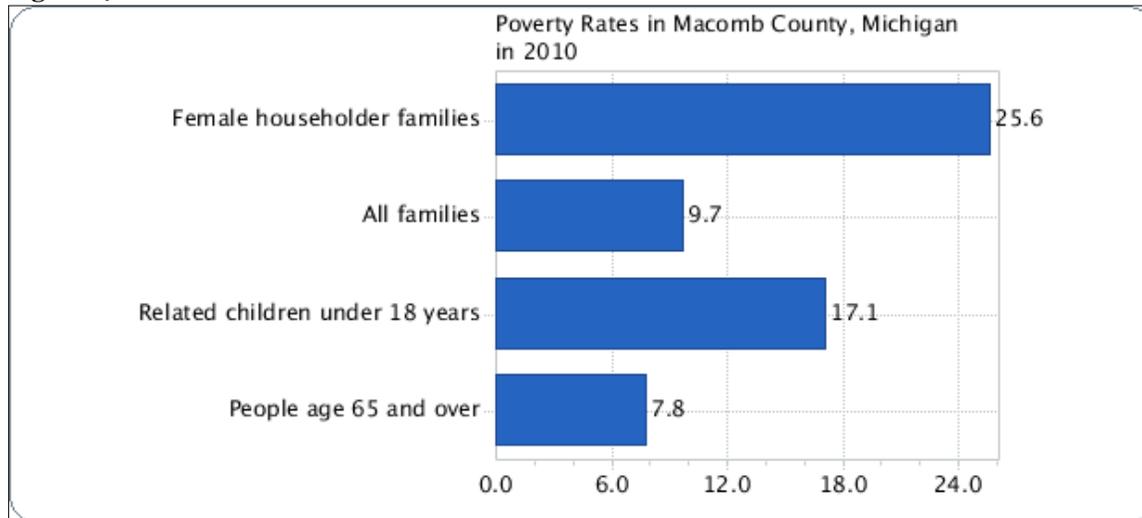
Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

INCOME LEVEL	# OF HOUSEHOLDS	% OF HOUSEHOLDS
\$150,000 to \$199,999	11,453	3.4
\$200,000 or more	4,938	1.5

Source: 2010 American Community Survey, U.S. Census Bureau

Per the American Community Survey, 13% of people in Macomb County were in poverty in 2010. Seventeen percent of related children under 18 were below the poverty level, compared with 8% of people 65 years old and over. Ten percent of all families and 26% of families with a female head of household had incomes below the poverty level.

Figure 4

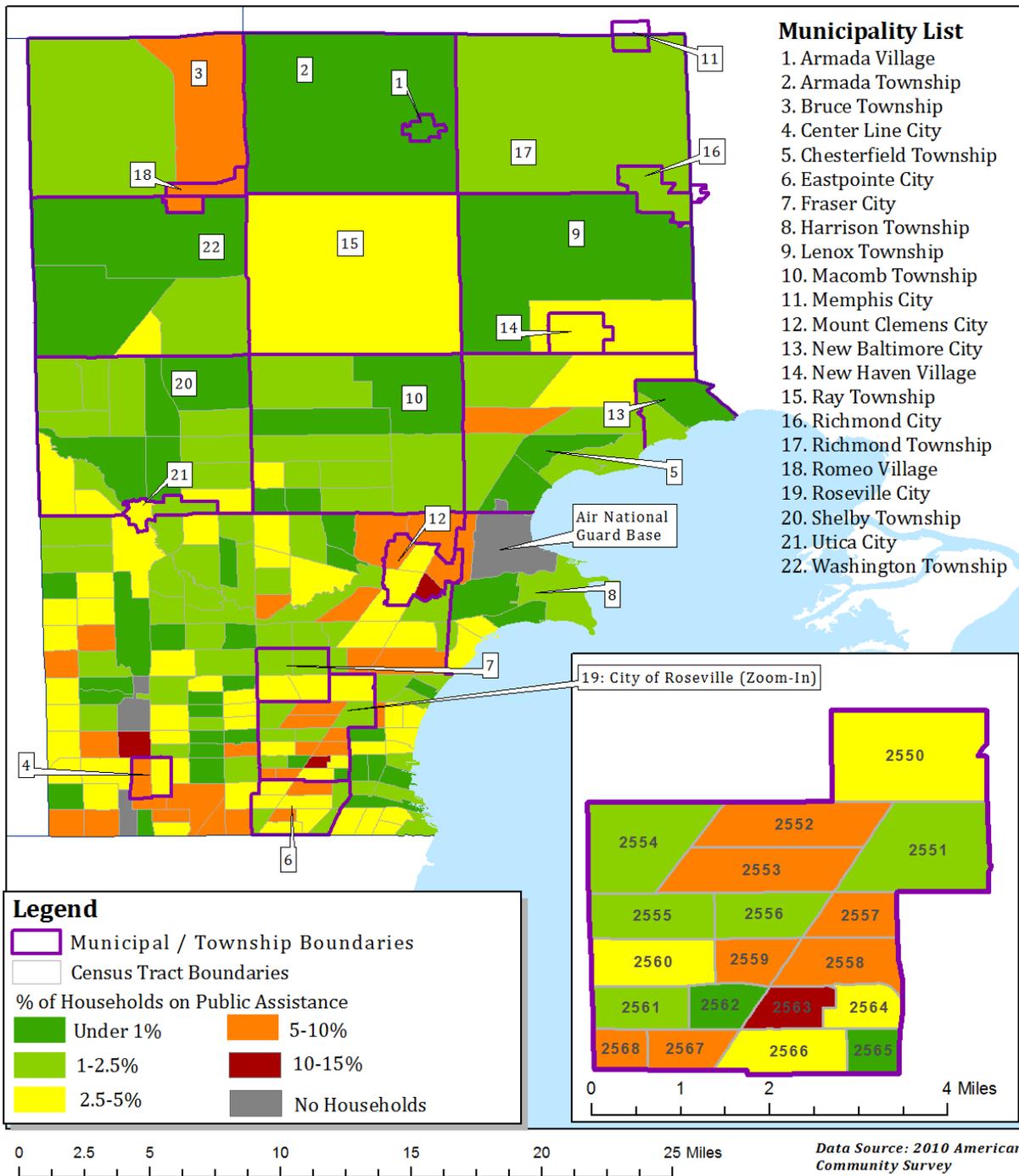


In 2010, approximately 31% of Macomb County’s household population received Social Security income. An additional 21% received other public assistance such as SSI, cash public assistance income, or Food Stamp/SNAP benefits. The following figure depicts the income distribution of all households in Macomb County.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Map 8

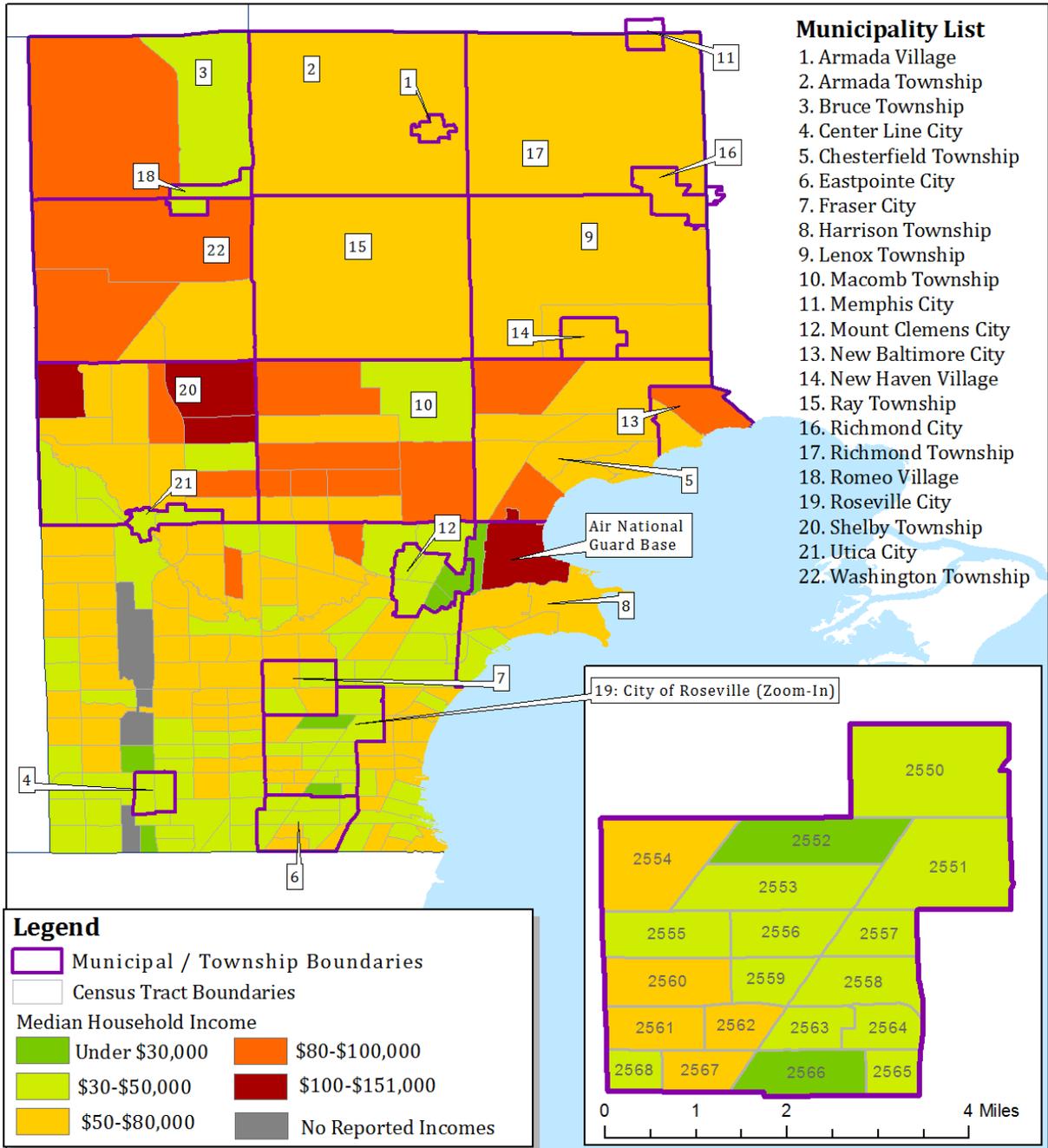
Macomb County: Percent of Households on Public Assistance Averages 2006-2010



Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Map 9

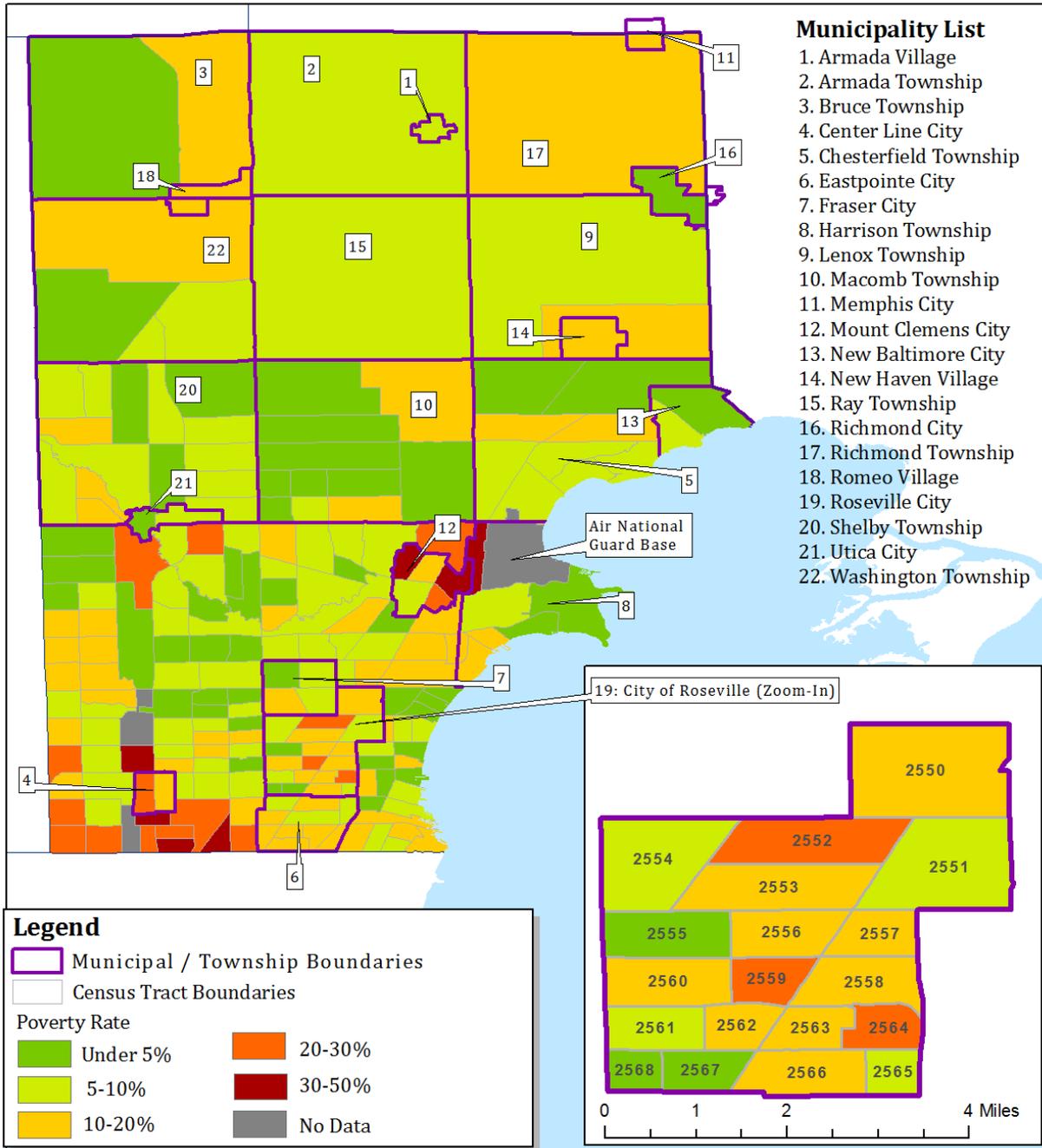
Macomb County: Median Household Income Averages 2006-2010



Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

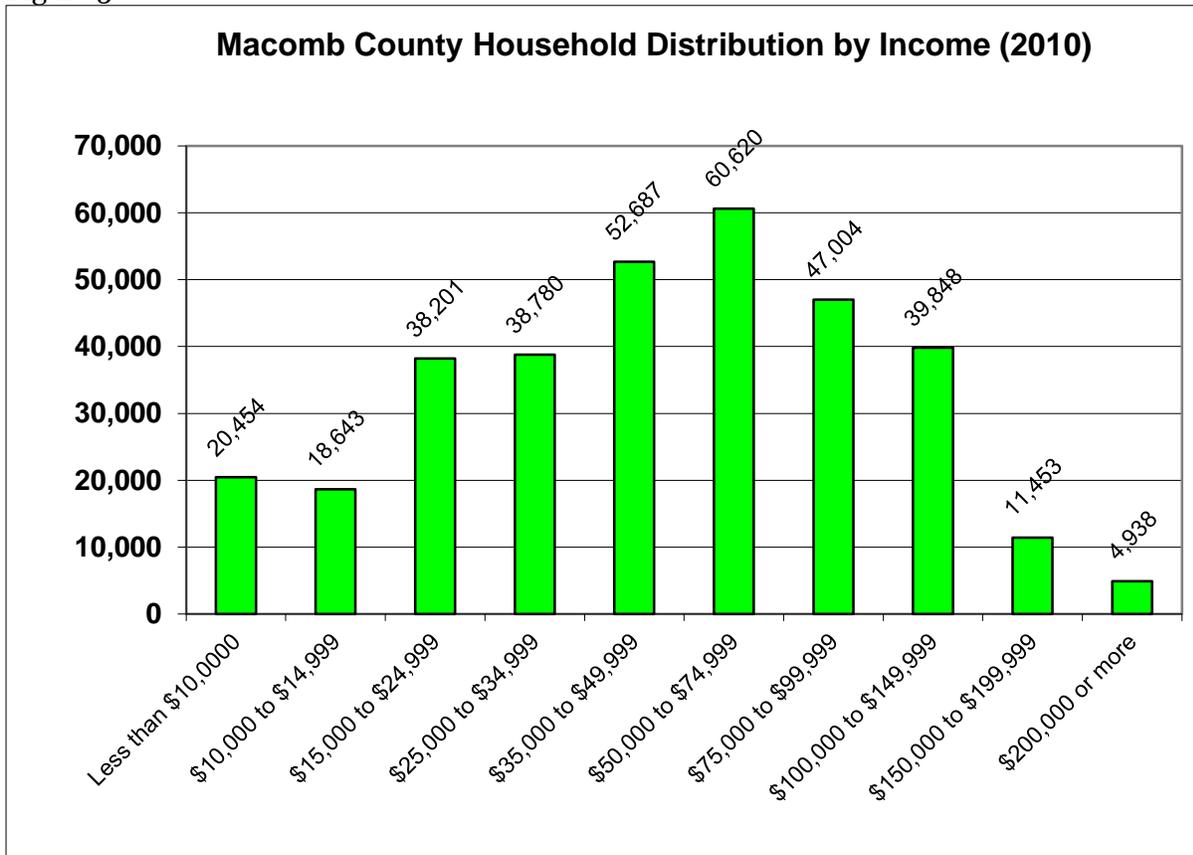
Map 10

Macomb County: Poverty Rate Averages 2006-2010



Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Figure 5



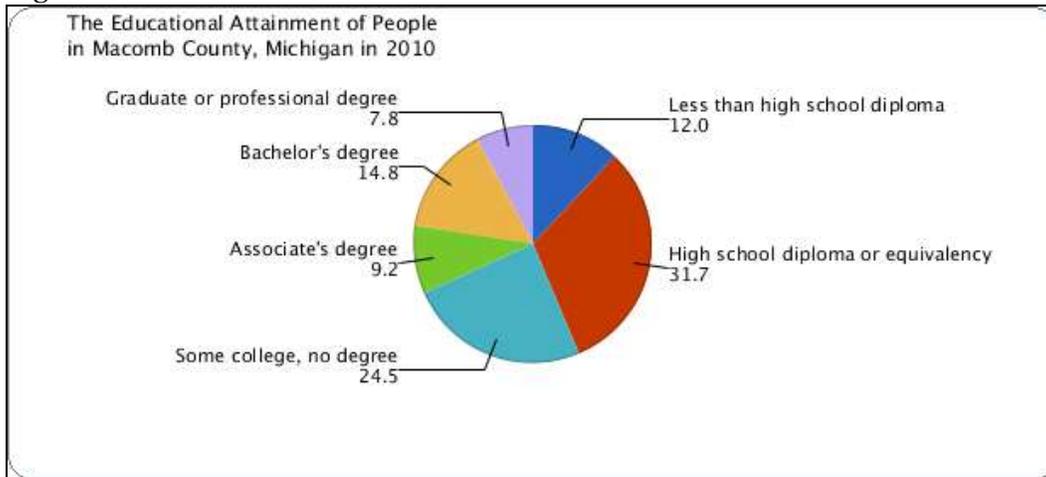
Source: U.S. Census Bureau, 2010 American Community Survey

Educational Attainment

According to the 2010 ACS, 32% of people 25 years and over had at least graduated from high school and 23% had a bachelor's degree or higher. Twelve percent were classified by the U.S. Census as dropouts; they were not enrolled in school and had not graduated from high school. The total school enrollment in Macomb County, Michigan was 219,000 in 2010. Nursery school and kindergarten enrollment was 19,000 and elementary or high school enrollment was 137,000 children. College or graduate school enrollment was 64,000.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

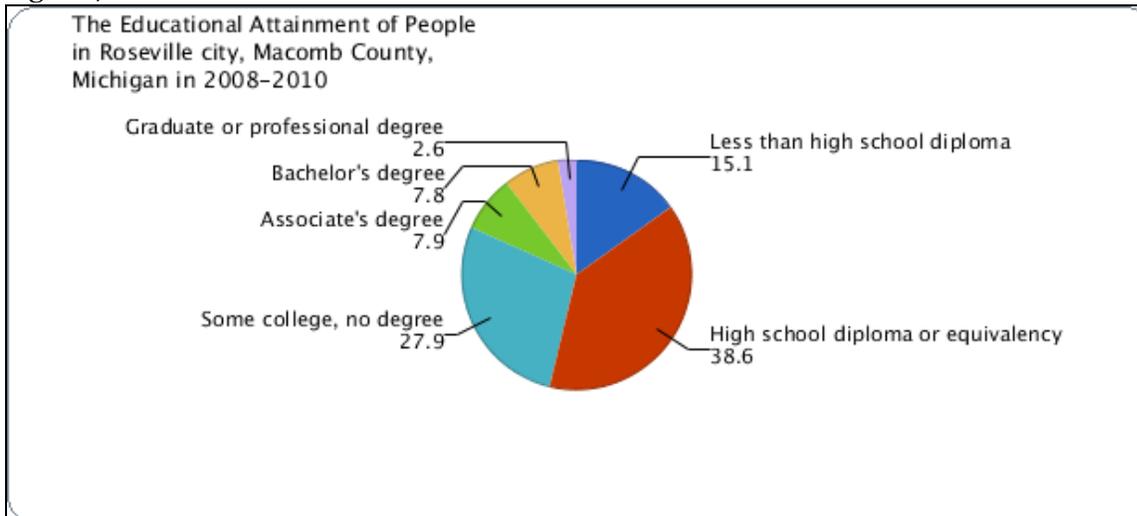
Figure 6



Source: U.S. Census Bureau, 2008- 2010 American Community Survey

For the City of Roseville, 2008-2010 ACS data shows 39% of people 25 years and over had at least graduated from high school and 10% had a bachelor's degree or higher. Fifteen percent were classified by the U.S. Census as dropouts; they were not enrolled in school and had not graduated from high school. The total school enrollment in Roseville was 12,000 in 2010. Nursery school and kindergarten enrollment was 1,300 and elementary or high school enrollment was 7,300 children. College or graduate school enrollment was 3,700.

Figure 7



Source: U.S. Census Bureau, 2008- 2010 American Community Survey

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Employment

As of the 2010 ACS, Macomb County’s population aged 16 years and over numbered 671,508 persons, of which approximately 65% (436,991 persons) was in the labor force. In Macomb County, 55% of the population aged 16 and over were employed, 10% were unemployed, and 35% were not currently in the labor force. Eighty-five percent of the people employed were private wage and salary workers; 11% were federal, state, or local government workers; and 4 percent were self-employed in their own (not incorporated) business.

Table 5

Macomb County Worker Description	Number	Percent
Private wage and salary workers	314,192	85.2
Federal, state, or local government workers	39,688	10.8
Self-employed workers in own not incorporated business	14,480	3.9

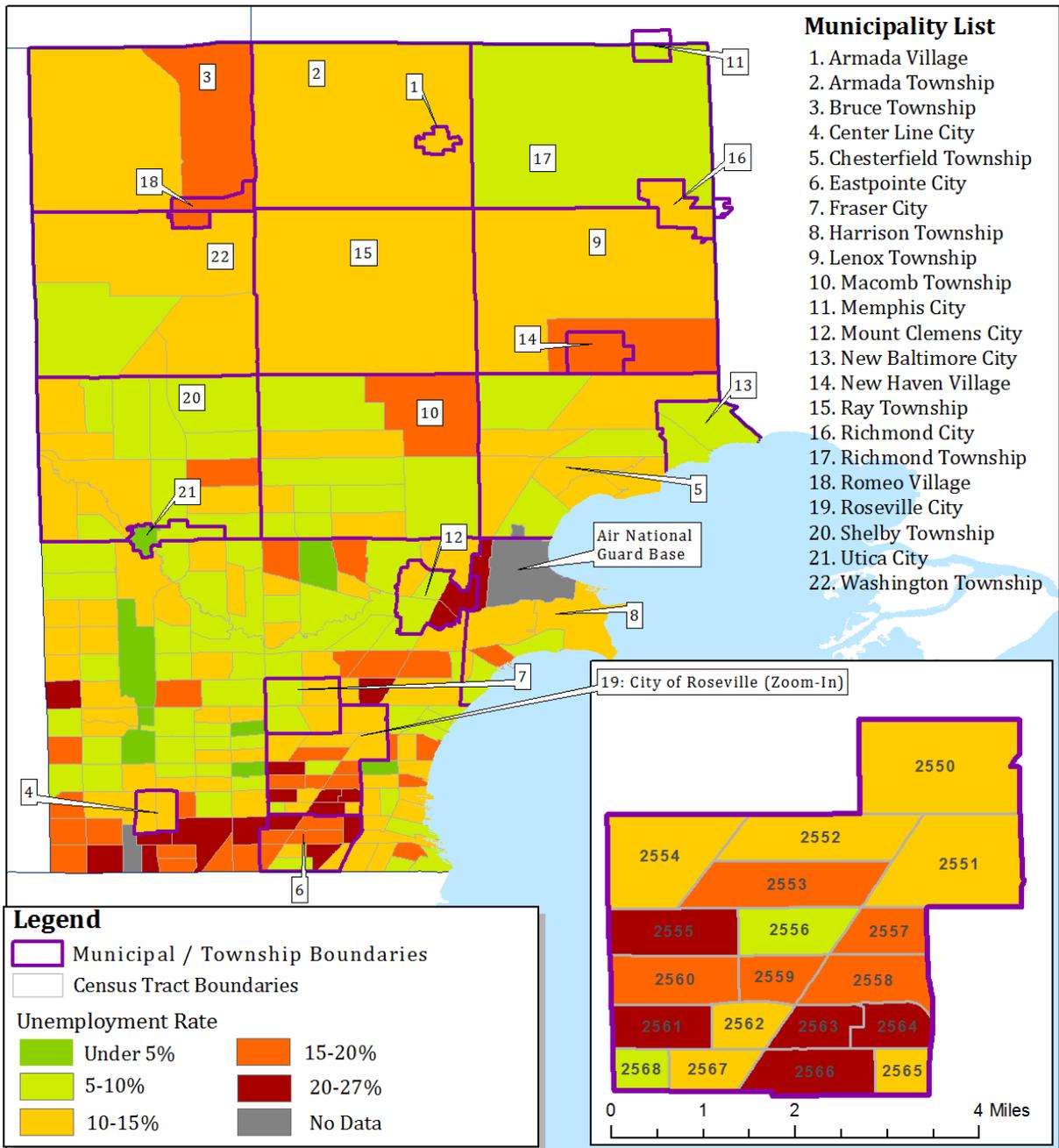
Source: U.S. Census Bureau, 2008- 2010 American Community Survey

As of the 2010 ACS, Roseville’s population aged 16 years and over numbered 38,414 persons, of which approximately 66% (25,216 persons) was in the labor force. In Roseville, 54% of the population aged 16 and over were employed, 12% were unemployed, and 34% were not currently in the labor force. Eighty-three percent of the people employed were private wage and salary workers; 12% were federal, state, or local government workers; and 6% were self-employed in their own (not incorporated) business.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Map 11

Macomb County: Unemployment Rate Averages from 2006-2010



Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Table 6

City of Roseville Worker Description	Number	Percent
Private wage and salary workers	17,108	82.7
Federal, state, or local government workers	2,411	11.6
Self-employed workers in own not incorporated business	1,180	5.7

Source: U.S. Census Bureau, 2008- 2010 American Community Survey

Macomb County has job opportunities in a fairly diversified economy, and is reflected in the major industries of employment. According to the 2010 American Community Survey, the top three industries provide employment for over one-half of the workforce:

Education, Healthcare, and Social Assistance	78,861 (21.4%)
Manufacturing	69,927 (19.0%)
Retail Trade	47,909 (13.0%)

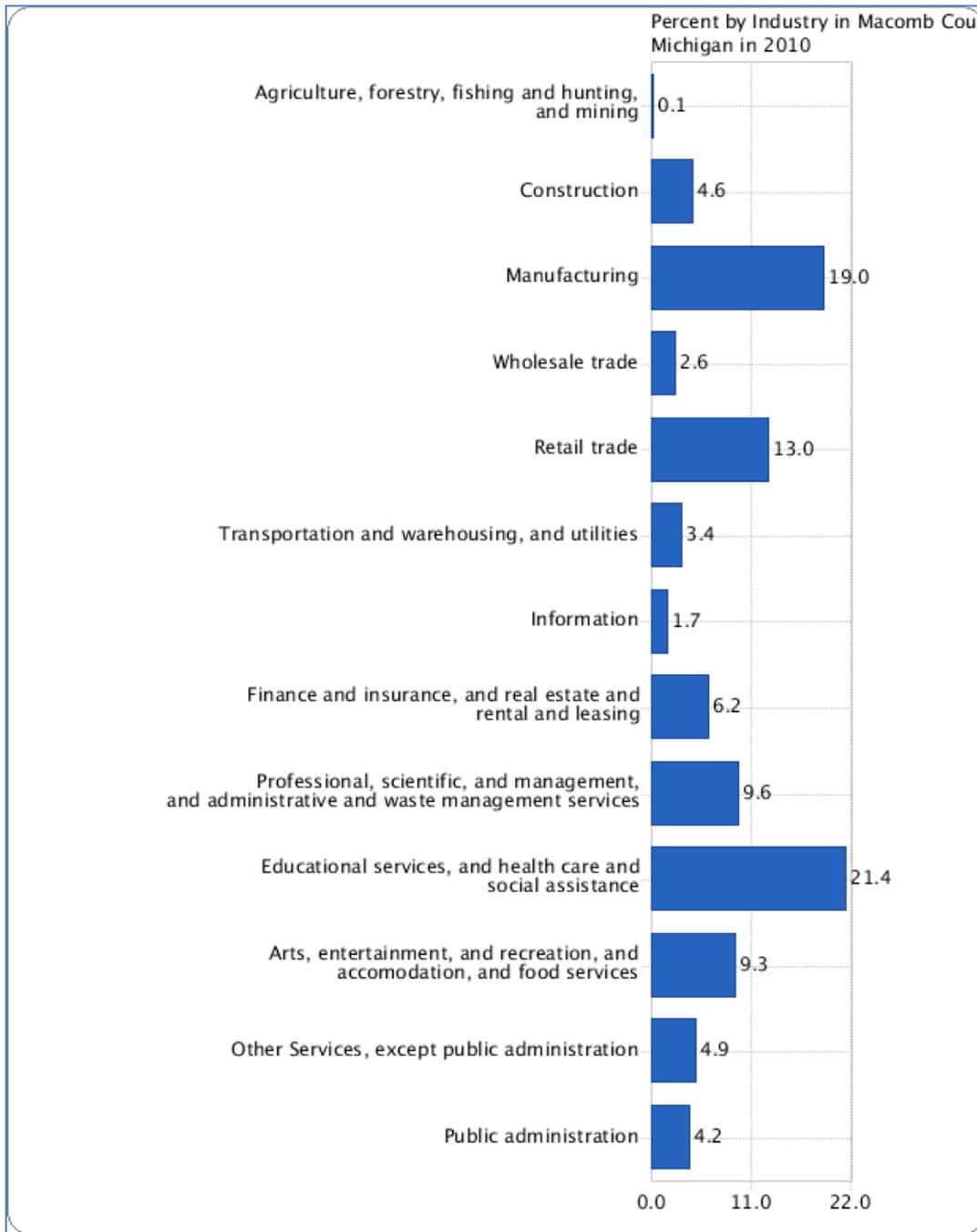
Similarly, the City of Roseville ACS data shows the following top three employment industries:

Education, Healthcare, and Social Assistance	4,604 (22.2%)
Manufacturing	4,083 (19.7%)
Retail Trade	3,215 (15.5%)

A further breakdown of the various employment industries in Macomb County can be found by looking at the 2010 ACS data, as contained in the following chart.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Figure 8



Source: U.S. Census Bureau, 2008- 2010 American Community Survey

Occupations for the (civilian) employed population 16 years and over in Macomb County is varied, as well. The ACS for 2010 shows the following occupations for citizens of Macomb County and the City of Roseville.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Table 7

Civilian employed population 16 years and over (Macomb County)	Number	Percent
Management, business, science, and arts occupations	120,977	32.8
Service occupations	65,615	17.8
Sales and office occupations	105,299	28.6
Natural resources, construction, and maintenance occupations	26,606	7.2
Production, transportation, and material moving occupations	50,233	13.6

Source: U.S. Census Bureau, 2008- 2010 American Community Survey

Table 8

Civilian employed population 16 years and over (City of Roseville)	Number	Percent
Management, business, science, and arts occupations	4,591	22.2
Service occupations	4,283	20.7
Sales and office occupations	6,315	30.5
Natural resources, construction, and maintenance occupations	1,999	9.7
Production, transportation, and material moving occupations	3,511	17.0

Source: U.S. Census Bureau, 2008- 2010 American Community Survey

Table 9 - Macomb County Major Employers, 2010

Business Name	Number of Full-Time Employees	Type of Business
Chrysler, LLC	7,237	Auto Manufacturer
TACOM	6,900	U.S. Department of Defense
General Motors	5,349	Auto Manufacturer
St. John Health System	3,891	Health Care
Utica Community Schools	3,323	Education
General Dynamics Land Systems Div.	2,700	Armored Military Vehicles Manufacturer
Ford Motor Company	2,500	Auto Manufacturer
Henry Ford Health System	2,433	Health Care
Macomb County Government	2,310	County Government
Chippewa Valley Schools	1,750	Education
Warren Consolidated	1,431	Education
Mount Clemens Regional Medical Center	1,244	Health Care

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Business Name	Number of Full-Time Employees	Type of Business
Campbell-Ewald	1,000	Advertising Agency
CenTra Inc.	1,000	Trucking – Motor Freight
Asset Acceptance Capital Corporation	802	Finance
E I Du Pont Nemours	800	Automotive Paint Manufacturer
AZ Automotive Corporation	729	Automotive Parts Supplier
Art Van Furniture	725	Retail Home Furnishings
Macomb Community College	694	Education
JCI/Bridgewater Interiors, LLC	620	Automotive Parts Supplier
US Manufacturing Corporation	600	Automotive Parts Supplier
Utica Enterprises Machine	475	Tools Manufacturer
Continental Plastics	400	Automotive Parts Supplier
Fisher & Co.	400	Automotive Parts Supplier
MNP Corporation	400	Automotive Fasteners

Source: Crain's Detroit Business; Harris Michigan Industrial Directory database; Macomb County Department of Planning and Economic Development; Michigan Economic Development Corporation (MEDC); Reference USA Gov. database as prepared by the Macomb County Department of Planning and Economic Development

Transportation and Commuting

Transportation

The Road Commission of Macomb County (RCMC) is the road agency in Macomb County. RCMC maintains more than 1,700 miles of road with more than 900 traffic signals and 60,000 signs. County Road Commissions are responsible for the public road system (except State highways) outside incorporated cities and villages. In many counties, including Macomb, certain primary roads in Cities are under County jurisdiction. These roads are continuous throughout a County and are usually made contiguous with adjoining counties. The RCMC's primary source of funding is the Michigan Transportation Fund. This fund is supported by the state fuel tax and vehicle registration fees. RCMC's allocation is based on a formula, which includes factors such as population, miles of certified road and vehicle registration fees.

All communities in Macomb County are serviced by SMART (Suburban Mobility Authority for Regional Transportation) bus system. Nearly 200,000 people ride SMART buses every week. A total of 54 routes, with 7000 stops, connect Macomb County to its neighbors in the Detroit region. SMART offers fixed route service, connector service, ADA service, and additional bus services.

- Connector Service is a curb-to-curb service, geared towards seniors and people with disabilities, allowing riders to travel anywhere within designated service areas.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

- ADA Service is available for people with disabilities. SMART offers paratransit door-to-door services for ADA customers who are unable to access regular Fixed Routes. ADA certification is required to use this service.
- Additional bus services are available to connect people in areas where there is limited or no access to fixed route services. These services include: Flex Routes, Shuttles and Dial-A-Ride.

In June 2011, the Macomb County Board of Commissioners voted to support the creation of a regional transit authority, in partnership with the City of Detroit, Wayne County, Washtenaw County, and Oakland County. In early 2012, the Michigan legislature introduced legislation establishing the Southeast Michigan Regional Transit Authority and its 10-member board. At the time of publication of this document, the status of transit authority legislation was still pending.

The Macomb County Community Services Agency (MCCSA) Transportation program provides transportation to essential medical appointments and other specific locations for eligible Macomb County residents. Services are also provided in coordination with MCCSA's other programs such as Head Start and Meals on Wheels. MCCSA has vehicles designed to accommodate people who use wheelchairs. Hydraulic lifts allow frail or physically challenged people to be transported in their wheelchairs. Individuals interested in MCCSA transportation services must meet program eligibility guidelines.

- Be a Macomb County resident.
- Meet Community Services Block Grant income guidelines.
- Complete an application for service.
- Have a documented need for medical treatments.
- No access to public transportation (SMART or municipal services).
- Do not live with someone who owns and drives a vehicle.
- A caregiver must assist any rider who is unable to meet the vehicle curbside without assistance.

Commuting

According to the 2010 American Community Survey, a significant majority of Macomb County residents (87%) commute alone to work via automobile, truck, or van. Of all auto commuters, 8% do so via carpooling. The use of other forms of commuting is very low, with less than 1% of commuters walking or using public transportation. Of employed persons aged 16 and over, 2% work at home.

Comparatively, a large percentage of Roseville residents (85%) commute alone to work via automobile, truck, or van. Of all commuters, 9% do so via carpooling. The use of other forms of commuting is slightly higher than Macomb County, with 1% using public transportation, and just over 1% walking to work. Of employed persons aged 16 and over, 2% work at home.

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The average travel time to work for Macomb County commuters is 26 minutes, according to the 2010 American Community Survey. This varies for the municipalities within Macomb County, as the following table shows:

Table 10 – Travel Time to Work – Macomb County

Municipality	Mean Travel Time to Work (minutes)
Armada (Village)	33.1
Armada Township	33.1
Bruce Township	27.4
Center Line	19.7
Chesterfield Township	29.7
Clinton Township	25.3
Eastpointe	23.0
Fraser	23.5
Harrison Township	27.2
Lenox Township	26.6
Macomb Township	31.5
Memphis	33.2
Mount Clemens	23.4
New Baltimore	30.3
New Haven	27.1
Ray Township	28.7
Richmond (City)	30.8
Richmond Township	32.6
Romeo	26.4
Roseville	24.6
Shelby Township	28.6
Utica	24.2
Washington Township	27.7

Source: U.S. Census Bureau, 2010 American Community Survey

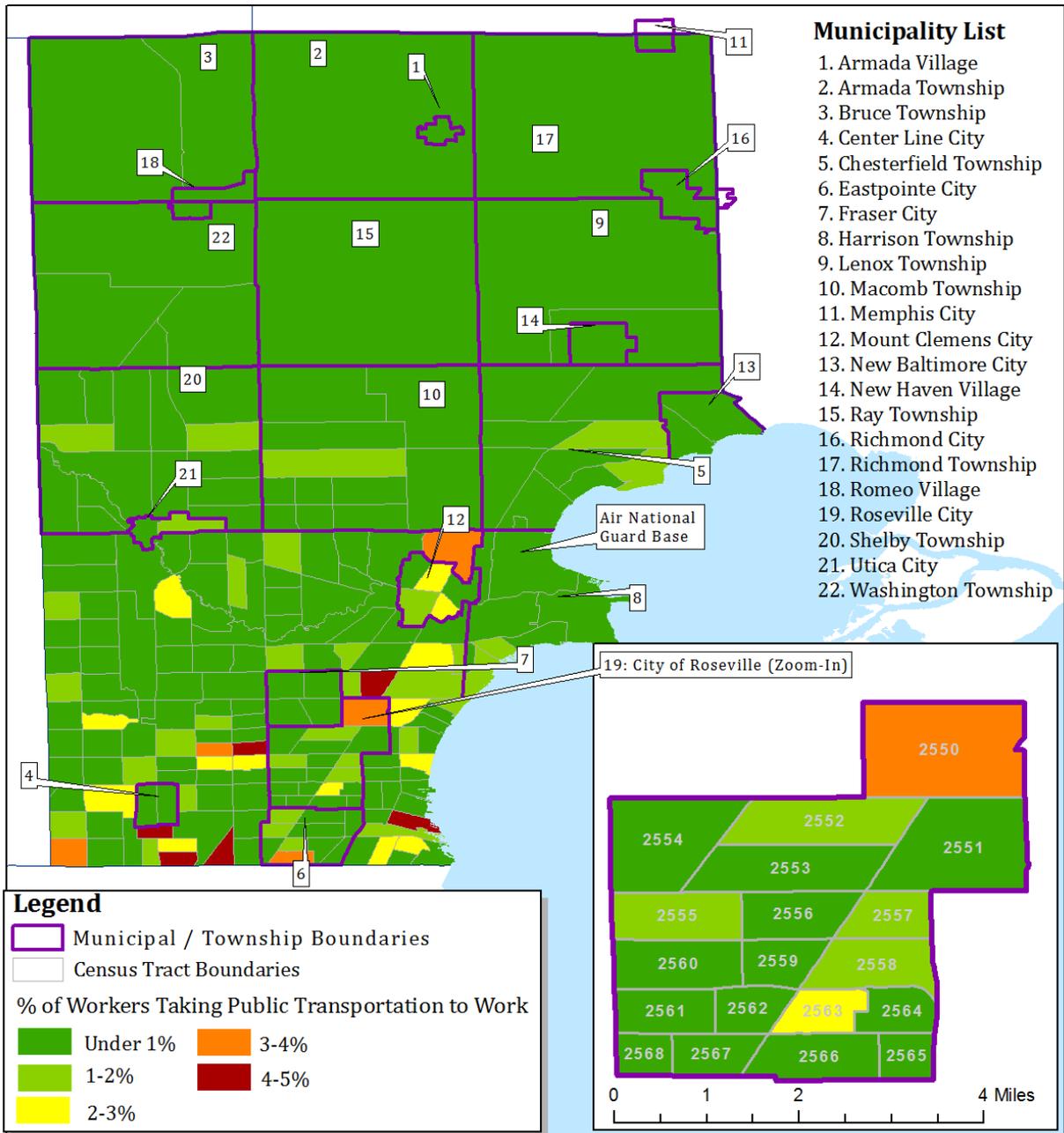
A network of 166 miles of freeways and 2,942 miles of primary roads provide multiple access routes for Macomb County businesses and residents. Two interstates, I-94 and I-696, connect Macomb to the rest of the state, nation, and Canada. Access to a third interstate, I-75, is provided by connecting routes on I-696 and M-59. A grid system of “mile roads” traverses the county from east to west, intersected by multiple arterial roads and freeways.

The I-94 expressway winds through southeast Macomb, and continues north through St. Clair County to the Blue Water Bridge to Canada, a major international border crossing for both truck and rail. Heading south, I-94 connects Macomb with the city of Detroit and the Detroit-Metro Airport.

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Map 12

Macomb County: Percent of Workers Taking Public Transportation to Work Averages from 2006-2010



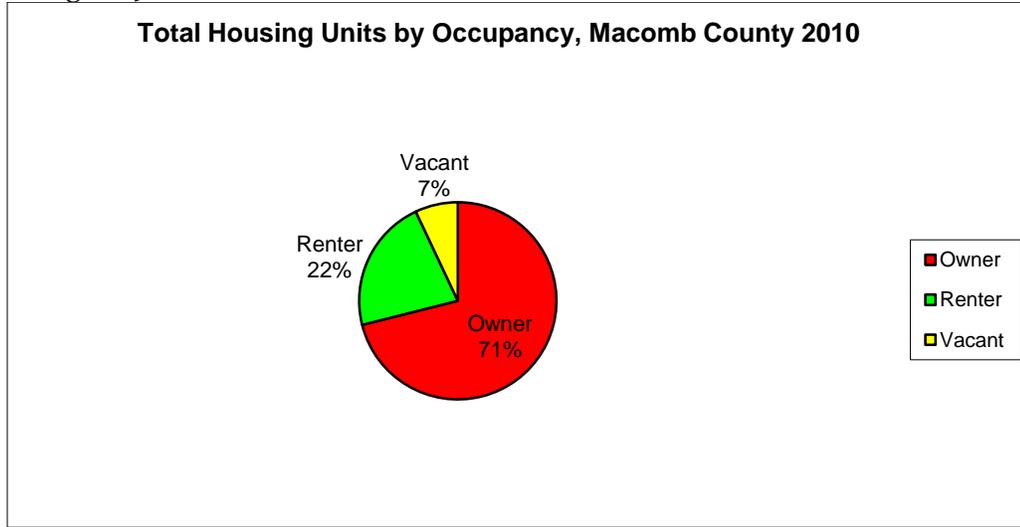
Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

III. HOUSING PROFILE

Housing by Tenure

In 2010, Macomb County had a total of 356,626 housing units, 93% (331,667) occupied and 7% (24,959) of which were vacant. The number of housing units reflects an increase from 2000, when Macomb County had a total of 320,276 units.

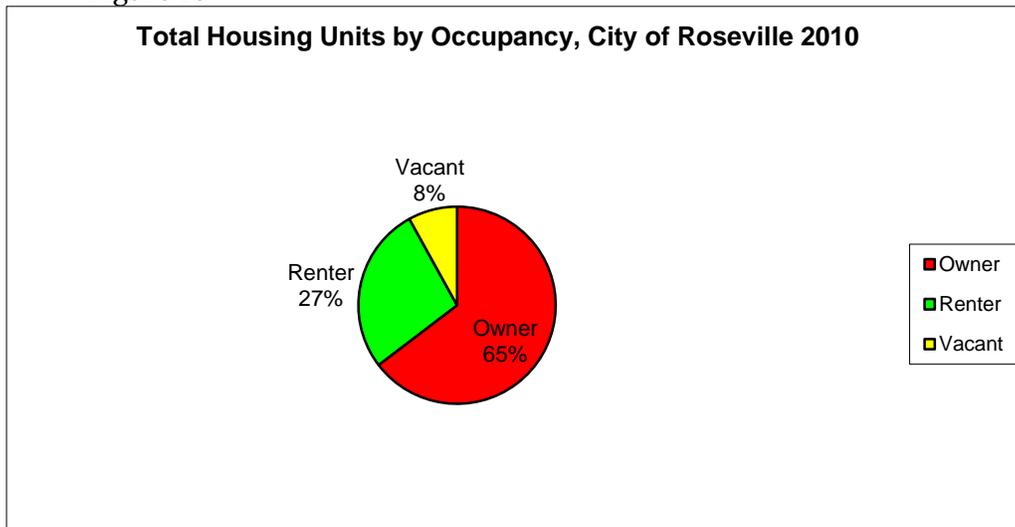
Figure 9



Source: U.S. Census Bureau, 2010

In the City of Roseville, there were 21,260 total housing units reported in the 2010 Census. Of those units, 92% (19,553) were occupied and 8% (1,707) were vacant.

Figure 10

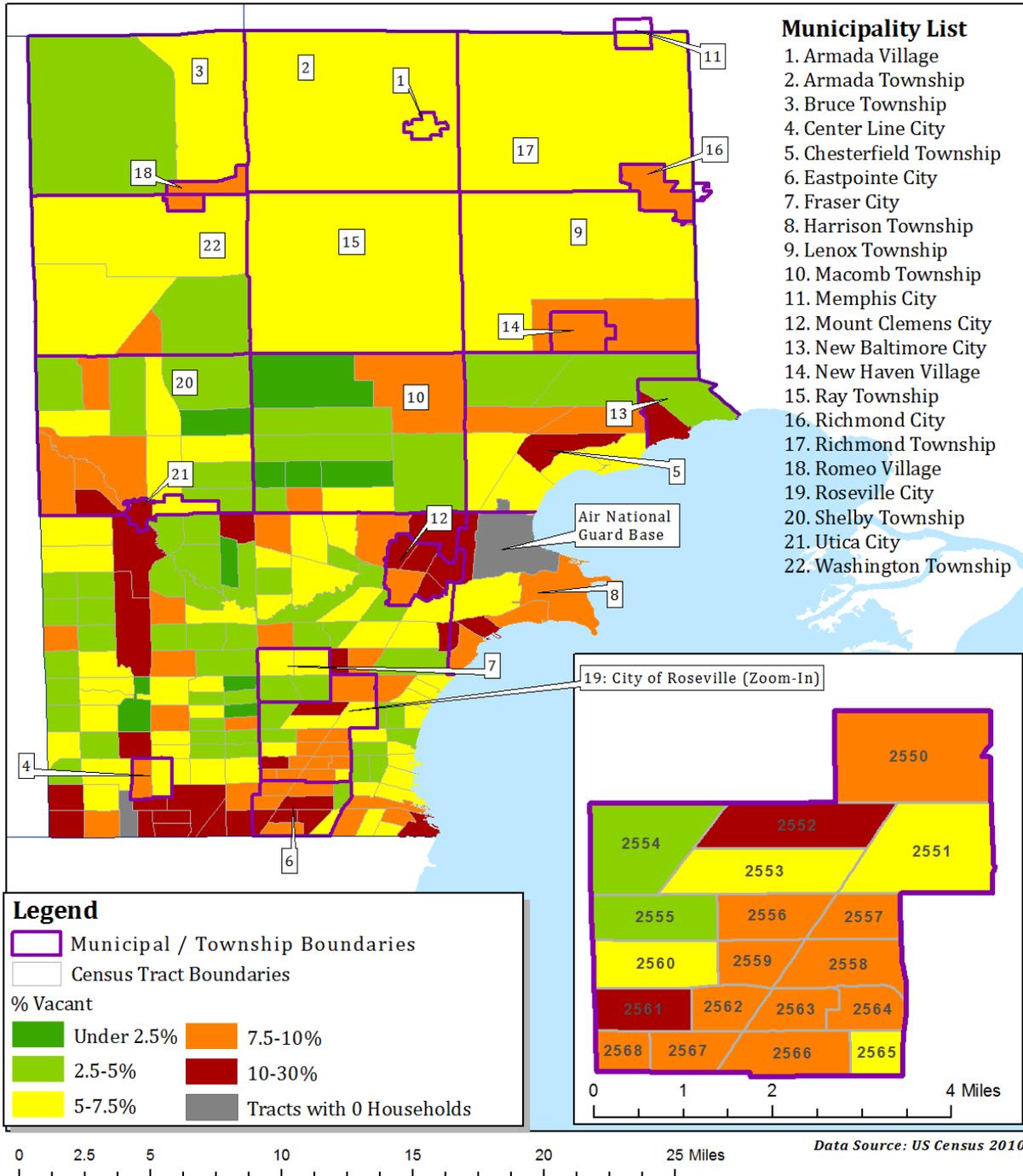


Source: U.S. Census Bureau, 2010

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Map 13

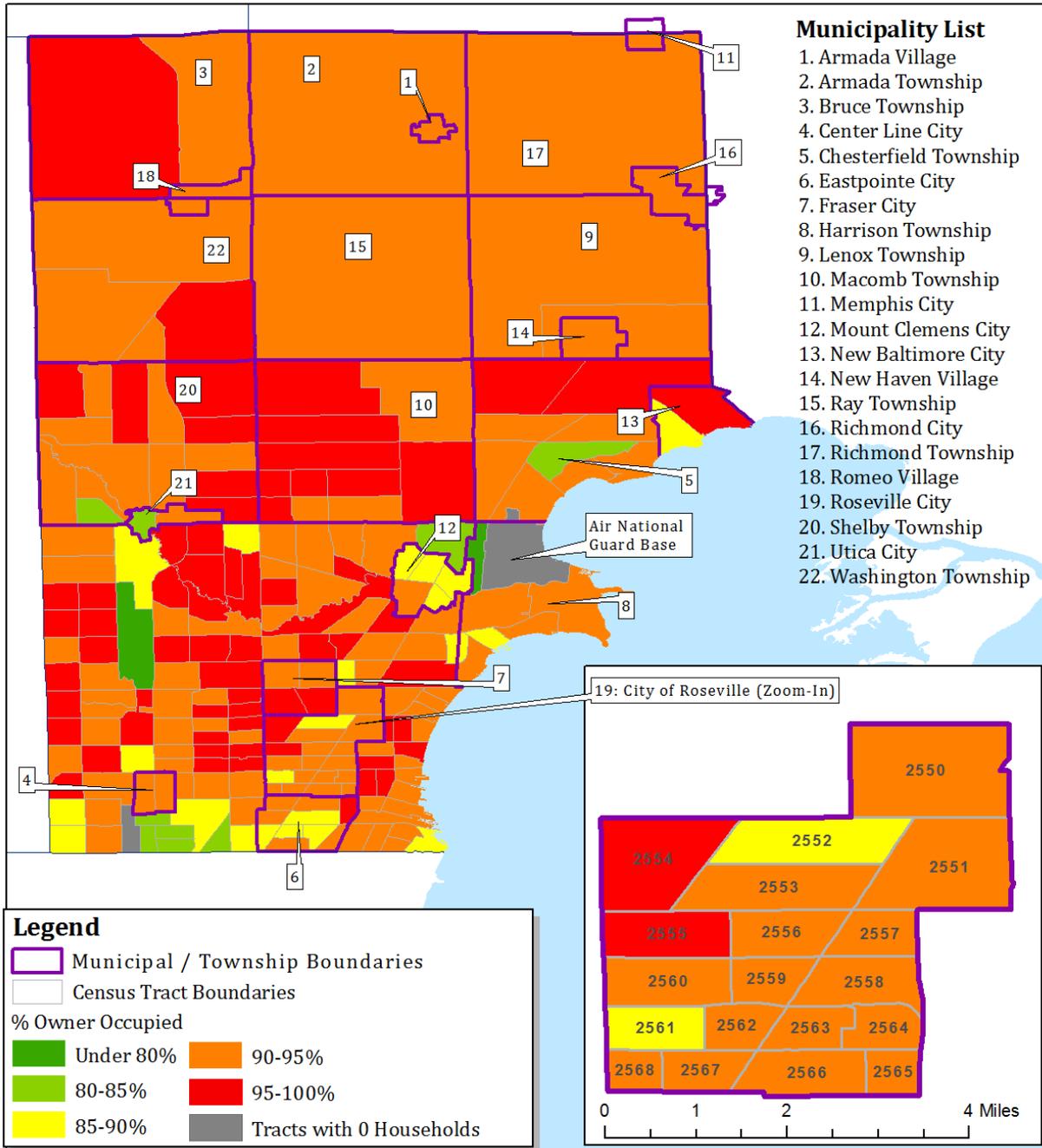
Macomb County: Percent Vacant Housing in 2010



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Map 14

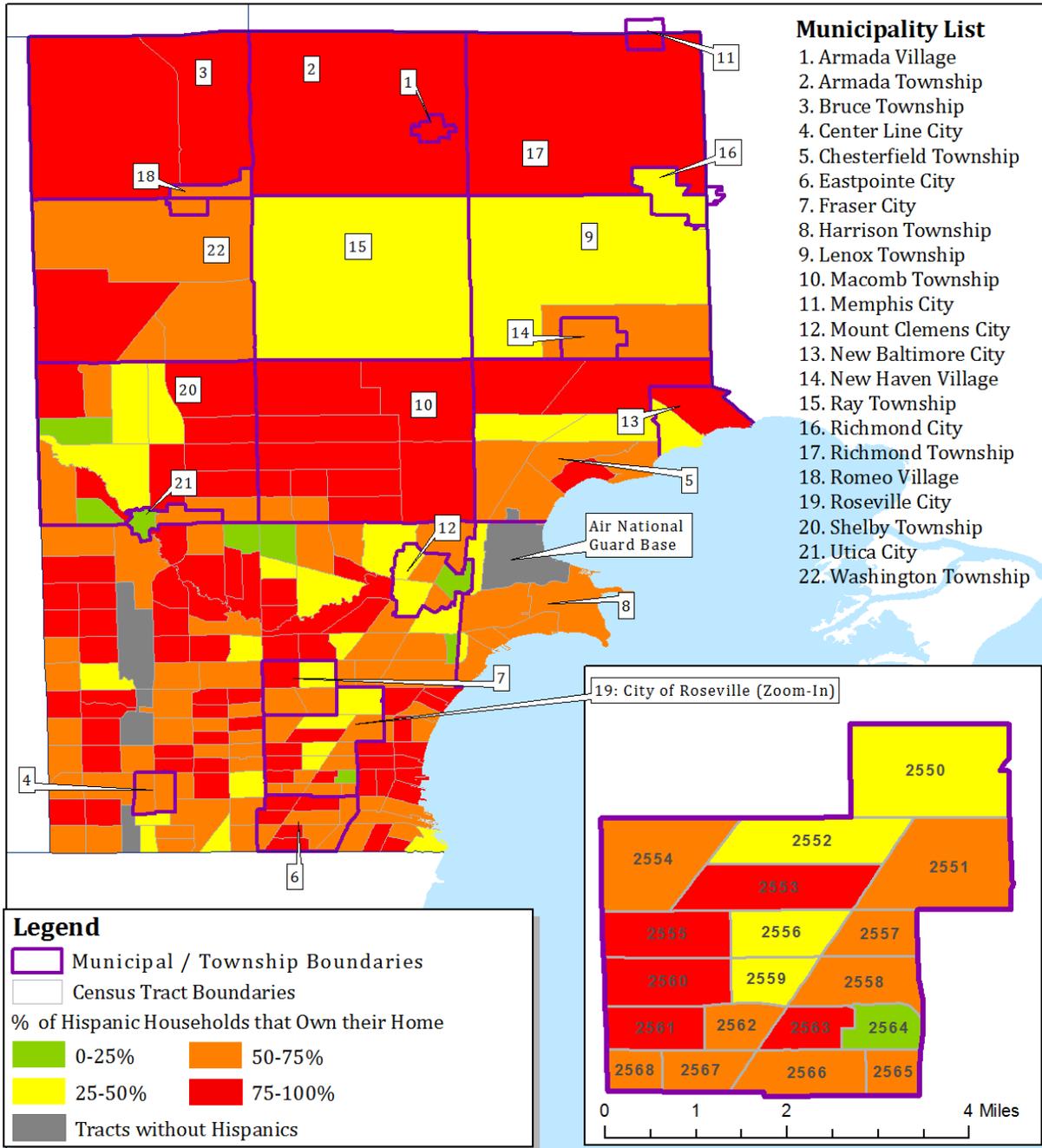
Macomb County: Percent Owner Occupied Housing in 2010



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Map 15

Macomb County: Percent of Hispanic Households that Own their Home in 2010



Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Map 16

Macomb County: Percent of African American Households that Own their Home in 2010

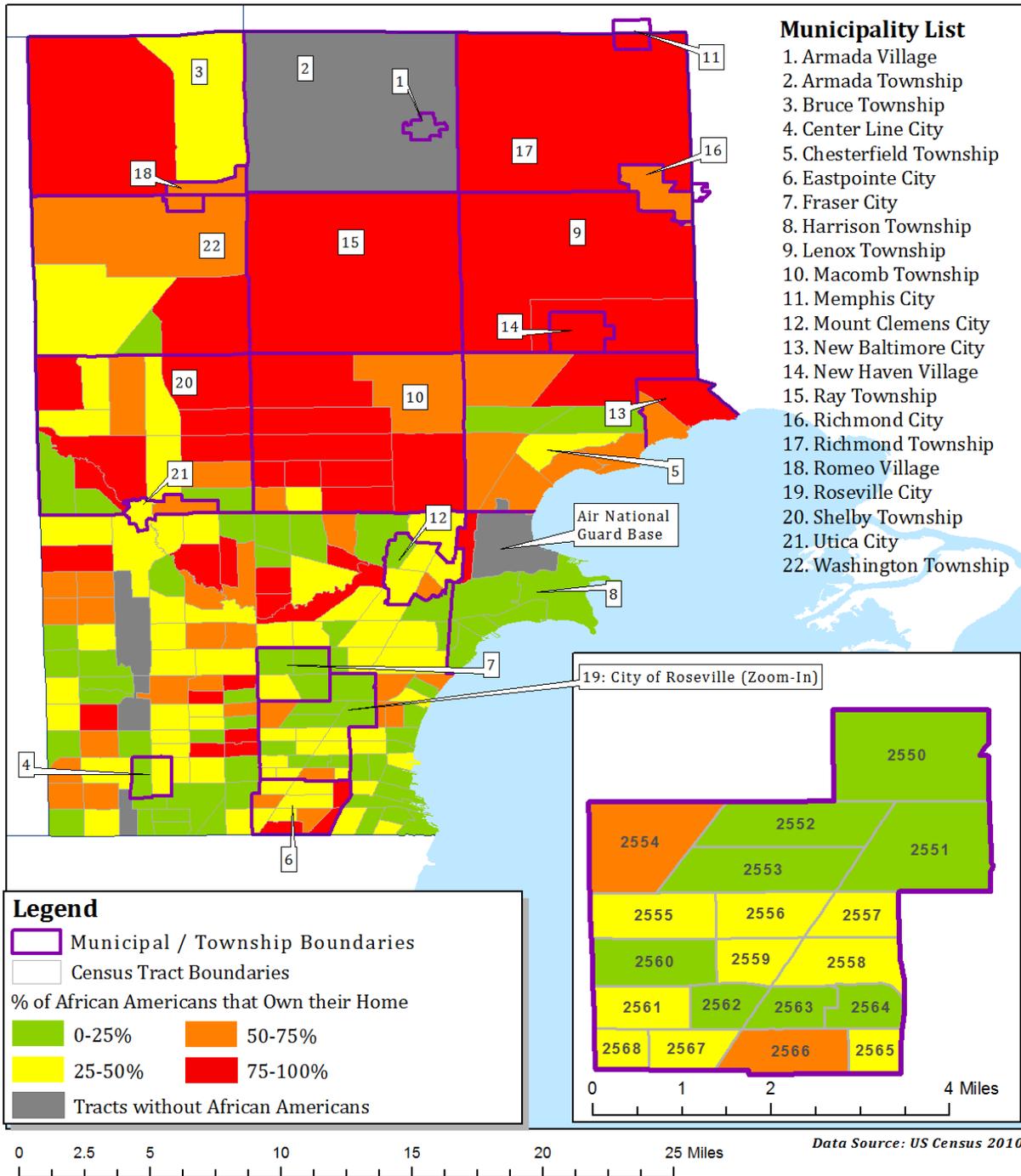
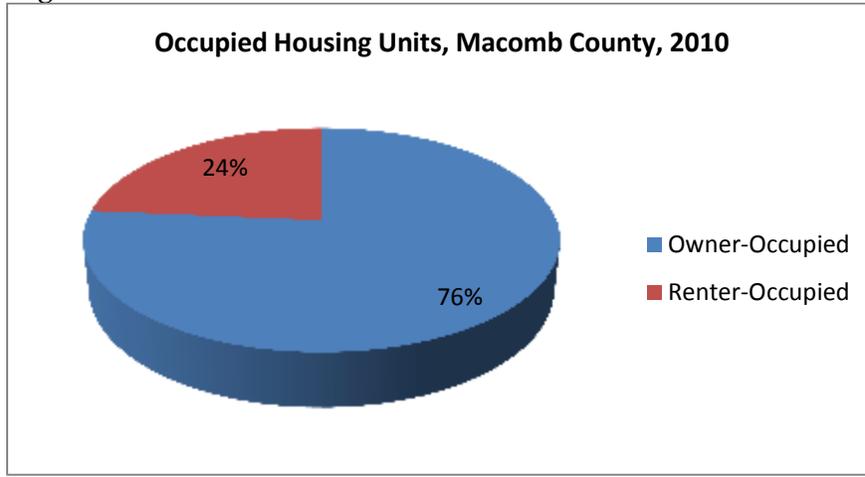


Figure 11 on the following page shows that of the 331,667 occupied (non-vacant) Macomb County housing units in 2010, approximately 76% (253,468) were owner occupied and 24% (78,199) were renter occupied.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

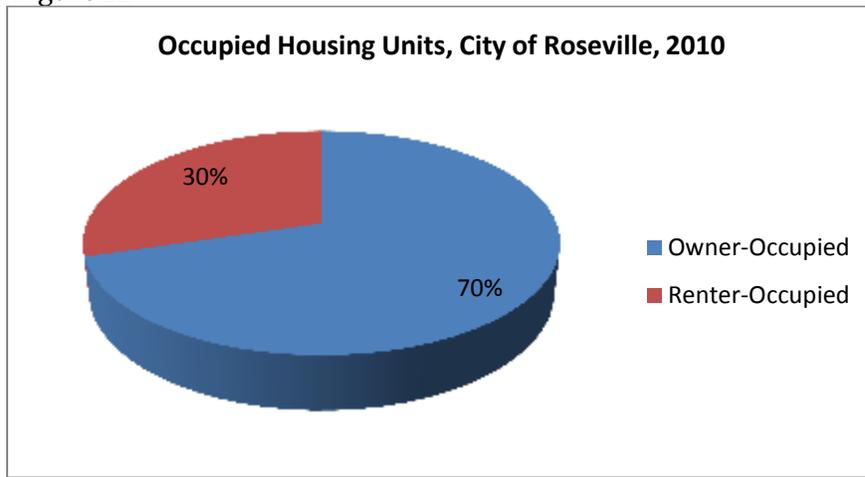
Figure 11



Source: U.S. Census Bureau, American Community Survey, 2010

In Roseville, there were 19,553 occupied housing units in 2010. Approximately 70% (13,741) were owner occupied and 30% renter occupied.

Figure 12



Source: U.S. Census Bureau, American Community Survey, 2010

The 2010 American Community Survey gives a break-out of the types of units in the Macomb County housing stock, as well as the year structures were built.

Table 11- Housing Unit Types, Macomb County, 2010

Total/Type Housing Units	Number of Units	Percentage
1-Unit, Detached	241,960	67.9%
1-Unit, Attached	37,234	10.4%
2 Units	4,057	1.1%
3 or 4 Units	8,402	2.4%
5 to 9 Units	22,161	6.2%
10 to 19 Units	13,666	3.8%
20 or More Units	16,901	4.7%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Mobile Home	12,203	3.4%
Boat, RV, Van, etc.	0	0%

Source: 2010 American Community Survey

Table 12 - Year Structure Built, Macomb County, 2010

Year Structure Built	Number of Units	Percentage
Built 2005 or later	12,242	3.4%
Built 2000 to 2004	32,592	9.1%
Built 1990 to 1999	48,387	13.6%
Built 1980 to 1989	42,785	12.0%
Built 1970 to 1979	61,971	17.4%
Built 1960 to 1969	53,308	16.4%
Built 1950 to 1959	67,476	18.9%
Built 1940 to 1949	17,472	4.9%
Built 1939 or earlier	15,351	4.3%

Source: 2010 American Community Survey

The predominant type of housing in Macomb County is the single-unit, detached structure (68%), followed by single-unit attached structures (10%) and structures with 5 to 9 units (6%). The housing stock is considered to be fairly aged, with almost three-quarters (74%) of structures being built prior to 1990, and almost all (97%) being built prior to 2005.

Table 13-Housing Unit Types, City of Roseville, 2010

Total/Type Housing Units	Number of Units	Percentage
1-Unit, Detached	16,481	74.7%
1-Unit, Attached	1,663	7.5%
2 Units	382	1.7%
3 or 4 Units	628	2.8%
5 to 9 Units	1,512	6.9%
10 to 19 Units	403	1.8%
20 or More Units	813	3.7%
Mobile Home	176	0.8%
Boat, RV, Van, etc.	0	0%

Source: 2010 American Community Survey

Table 14 -Year Structure Built, City of Roseville, 2010

Year Structure Built	Number of Units	Percentage
Built 2005 or later	91	0.4%
Built 2000 to 2004	558	2.5%
Built 1990 to 1999	1,028	4.7%
Built 1980 to 1989	1,900	8.6%
Built 1970 to 1979	3,415	15.5%
Built 1960 to 1969	3,548	16.1%
Built 1950 to 1959	8,130	36.9%
Built 1940 to 1949	1,852	8.4%
Built 1939 or earlier	1,536	7.0%

Source: 2010 American Community Survey

In the City of Roseville, the type of housing follows the same pattern as Macomb County with the single-unit, detached structure being predominant (75%), followed by single-unit attached

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

structures (8%) and structures with 5 to 9 units (7%). The housing stock is considered to be aged with more than three-quarters (84%) of structures being built prior to 1980, and almost all (97%) being built prior to 2005.

Housing Affordability

Community Housing Affordability Study (CHAS)

HUD's Community Housing Affordability Study (CHAS) is a commonly-used gauge of housing affordability, or lack thereof. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction.

MACOMB COUNTY

Percentage of Owners with Severe Housing Cost Burdens

According to 2005-2009 American Community Survey, Comprehensive Affordability Study (CHAS) data, approximately 69 percent (12,195) of owner households whose incomes are 30 percent or less of the area median income are severely cost burdened; 31.03 percent (7,453) whose incomes are at 30.1 to 50 percent of the area median income are severely cost burdened; and approximately 14 percent (5,950) whose incomes are 50.1 to 80 percent of the area median income are severely cost burdened.

Very low income owners, those whose incomes are at 30 percent or less of the area median income, have the highest percentage of owners experiencing severe housing cost burdens. Low income owners, those whose incomes are 30.1 to 50 percent of the area median, have the second highest percentage of owners experiencing severe housing cost burdens; however the percentage is 38 percent less than very low income owners. The percentage of moderate income owners, those with incomes of 50.1 to 80 percent of the area median income, who experience severe housing cost burdens are 55 percent less than very low income owners and 17 percent less than lower income owners.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Table 15 - Macomb County - Owners with Severe Housing Cost Burdens

Percentage of AMI	Total Number of Owners with Housing Cost Burdens	Total Number of Owners with Severe Housing Cost Burdens	Percentage of Owners with Severe Housing Cost Burdens
30% of AMI or Less	17,750	12,195	69%
30.1 - 50.0% of AMI	23,960	7,435	31.03%
50.1 - 80% of AMI	43,565	5,950	14%.

Percentage of Renters with Severe Housing Cost Burdens

According to the same data, 60.14 percent (9,990) of renter households whose incomes are 30 percent or less of the area median income are severely cost burdened; approximately 22 percent (2,595) with incomes of 30.1 to 50 percent of the area median income are severely cost burdened; and approximately 4 percent (580) of owners, with incomes of 50.1 to 80 percent of the area median income are severely cost burdened.

Very low income owners, those whose incomes are at 30 percent or less of the area median income, have the highest percentage of owners experiencing severe housing cost burdens. Low income owners, those whose incomes are 30.1 to 50 percent of the area median, have the second highest percentage of owners experiencing severe housing cost burdens; however the percentage is 38 percent less than very low income owners. The percentage of moderate income owners, those with incomes of 50.1 to 80 percent of the area median income, who experience severe housing cost burdens are 55 percent less than for very low income owners and 17 percent less than the lower income owners.

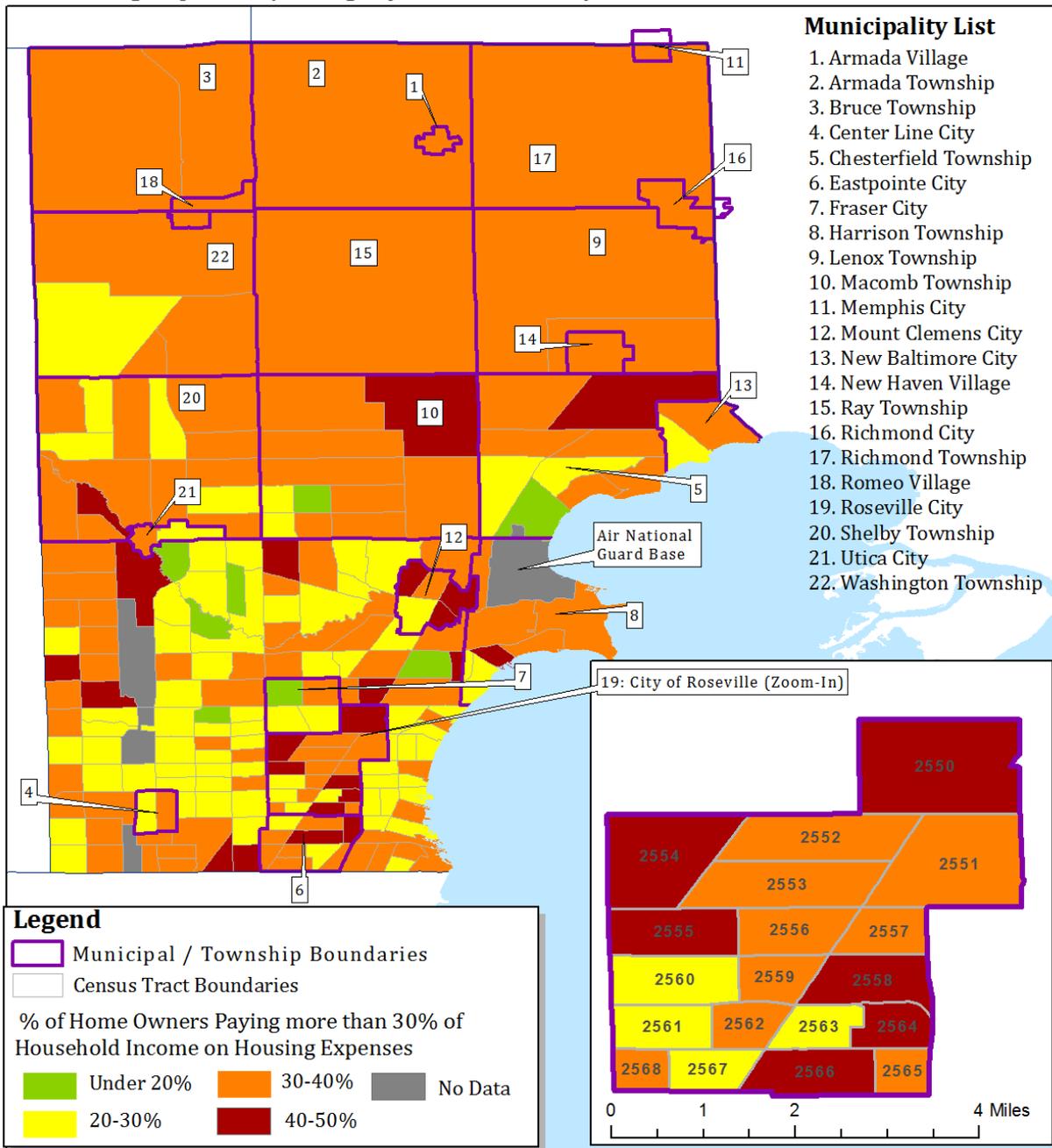
Table 16- Macomb County Renters with Severe Housing Cost Burdens

Percentage of AMI	Total Number of Renters with Housing Cost Burdens	Total Number of Renters with Severe Housing Cost Burdens	Percentage of Renters with Severe Housing Cost Burdens
30% of AMI or Less	16,610	9,990	60.14%
30.1 to 50.% of AMI	12,100	2,595	22%
50.1 to 80% of AMI	15,220	580	4%

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Map 17

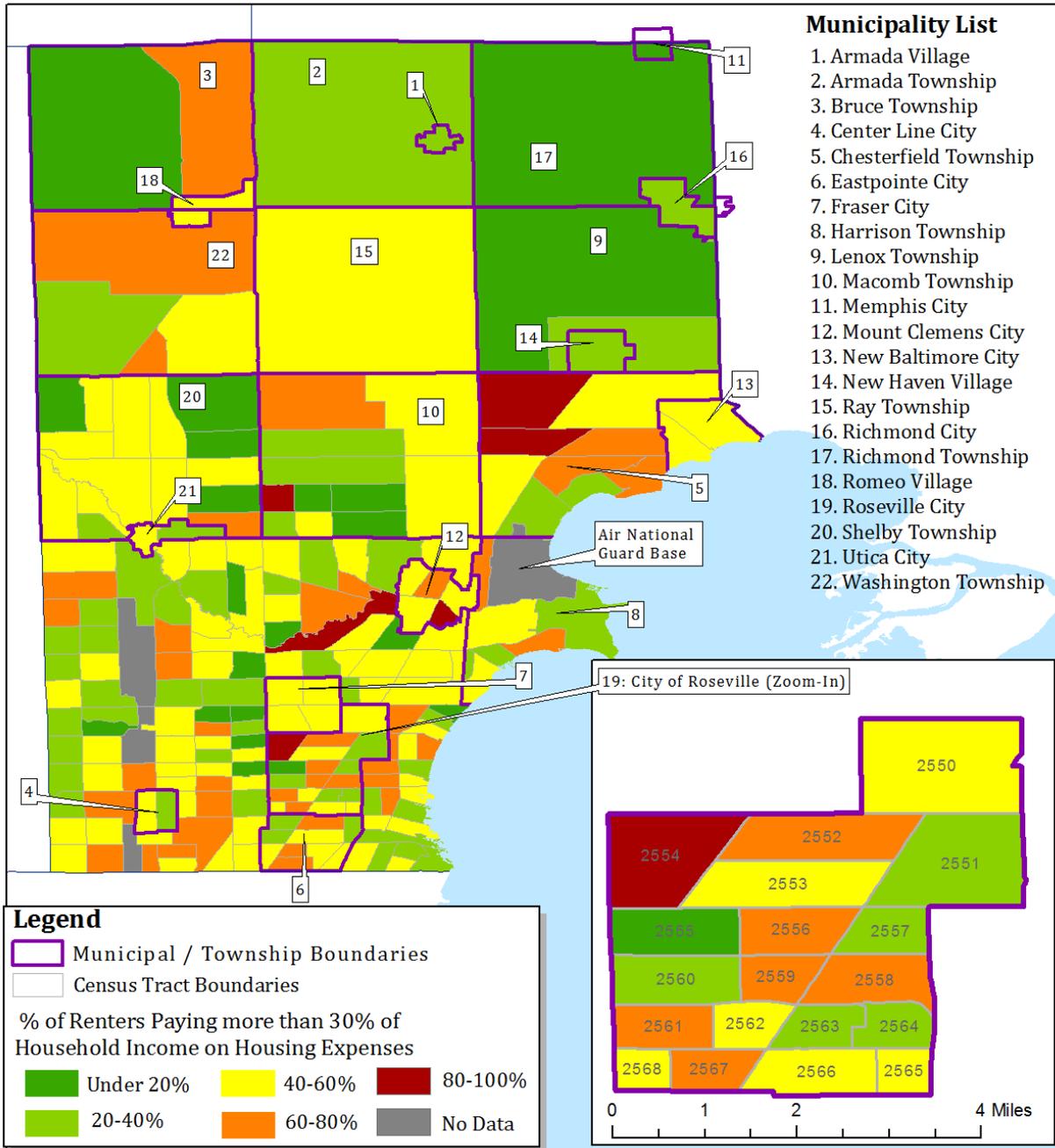
Macomb County: Percent of Home Owners Paying more than 30% of Household Income on Housing Expenses (Averages from 2006-2010)



Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Map 18

Macomb County: Percent of Renters Paying more than 30% of Household Income on Housing Expenses (Averages from 2006-2010)



Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

City of Roseville

Percentage of Owners with Severe Housing Cost Burdens

According to 2005-2009 American Community Survey Census data, 58.27 percent (775) of owner households whose incomes are 30 percent or less of the area median income are severely cost burdened; 28.13 percent (550) whose incomes are at 30.1 to 50 percent of the area median income are severely cost burdened; and 9.15 percent (295) whose incomes are 50.1 to 80 percent of the area median income are severely cost burdened.

Very low income owners, those whose incomes are at 30 percent or less of the area median income, have the highest percentage of owners experiencing severe housing cost burdens. Low income owners, those whose incomes are 30.1 to 50 percent of the area median, have the second highest percentage of owners experiencing severe housing cost burdens; however the percentage is 30.14 percent less than very low income owners. The percentage of moderate income owners, those with incomes of 50.1 to 80 percent of the area median income, who experience severe housing cost burdens, is 49.12 percent less than very low income owners and approximately 19 percent less than lower income owners.

Table 17 - Owners with Severe Housing Cost Burdens – City of Roseville

Percentage of AMI	Total Number of Owners with Housing Cost Burdens	Total Number of Owners with Severe Housing Cost Burdens	Percentage of Owners with Severe Housing Cost Burdens
30% of AMI or Less	1,330	775	58.27%
30.1 to 50.% of AMI	1,995	550	28.13%
50.1 to 80% of AMI	3,225	295	9.15%

Source: 2005-2009 American Community Survey

Percentage of Renters with Severe Housing Cost Burdens

According to the 2005-2009 American Community Survey data, approximately 72 percent (1,125) of renter households whose incomes are 30 percent or less of the area median income are severely cost burdened; approximately 31.06 percent (805) with incomes of 30.1 to 50 percent of the area median income are severely cost burdened; and approximately 7.08 percent (85) of owners, with incomes of 50.1 to 80 percent of the area median income are severely cost burdened.

Very low income owners, those whose incomes are at 30 percent or less of the area median income, have the highest percentage of owners experiencing severe housing cost burdens. Low

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income owners, those whose incomes are 30.1 to 50 percent of the area median, have the second highest percentage of owners with severe housing cost burdens; however the percentage is approximately 41 percent less than very low income owners. The percentage of moderate income owners, those with incomes of 50.1 to 80 percent of the area median income, who experience severe housing cost burdens, is 65 percent less than very low income owners and 24 percent less than the lower income owners.

Table 18: Renters with Severe Housing Cost Burdens – City of Roseville

Percentage of AMI	Total Number of Renters with Housing Cost Burdens	Total Number of Renters with Severe Housing Cost Burdens	Percentage of Renters with Severe Housing Cost Burdens
30% of AMI or Less	1,570	1,125	72%
30.1 to 50.% of AMI	805	250	31.06%
50.1 to 80% of AMI	1,200	85	7.08%

Source: 2005-2009 American Community Survey

Disproportionate Need – Macomb County

Information available from 2005-2009 American Community Survey, CHAS data was analyzed to identify the extent to which racial or ethnic groups may have disproportionately greater needs compared to the housing needs of all groups in Macomb County. The U.S. Department of Housing and Urban Development considers that a “disproportionately greater need exists when the percentage of persons in a category is at least 10 percentage points higher than the percentage of persons in a category as a whole.”

As illustrated in the tables below, when white households are used as the standard from which disproportion need is measured, the following conclusions can be drawn:

Black owner and renter households at all income levels are not disproportionately needy; and

Hispanic owner and renter households at all incomes are not disproportionately needy.

Generally, Blacks and Hispanics tend to be the ethnic and racial household groups that have disproportionate housing needs due to lower incomes, however in Macomb County, white owner and renter households is the group with the disproportionate need. The white owner and renter household’s greater disproportionate housing needs are probably due to the country’s ongoing economic and foreclosure crisis. Many households have lost their jobs and incomes resulting in greater housing problems.

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Table 19 - Macomb County Owners with Severe Housing Cost Burdens by Race

Race	Total Number of Owners	Total Number of Owners with Severe Housing Cost Burden	Percentage of Owners with Severe Housing Cost Burden
White	243,130	25,625	11%
Black	8,070	1,010	13%%
Asian	5,660	700	12.36%
American Indian	555	145	26.13%
Pacific Islander	40	0	0%
Hispanic	3,255	385	12%
Other	1,565	225	14.38%

Source: 2005-2009 American Community Survey

Table 20- Macomb County Renters with Severe Housing Cost Burdens by Race

Race	Total Number of Renters	Total Number of Renters with Severe Housing Cost Burden	Percentage of Renters with Severe Housing Cost Burden
White	48,710	9,805	20.13%
Black	10,850	2,610	24.06%
Asian	2,145	210	10%
American Indian	325	55	17%
Pacific Islander	70	0	0%
Hispanic	1,905	200	11%
Other	1,000	300	30%

Source: 2005-2009 American Community Survey

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Disproportionate Need – City Of Roseville

Information available from 2005-2009 American Community Survey, CHAS data was analyzed to identify the extent to which racial or ethnic groups may have disproportionately greater needs compared to the housing needs of all groups in the City of Roseville. The U.S. Department of Housing and Urban Development considers that a “disproportionately greater need exists when the percentage of persons in a category is at least 10 percentage points higher than the percentage of persons in a category as a whole.”

As illustrated in the tables below, when white households are used as the standard from which disproportion need is measured, the following conclusions can be drawn:

Black owner and renter households at all income levels are not disproportionately needy; and Hispanic owner and renter households at all incomes are not disproportionately needy.

Asian renter households have the highest percentage of disproportionate need at 64.29 percent; however the percentage is statistically insignificant, since Asian renters total only 70 with 45 having severe housing cost burden compared to a total white renter population of 3,600 with 1,110 with severe housing cost burden.

Blacks and Hispanics tend to be the ethnic and racial household groups that have disproportionate housing needs due to lower incomes, however in the City of Roseville, white owner and renter households is the group with the disproportionate need. The white owner and renter household’s greater disproportionate housing needs are probably due to the country’s ongoing economic and foreclosure crisis. Many households have lost their jobs and incomes resulting in greater housing problems.

Table 21- City of Roseville - Owners with Severe Housing Cost Burdens by Race

Race	Total Number of Owners	Total Number of Owners Severe Housing Cost Burden	Percentage of Owners with Severe Housing Cost Burden
White	13,485	1,595	12%
Black	165	4	2.42%
Asian	240	20	8.33%
American Indian	0	0	0%
Pacific Islander	0	0	0%
Other	145	10	7%

Source: 2005-2009 American Community Survey

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Table 22 - City of Roseville - Renters with Severe Housing Cost Burden by Race

Race	Total Number of Renters	Total Number of Renters with Severe Housing Cost Burden	Percentage of Renters with Severe Housing Cost Burden
White	3,600	1,110	31%
Black	1,155	305	26.41%
Asian	70	45	64.29%
American Indian	0	0	0%
Pacific Islander	0	0	0%
Hispanic	85	0	0%
Other	90	0	0%

Source: 2005-2009 American Community Survey

The following table below shows the cost burden for owner occupied households in Macomb County by City. Between 3% and 10% of the total owner occupied units in the County were cost burdened.

Table 23 - Cost-Burden of Owners by City within Macomb County

Macomb County Community	Total Number of Owner Occupied Housing Units	Owner Households with Housing Costs of 30% or > & Incomes < \$20,000	Owner Households with Housing Costs of 30% or more and Incomes of \$20,000 to \$34,999	Owner households with Housing Costs of 30% or more and Incomes of \$35,000 to \$49,999	Owner Households with Housing Costs of 30% or more and Incomes of \$50,000 to \$74,999	Owner Households with Housing Costs of 30% or more and Incomes of \$75,000 or more
Armada Township	1,742	141 8%	93 5%	109 6%	149 9%	85 5%
Armada Village	510	47 9%	19 4%	46 9%	52 10%	13 3%
Bruce Township	2,782	202 7%	155 5%	117 4%	227 8%	253 9%
Center Line City	2,138	212 10%	196 9%	158 7%	88 4%	20 1%
Chesterfield Township	13,729	945 7%	1054 8%	729 5%	1,023 7%	592 4%
Eastpointe City	10,366	1,074 10%	925 9%	913 9%	599 6%	16 1%

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Macomb County Community	Total Number of Owner Occupied Housing Units	Owner Households with Housing Costs of 30% or > & Incomes < \$20,000	Owner Households with Housing Costs of 30% or more and Incomes of \$20,000 to \$34,999	Owner households with Housing Costs of 30% or more and Incomes of \$35,000 to \$49,999	Owner Households Housing Costs of 30% or more and Incomes of \$50,000 to \$74,999	Owner Households with Housing Costs of 30% or more and Incomes of \$75,000 or more
Fraser City	4,502	280 6%	219 5%	220 5%	329 7%	53 1%
Harrison Township	8,157	647 8%	526 6%	721 9%	337 5%	297 4%
Lenox Township	2,674	269 10%	175 7%	226 8%	203 8%	160 6%
Macomb Township	23,740	1,387 6%	1,155 5%	1,405 6%	1,833 8%	1,747 7%
Memphis City	222	27 12%	31 14%	13 6%	6 3%	0 0%
Mount Clemens City	4,080	565 14%	483 12%	267 7%	103 3%	79 2%
New Baltimore City	3,268	72 2%	169 5%	252 8%	198 6%	286 9%
New Haven Village	1,213	159 13%	65 5%	77 6%	124 10%	90 7%
Ray Township	1,270	140 11%	63 5%	74 6%	52 4%	66 5%
Richmond City	1,871	108 6%	105 6%	188 10%	154 8%	8 .04%
Richmond Township	1,098	76 7%	32 3%	66 6%	109 10%	73 7%
Romeo Village	1,141	105 7%	65 5%	31 2%	65 5%	80 6%
Shelby Township	22,527	1,649 7%	1,228 5%	1,207 5%	1,360 5%	1,661 6%
Utica City	1,290	99 7%	67 5%	106 8%	41 3%	13 1%
Washington Township	7,766	538 7%	494 6%	463 6%	480 6%	621 8%

Source: American Community Survey, US. Census Bureau (2008)

1. Fifty percent (50%) of estimated 2008 household median income by tenure for each jurisdiction.
2. Total and affordable renter units include both units with contract rent and units with no cash rent.

Housing Stock Available to Disabled Persons

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

The most recent data comprehensive data on disability status among Macomb County’s population was the U.S. Census 2010 American Community Survey. There are 105,654 people (12.7% of the total population) in Macomb County with a disability. The ACS data included the following breakdown of the disabled population by age group.

Table 24 - Disability Status of the Civilian Non-Institutionalized Population Macomb County, Michigan 2010

Population Status	Number	Percentage
Total Population With a Disability	834,036 105,654	100% 12.7%
Population Under 18 years With a Disability	193,246 7,330	5.1%
Population 18 to 64 years With a Disability	523,826 55,566	10.6%
Population 65 years and over With a Disability	116,964 42,758	36.6%

Source: American Community Survey, US. Census Bureau (2010)

There are 8,676 people (18.3% of the total population) in the City of Roseville with a disability. The ACS data included the following breakdown of the disabled population by age group. Each age group reflects a significantly higher disability rate than the County as a whole.

Table 25 - Disability Status of the Civilian Non-Institutionalized Population City of Roseville, Michigan 2010

Population Status	Number	Percentage
Total Population With a Disability	47,455 8,676	100% 18.3%
Population Under 18 years With a Disability	10,360 873	11.3%
Population 18 to 64 years With a Disability	30,543 4,785	15.7%
Population 65 years and over With a Disability	6,552 3,018	46.1%

Source: American Community Survey, US. Census Bureau (2010)

The 2010 American Community Survey also provides information regarding type of disabilities within the Macomb County and Roseville population, as well as the incidence of two or more disabilities within age groups.

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Table 26 - Disability Characteristics of the Macomb County Population, 2010

Population/ Characteristic	Total	# With a Disability	% With a Disability
Total Population	834,036	105,654	12.7%
Population under 5 years	48,686	50	0.1%
With a hearing difficulty		50	0.1%
With a vision difficulty		0	0%
Population 5 to 17 years	144,560	7,280	2.6%
With a hearing difficulty		766	0.5%
With a vision difficulty		882	0.6%
With a cognitive difficulty		5,902	4.1%
With an ambulatory difficulty		937	0.6%
With a self-care difficulty		919	0.6%
Population 18 to 64 years	523,826	55,566	10.6%
With a hearing difficulty		10,831	2.1%
With a vision difficulty		8,631	1.6%
With a cognitive difficulty		22,433	4.3%
With an ambulatory difficulty		28,816	5.5%
With a self-care difficulty		10,265	2.0%
With an independent living difficulty		19,973	3.8%
Population 65 years and over	116,964	42,758	36.6%
With a hearing difficulty		18,446	15.8%
With a vision difficulty		7,910	6.8%
With a cognitive difficulty		11,561	9.9%
With an ambulatory difficulty		27,784	23.8%
With a self-care difficulty		9,829	8.4%
With an independent living difficulty		20,081	17.2%

Source: American Community Survey, US. Census Bureau (2010)

Table 27 - Disability Characteristics of the City of Roseville Population, 2010

Population/ Characteristic	Total	# With a Disability	% With a Disability
Total Population	47,455	8,676	18.3%
Population under 5 years	2,647	0	0%
With a hearing difficulty		0	0%
With a vision difficulty		0	0%
Population 5 to 17 years	7,713	873	11.3%
With a hearing difficulty		113	1.5%
With a vision difficulty		63	0.8%
With a cognitive difficulty		673	8.7%
With an ambulatory difficulty		68	0.9%
With a self-care difficulty		163	2.1%
Population 18 to 64 years	30,543	4,785	15.7%
With a hearing difficulty		914	3.0%
With a vision difficulty		1,008	3.3%
With a cognitive difficulty		2,391	7.8%
With an ambulatory difficulty		2,344	7.7%

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With a self-care difficulty		1,096	3.6%
With an independent living difficulty		1,875	6.1%
Population 65 years and over	6,552	3,018	46.1%
With a hearing difficulty		1,215	18.5%
With a vision difficulty		561	8.6%
With a cognitive difficulty		812	12.4%
With an ambulatory difficulty		2,121	32.4%
With a self-care difficulty		698	10.7%
With an independent living difficulty		1,502	22.9%

Source: American Community Survey, US. Census Bureau (2010)

The highest percentage of disabilities in Macomb County occurs in the 65 and over population group (36.6%). That age group also exhibits the highest percentage of disabilities in the City of Roseville, but at a higher rate (46.1%). Many of the above individuals have more than one reported disability item, and therefore there is duplication between categories of disability items.

The majority of the identified disabled population is able to live independently with or without supportive services, or is cared for by family members in private housing arrangements. However, the data still indicates the need for specialized housing for disabled persons, particularly given the high prevalence of disabilities in the older population groups. The need for specialized housing is dependent on the type of disability. Such housing may be specialized in terms of physical modifications, sleeping accommodations, organizational structure, security monitoring, and staffing with applicable supportive services.

Through the Section 811 Supportive Housing for Persons with Disabilities program, HUD provides funding to develop and subsidize rental housing with the availability of supportive services for very low-income adults with disabilities. The Section 811 program allows persons with disabilities to live as independently as possible in the community by subsidizing rental housing opportunities which provide access to appropriate supportive services. The newly reformed Section 811 program is authorized to operate in two ways: (1) the traditional way, by providing interest-free capital advances and operating subsidies to nonprofit developers of affordable housing for persons with disabilities; and (2) providing project rental assistance to state housing agencies. The assistance to the state housing agencies can be applied to new or existing multifamily housing complexes funded through different sources, such as Federal Low-Income Housing Tax Credits, Federal HOME funds, and other state, Federal, and local programs. In FY 2012, no funding was appropriated for traditional 811 capital advances.

Homeownership by Race and Ethnicity

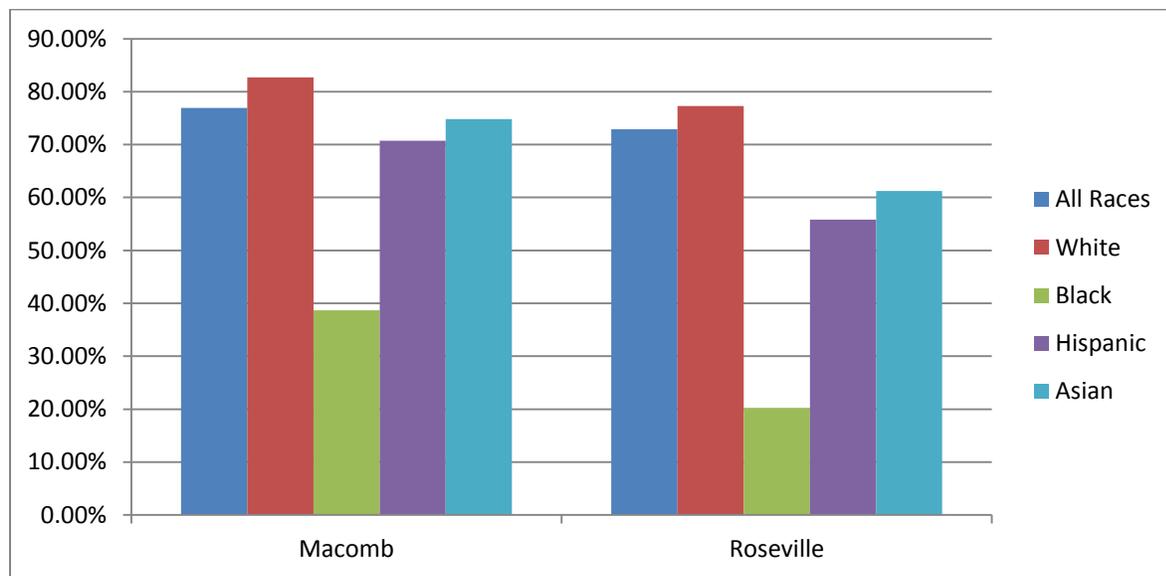
As in most areas of the country, rates of homeownership vary by race/ethnicity in Macomb County. According to the 2010 ACS, the overall rate of homeownership in Macomb County for all races was 77%. Whites in Macomb County have the highest rate of homeownership (83%), followed by Asians (75%), Hispanics/Latinos (71%), and Blacks (39%). There is a great disparity

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between the rate of homeownership for Blacks in Macomb County, in comparison to all other races/ethnicities, and the County as a whole.

In the City of Roseville, the overall homeownership rate for all races (2010 ACS) is 73%. Whites in Roseville have the highest rate of homeownership (77%), followed by Asians (61%), Hispanics/Latinos (56%), and then Blacks (20%). The same disparity (between Black homeownership rate and all other categories) occurs in Roseville as well.

Figure 13 - Homeownership Rates by Race/Ethnicity (2010)



Source: U.S. Census Bureau, American Community Survey, (2010)

To further analyze homeownership rates variations by race/ethnicity, the rate of homeownership was also examined for each municipality within Macomb County. The tables below show the varying degree of homeownership within Macomb County, using the most recent (2010) American Community Survey data from the U.S. Census Bureau (when available).

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Table 28 – Homeownership Rates by Race and Ethnicity – Macomb County

Armada				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	624	510	114	82.0%
White	615	504	111	81.7%
Black	n/a	n/a	n/a	n/a
Hispanic	n/a	n/a	n/a	n/a
Asian	n/a	n/a	n/a	n/a

Armada Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	1,864	1,742	122	93.5%
White	1,855	1,736	119	93.6%
Black	n/a	n/a	n/a	n/a
Hispanic	n/a	n/a	n/a	n/a
Asian	n/a	n/a	n/a	n/a

Bruce Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	3,026	2,782	244	91.9%
White	2,854	2,624	229	92.0%
Black	53	40	13	75.5%
Hispanic	107	84	23	78.5%
Asian	n/a	n/a	n/a	n/a

Center Line				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	3,908	2,138	1,770	54.7%
White	3,308	1,974	1,334	59.7%
Black	414	73	341	17.6%
Hispanic	47	25	22	53.2%
Asian	44	29	15	65.9%

Chesterfield Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	16,098	13,888	2,210	89.3%
White	15,078	12,949	2,129	85.9%
Black	767	321	446	41.9%
Hispanic	257	159	98	61.9%
Asian	111	94	17	84.7%

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Eastpointe				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	12,635	10,099	2,536	79.9%
White	9,134	7,756	1,378	84.9%
Black	3,083	1,811	1,272	58.7%
Hispanic	176	130	46	73.9%
Asian	86	70	16	81.4%

Fraser				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	6,011	4,052	1,509	74.9%
White	9,134	7,756	1,378	84.9%
Black	3,083	1,811	1,272	58.7%
Hispanic	176	130	46	73.9%
Asian	86	70	16	81.4%

Harrison Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	11,255	8,089	3,166	71.9%
White	10,031	7,497	2,534	74.7%
Black	838	96	742	11.5%
Hispanic	305	184	121	60.3%
Asian	50	27	23	54.0%

Lenox Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	3,028	2,674	354	88.3%
White	2,820	2,441	379	86.6%
Black	313	232	81	74.1%
Hispanic	84	60	24	71.4%
Asian	n/a	n/a	n/a	n/a

Macomb Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	25,906	24,508	1,398	94.6%
White	24,583	23,178	1,405	94.3%
Black	963	748	215	77.7%
Hispanic	444	380	64	85.6%
Asian	627	601	29	95.9%

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Memphis				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	328	224	104	68.3%
White	325	222	103	68.3%
Black	n/a	n/a	n/a	n/a
Hispanic	n/a	n/a	n/a	n/a
Asian	n/a	n/a	n/a	n/a

Mount Clemens				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	6,973	4,080	2,893	58.5%
White	5,056	3,218	1,838	63.6%
Black	1,443	593	850	41.1%
Hispanic	143	62	81	43.4%
Asian	n/a	n/a	n/a	n/a

New Baltimore				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	4,434	3,501	933	79.0%
White	4,250	3,374	876	79.4%
Black	91	68	23	74.7%
Hispanic	63	36	27	57.1%
Asian	31	24	7	77.4%

New Haven				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	1,474	1,213	261	82.3%
White	1,206	988	218	81.9%
Black	275	195	80	70.9%
Hispanic	57	42	15	73.7%
Asian	n/a	n/a	n/a	n/a

Ray Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	1,445	1,270	175	87.9%
White	1,376	1,218	158	88.5%
Black	n/a	n/a	n/a	n/a
Hispanic	n/a	n/a	n/a	n/a
Asian	n/a	n/a	n/a	n/a

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Richmond				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	2,412	1,871	541	77.6%
White	2,159	1,643	516	76.1%
Black	n/a	n/a	n/a	n/a
Hispanic	57	25	32	43.9%
Asian	n/a	n/a	n/a	n/a

Richmond Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	1,193	1,098	95	92.0%
White	1,187	1,101	86	92.8%
Black	n/a	n/a	n/a	n/a
Hispanic	n/a	n/a	n/a	n/a
Asian	n/a	n/a	n/a	n/a

Romeo				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	1,472	1,141	331	77.5%
White	1,406	1,023	383	72.8%
Black	57	38	19	66.7%
Hispanic	56	38	18	67.9%
Asian	n/a	n/a	n/a	n/a

Roseville				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	20,061	14,619	5,442	72.9%
White	16,770	12,956	3,814	77.3%
Black	2,163	437	1,726	20.2%
Hispanic	276	154	122	55.8%
Asian	224	137	87	61.2%

Shelby Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	28,713	22,835	5,878	79.5%
White	26,254	21,153	5,101	80.6%
Black	857	242	615	28.2%
Hispanic	474	241	233	50.8%
Asian	698	496	202	71.1%

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Utica				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	2,218	1,290	928	58.2%
White	2,058	1,211	847	58.8%
Black	n/a	n/a	n/a	n/a
Hispanic	59	22	37	37.3%
Asian	54	27	27	50.0%

Washington Township				
	Total Housing Units	Owner Occupied	Renter Occupied	% Home Ownership
Overall	8,967	7,566	1,401	84.4%
White	8,897	7,561	1,336	85.0%
Black	137	54	83	39.4%
Hispanic	238	161	77	67.6%
Asian	76	65	11	85.5%

Source: 2005-2009 American Community Survey

Recent Housing Accomplishments

The Macomb County Consolidated Annual Performance and Evaluation Report (CAPER) includes a summary of programmatic accomplishments and an assessment of progress toward meeting the priority needs and specific objectives identified in the county’s Consolidated Plan. The 2010-2011 CAPER discusses the county’s development objectives and how the county has been able to successfully implement programs and projects. Macomb County was awarded \$1,801,040 of Community Development Block Grant (CDBG) funds to allocate to projects and programs within the Urban County program.

Macomb County and the City of Roseville are also members of the Macomb HOME Consortium. In 2010 the Consortium received \$1,486,753 in HOME funds. According to the CAPER, the CDBG and HOME housing rehabilitation programs are mainstays of Macomb County’s housing effort. Since 1982, 1,322 homes have been repaired/rehabbed. During 2010-2011, seven emergency repairs were made. Habitat for Humanity constructed 11 new homes (4 with CDBG and 7 with NSP) during the reporting period in Clinton Township, Roseville, and Sterling Heights. Seven additional homebuyers were assisted through the American Dream Downpayment Initiative (ADDI). The County fought residential blight through its NSP program, and the City of Mt. Clemens enforced codes with CDBG funds.

The Macomb County CAPER chart below summarizes the Federal funds made available for furthering the objectives of the consolidated plan, including the amount committed and the total expended during the reporting period. The funds were distributed across the 21 communities included under the Macomb Urban County allocation, as well as the City of Sterling Heights,

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City or Roseville and Township of Clinton. Numerous census tracts are included within the jurisdiction with no specific identified target areas.

Table 29- Grant Status – Macomb County

Type of Funds	Amount Available	Amount Committed	Total Amount Expended
CDBG (County)	\$3,905,868.10	\$1,801,040	\$1,456,168.29
CDBG-R	\$ 459,751.00	\$ 450,751	\$ 79.00
HOME	\$4,742,567.00	\$2,349,194	\$1,015,435.22
NSP 1	\$9,765,437.00	\$ 0	\$2,536,226.17
NSP 3	\$2,536,817.00	\$2,536,817	\$ 0.00

Source – Macomb County CAPER

Table 30 -Households Assisted – Macomb County

Program	2010-2011 Planned	2010-2011 Actual
Owner Assistance		
CDBG Emergency Repair	6	6
HOME Rehab	1	1
Habitat	1	4
Renter Assistance		
CHDO (Springhill)	34	34
MSHDA	900	900
Eastpointe HC	283	283
Mt. Clemens HC	288	288
New Haven HC	88	88
Continuum of Care HARP Vouchers	225	225

Source – Macomb County CAPER

Table 31 - Assistance to Extremely Low, Very Low, and Low Income Renter Households, Macomb County, 2010-2011

Renter	ELI	VLI	LI	Total	Type
HOME - Springhill	30	4	0	344	Dev-Disabled
Eastpointe HC	137	25	3	165	Elderly LRPB
Eastpointe HC	78	37	3	118	Section 8
Mt. Clemens HC	279	8	1	288	LRPB
New Haven HC	70	16	2	88	LRPB
MSHDA	675	135	90	90	Section 8
CoC HARP Vouchers	225	0	0	225	Section 8
Total	1,494	225	99	1818	

Source – Macomb County CAPER

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On-Going Actions by Macomb County to Promote Fair Housing

The following list includes events that Macomb County has sponsored and/or attended in order to promote fair housing.

- The Macomb County Department of Planning & Economic Development (MCPED) has developed informational brochures to promote mutual understanding. The brochures will be used by business and community leaders to improve the business climate, welcome newcomers, facilitate harmony between ethnic communities, and promote Macomb County as a desirable place to live and conduct business.
- The Macomb HOME Consortium promoted housing primarily for disabled adults by awarding HOME funds to Springhill Housing Corporation, to acquire and rent decent, safe and sanitary homes to low income, primarily developmentally-disabled individuals at affordable rents. An estimated 57 income-eligible households will be directly assisted through the Neighborhood Stabilization Program, with others possible through the reinvestment of program income derived through March 2013. A number of the residents are minority.
- The County contributed \$500 to the Fair Housing Center in summer 2009, which was partially spent in 2010. It also provided 2008 CDBG assistance to the Legal Aid and Defender Association, its first year of CDBG funding for testing services. The agency did not spend all of the allocated funding.
- The MCPED completed a study of the County's aging population to identify building design and other practices to promote independent living for elderly people.
- The Macomb HOME Consortium was created in 2006, enabling 3 additional communities to provide affordable housing in ways that were previously not available. As a result, transitional housing for homeless families, permanent housing for individuals with developmental disabilities and new homes built by Habitat for Humanity are now available. During the 2010-2011 program year, over 20 minority households benefited from these three programs.
- The County developed, published, and distributed brochures, one per racial and or ethnic group, detailing the need for, and benefits to be derived by, a diverse, welcoming community. The Michigan Department of Civil Rights was complimentary of this effort.
- The County supports the Continuum of Care (CoC) with financial and other resources at all levels. In 2010, 46% of those assisted by CoC member organizations were minorities.

Public Housing Authority Policies

Public Housing is a program funded by The U.S. Department of Housing and Urban Development (HUD) for low-income residents. Annual gross income must be within limits as established by HUD, and eligible families pay a monthly rent equal to the greatest of 30% of their monthly adjusted income or 10% of unadjusted monthly income. Applicants may qualify as a family and/or as an eligible single person.

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The HUD Section 8 Housing Choice Voucher Program is a federal program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Housing assistance is provided on behalf of the family or individual, and participants are able to find their own housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. Housing choice vouchers are administered locally by public housing agencies (PHAs). A housing subsidy is paid to the landlord directly by the PHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Eligibility for a housing voucher is determined by the PHA based on the total annual gross income and family. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live.

According to the FY 2010-11 and 2012-13 Annual Action Plans for Macomb County HOME Consortium (MHC) and Macomb County Urban County, the Public Housing Commissions and the MSHDA assist approximately 2,700 households in the Macomb Home Consortium jurisdiction. The following table summarizes the units available through two rental assistance programs:

Table 32 – Units through Rental Assistance Programs

PHA	Low Rent Public Housing		Section 8	
	FY 2010-11	FY 2012-13	FY 2010-11	FY 2012-13
MSHDA	0	0	900	1,001
Clinton Township	100	100	21	21
Eastpointe	164	164	131	131
Mt. Clemens	288	288	0	0
New Haven	88	88	0	0
Roseville	102	102	309	309
Sterling Heights	153	153	41	41
Macomb CoC HARP	0	0	292	271
Total	895	895	1692	1,774

Source: Macomb County FY 2010-2011 and FY 2012-13 Annual Action Plans

Both Action Plans explain that there is no Countywide housing commission. Most of the low income renters needs have been addressed by the existing network of housing commissions and privately owned affordable rental developments. According to the Action Plans there are an undetermined number of families with Vouchers issued by housing commissions outside the MHC, which have opted to reside within the Consortium's jurisdiction. The Plans add that the County lacks sufficient resources to help any of the Macomb County housing commissions to repair and modernize their units. It observes that none of the Consortium housing commissions are undertaking a resident initiatives program.

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The Macomb County FY 2010-2011 Consolidated Annual Performance and Evaluation Report (CAPER) for Macomb HOME Consortium and Macomb Urban County, reiterate that the public housing authorities located within the County are entities completely separate from the County Government. The County indicated that some of the communities which fall under the Urban County do have public housing commissions. The County explained that it has no control over the quality of the housing and resident initiatives, but do encourage such communities to use CDBG to improve their public housing units.

Within the Macomb County HOME Consortium, Clinton Township and the cities of Roseville and Sterling Heights have Housing Commissions. Within the Macomb Urban County, the Cities of Eastpointe, Mount Clemens and New Haven have Housing Commissions.

According to Macomb's County CAPER, the Clinton Township Housing Commission (CTHC) has open monitoring findings pertaining to the Section 8 program. Since this Housing Commission is not within the Urban County, the County has indicated that it cannot help the CTHC improve its operations. The CTHC is working to resolve the findings made by HUD.

The City of Roseville passed a Resolution on June 11, 1958 to adopt the Charter Commission of the City of Roseville. Through Ordinance No. 895 the City of Roseville created the "Roseville Housing Commission" which had its basis in the State Legislature Act 18 of 1933. The Roseville Housing Commission is committed to implementing subsidized housing through federally funded programs. The Housing Commission has posted a statement in the City's Housing Department website stating that the Roseville Housing Commission adheres to the Fair Housing regulation and does not discriminate against race or color, national origin, religion, sex, familial status and handicap

The programs offered by the Roseville Housing Department are the Senior Citizen Apartments and the Section 8 Rental Assistance. The Senior Citizen Housing Program provides affordable housing for senior citizens through the Eastland Senior Building and the Lawn Senior Building. These buildings are designated for senior 62+ years of age residents of Roseville. The rent is calculated based on 30 percent of annual adjusted income. The Section 8 Housing Assistance Payment Program is a federally funded program that provides money to help families pay their rent. Families with dependents, senior citizens and/or disabled individuals are eligible for consideration if their adjusted incomes do not exceed federally established income for the area.

A review of the State of Michigan Housing Facilities Act 18 of 1933 which authorizes any city, village, township, or county to purchase, acquire, construct, maintain, operate, improve, extend, and repair housing facilities; to eliminate housing conditions which are detrimental to the public peace health, safety, morals, or welfare; and for any such purposes to authorize any of the aforementioned entities to create a commission with power to effectuate said purposes; among other things, revealed that there are no amended sections addressing fair housing and or ADA requirements.

A review of a majority of the housing commission websites (a few did not have websites) revealed that none provided information to tenants on fair housing laws and on how to file

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housing discrimination complaints. In addition, information for landlords and tenant applications on the websites did not contain any information about fair housing and how to file complaints. However, written materials at the offices and housing developments did provide information on fair housing. Since access to technology is more available through libraries, community centers and mobile devices, it would be useful to provide such information on websites.

IV. COUNTY AND CITY REGULATORY REVIEW

Introduction

This Section focuses on the review of local public sector policies to determine if such policies may limit or exclude housing facilities for persons with disabilities or other housing for homeless people from certain residential areas. HUD believes that there are instances where policies have the effect of violating the provisions of the Fair Housing Act since they may indirectly discriminate against persons with disabilities and minorities many of whom are homeless.

Macomb County and its 22 municipalities were asked to complete a Planning and Zoning Review of Public Policies and Practices questionnaire to assist with the identification of land use and zoning regulations, practices, and procedures that may act as a barrier to development and the site/use of housing for individuals with disabilities. None of the cities responded to the survey questionnaire except Macomb County and the City of Roseville.

However, the AI Consultant conducted a Review of Public Policies and Practices (Zoning and Planning Codes) through a review of the master plans and local ordinances and zoning of 20 of the 22 communities. The review seeks to identify any land use and zoning regulations, practices and procedures that act as barriers to the development, and the site and the use of housing for protected classes including individuals with disabilities. The review analyzes the master plans, and planning and zoning codes related to land use and zoning decision-making provided by participating communities in Macomb County and also the City of Roseville as a participating jurisdiction. The following information was garnered from the examination undertaken and the questionnaire.

Master Plans

A Comprehensive Plan or Master Plan provides the conceptual foundation upon which key decisions are made by both current and future decision makers. It is from this perspective that the City of Jefferson's Master Plan was reviewed for this Analysis. More specifically, this Analysis will attempt to identify to what extent the Master Plan helps Macomb County and the City of Roseville to implement its commitment to affirmatively further fair housing and to what extent portions of the Plans may serve as impediments to fair housing choice for persons protected by the Fair Housing Act (FHA).

In reviewing master plans, the following areas were examined for each city in Macomb County:

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- Inclusion of protected group demographic descriptions
- Plans for affordable/diverse communities
- References to CDBG and other Federal Housing Programs
- References to Affirmatively Furthering Fair Housing

Reference to CDBG or Other Federal Housing Programs

This review is done to determine if the Master Plan and related documents include a reference to the existence and value of the CDBG and/or other Federal housing programs, as the County and the City is a recipient of those funds. CDBG and other Federal housing program funds such as NSP have become reliable and important parts of the community development programs for communities throughout the nation, including Macomb County and the City of Roseville.

Expected uses for CDBG funds can be incorporated into the planning process and can become reliable components of a Master Plan. Inclusion of references to CDBG and other Federal housing programs in Master Plans also serves as a way to inform local citizens of the valuable existing relationships and those that can be developed, between Local, State and Federal governments.

Affirmatively Further Fair Housing

Each community that accepts Federal CDBG funds has agreed that it will "affirmatively further fair housing" and will report to HUD actions that it has taken to implement that pledge.

The following information was garnered from this review and is more fully detailed in Table 33 below:

- Several of the master plans did not include specific data on protected classes. Armanda Village (2007), Center Line City (1993), Shelby Township and Utica included specific data on national origin and race.
- None of the master plans provided specific data on disability status.
- Each master plan for the community and the County include some language that recognizes and seeks to promote diversity of communities, housing types and promotion of "a full range of housing choices." There is no specific language that speaks to promoting and facilitating housing opportunities for persons in the protected classes such as elderly
- Most of the communities included some reference to CDBG and other federal programs except for about nine cities.
- None of the master plans for the cities and Macomb County include a reference to Affirmatively Furthering Fair Housing (AFFH) although most of them receive federal funding from Macomb County as a sub-grantee or directly from HUD such as Macomb County and the City of Roseville.

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Table 33 - Macomb County CDBG Communities Summary of Information from Local Master Plan Documents

Community/ Date of Plan	Inclusion of Protected Class Demographic Description	Plans for affordable & diverse Community	Reference to CDBG or other Federal Housing Programs	Refer To AFFH*	Other Items
Armada Township 2004	No specific data on national origin, race or disability status.	“Promote a diversity of residential densities.”	None	None	None
Armada Village 2007	Includes national origin and race data.	“Provide for a range of residential styles and densities to meet needs of diverse population”.	Not specifically	None	CDBG reference for economic development.
Bruce Township 2008	No specific data on national origin, race or disability status.	“Promote a diversity of housing types.”	None	None	“Promote development of quality housing.”
Center Line City 1993	Includes national origin and race data.	“Providing a full range of housing choice.”	None	None	Has existing subsidized housing.
Chesterfield Township 2002	No specific data on national origin, race or disability status.	“Re-examine density transitions in residential areas.”	None	None	“Plan and zone for larger lot and density type.”
Eastpointe 2010	No specific data on national origin or disability status	Focus on expanding Home Maintenance Program.	Use CDBG to control issue of creeping blight and abandonment.	None	
Fraser 1992	No specific data on protected group. “Diversity of citizens noted.	“Maintain a balanced single family community.”	None	None	“Separate single and two family residential areas from all other uses.
Harrison Township 2010	No specific data on national origin or disability status.	Reassess densities and setbacks within the Multifamily zoning district.	None	None	“Consider the elimination of the multiple family high-rise district.
Lennox Township 2004	No specific data on national origin, race or disability status.	“Promote residential projects that assist first-time young homebuyers and retired residents”	CDBG program Administration mentioned as services provided by the County.	None	“Residents to stay in Lennox when housing needs change.”

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Community/ Date of Plan	Inclusion of Protected Class Demographic Description	Plans for affordable & diverse Community	Reference to CDBG or other Federal Housing Programs	Refer To AFFH*	Other Items
Macomb Township 2008	No specific data on national origin, race or disability status.	“Provide a diversification of housing types to serve needs of all resident age groups.”	Includes Reference to CDBG and other government programs.	None	In future, various levels of elderly housing needed due to aging of population.
Memphis City 1998	No specific data on national origin, race or disability status.	“Multiple family housing units are a valuable asset to any city.”	Include reference to CDBG and other government programs.	None	Includes descriptions of several state and federal funding programs.
Mount Clemens City 2009	No specific data on national origin or Disability status.	Permit higher density housing and mixed use buildings in and around business districts.	None	None	
New Baltimore City 2005	No specific data on national origin, race or disability status	“Provide for a variety of housing types including multi-family residential.	General reference to possible state and federal funding programs. No CDBG reference.	None	Strong emphasis on historic preservation.
New Haven Village 2010	No specific data on national origin, race or disability status	“Provide more variety in housing type and style to meet the needs of residents according to age, life-style, and income.”	Specific reference to CDBG and other federal and state funding programs.		“Encourage the rehabilitation of older subdivisions and individual homes that may have deteriorated over time.”
Ray Township 2010	No specific data on National origin, race or disability status.	“Encourage development of an overall community which provides housing for all types of residents.”	None	None	Multi-family recommend at less than 6 units per acre.
Richmond City 2002	No specific data on national origin, race or disability status.	Affordable housing not feasible for private market. Need state or federal assistance.	Referenced CDBG and other federal and state programs.	None	Richmond offers a broad range of housing types and prices.

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Community/ Date of Plan	Inclusion of Protected Class Demographic Description	Plans for affordable & diverse Community	Reference to CDBG or other Federal Housing Programs	Refer To AFFH*	Other Items
Richmond Township 2002 Per staff no changes to Plan.	No specific data on national origin, race or disability status.	Lack of public services makes higher density housing unlikely.	No specific reference to CDBG or other federal housing programs.	None	Primary emphasis on preserving, rural, agricultural areas.
Roseville City Plan Not Reviewed.	Includes data on national origin, race. No data on disability status.	“Preserve City’s housing stock.”	Referenced CDBG and other federal and state programs.	None	Reuse under-utilized office and retail sites for urban mixed-use residential development.
Romeo Village 2008	No specific data on national origin, race or disability status.	“Increase the quality of rental housing.”	No specific reference to CDBG or other federal housing programs.	None	Limits on conversion to multiple family dwellings.
Shelby Township 2009	Includes national origin, race and other characteristics, except disability status.	“Provide diversified housing opportunities that can accommodate needs of residents at all stages.”	No specific reference to CDBG or other federal housing programs.	None	“Create and protect strong neighborhoods that endure as diverse, attractive, and hospitable places to reside.”
Utica 1993 Plan Not Reviewed	Includes race and other protected group data except disability status.	Seek means of encouraging Housing for the elderly and for low and moderate income households.	Includes description of CDBG and several other state and federal programs.	None	Encourage densities which relate to natural and manmade environmental features.
Washington Township 2005	No specific data on national origin, race or disability status.	“Provide a variety of housing types and designs.”	No specific reference to CDBG or other federal housing programs.	None	

Local Zoning Ordinances

Zoning Ordinances, are enforceable in courts of law by the local community and therefore warrant even closer attention to help ensure that the ordinances help the community "affirmatively further fair housing" and do not, either intentionally or unintentionally, serve as "impediments to the exercise of fair housing choice".

In considering how local zoning ordinances might create impediments to fair housing choice, the following areas were reviewed because of the possible adverse effects they could have on families and persons with disabilities:

- Definitions used for "families" and "adult foster care facilities,"
- Regulations (if any) regarding "adult foster care facilities,
- Unreasonable restrictions on developing multi-family units, such as lot size requirements.

The following information was garnered from the review of planning and zoning information and is further detailed in Table 34 below:

- Many of Macomb County municipalities have a specific definition for family in their zoning ordinance. Definitions of "family" vary from municipality to municipality and include "individuals domiciled together" to "one or more related persons plus one unrelated living together limited to 6" and "one or more persons living together related blood, marriage or adoption plus one unrelated."
- Several municipalities define a family as "4 or more persons not related if handicapped" and specifically reference the Fair Housing Amendment Act (FHA) of 1988.
- Adult foster care facilities are more restricted in where they are permitted under zoning designations in some municipalities. Most of the municipalities in Macomb County do not have a specific definition for adult foster care facilities in their zoning ordinance and as a result do not have any institutional restraints on their placement. Other municipalities allow foster care facilities only in R-1, residential districts, limit the number of adults, and require land use approvals and licenses.
- Minimum lot sizes for single family residential development in Macomb County municipalities range from 3,500 square feet to 90,000 square feet and multi-family maximum structure height range from 2 stories high to high-rise of unlimited height.
- No unreasonable restrictions on developing either single family residential or multi-family housing units were identified.

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- No zoning ordinances were identified in any of the cities that restrict housing opportunities for disabled individuals, nor deny housing opportunities for disabled individuals with on-site housing supporting services.
- No zoning or land use policies were identified that had a different set of restrictions on the number of unrelated disabled persons residing together than it has for the general population.
- Most zoning ordinances provide a land use matrix (which identifies in which districts specific uses are allowed. Applicable standards depend on the specific zoning district in which the property is located and the particular type of residential use.
- None of the zoning ordinances describe any areas in the county as exclusive.

Like other development types, a residential development site must first be zoned appropriately before construction can begin. Any housing development that is not allowed by the existing zoning must be rezoned and required an application and public hearing process. If opposition to a proposed development is encountered, multiple and/or delayed public hearings can result, further increasing development costs.

Since density and lot size are key factors in the cost of new housing, inexpensive land and small lots can significantly reduce development costs. Infill housing – the construction of new housing units among older, existing units in established neighborhoods – is a means by which to expand affordable housing. Infill lots tend to be smaller and contain existing infrastructure, and redeveloping such lots should cost less. However, problems of rezoning, obtaining a clear title, dealing with property liens, and upgrading the infrastructure can make infill housing expensive. In addition, developers stated that, unless several adjacent lots can be acquired together, small profit margins prevent the redevelopment of infill housing. The cities and Macomb County charges fees to cover various operating costs related to regulating development. These fees can heavily impact small nonprofit developers with limited capital.

Table 34- Macomb County CDBG Communities - Summary of Information from Local Zoning Ordinances

COMMUNITY	Minimum Lot Size for S/F Residential	Definition of "Family"	Adult Foster Care Facilities	Multi-Family Maximum Structure Height	Other Comments
Armada Township	R-1 165 x 200	4 or more not related if handicapped. Reference to FHA	No provision for or restriction of AFC	RM 2 stories 35'	Specifically referenced Fair Housing Amendments Act (FHA) of 1988
Armada Village	R-1 8,400 sq. ft.	"Interrelated" and not more than 3 boarded persons.	Provision for AFC with special approval use in R1.	RM 3 stories 35' limit of 8 units per acre.	
Bruce Township	R-2 90,000 sq. ft. R-1A 40,000 sq. ft. R-1B 20,000 sq. ft. R-1C 12,000 sq. ft. R-S- 5 acres	No limit to # if related plus 1 not related. Up to 6 unrelated	Provision for AFC with special land use approvals	RM-1 2 stories ,25' RM-2 2.5 Stories 30'	
Center Line	R-1 9,600 sq. ft. R-2 5,500 sq. ft.	Related plus two, or any group of two or less.	No provision for or restriction of AFC	RM 2 stories 25' RM-1 High rise unlimited	
Chesterfield Township	R-1A 13,500 sq. ft. R-1B 9,750 sq. ft. R-1C 7,800 sq. ft.	Includes 4 or more persons not related if handicapped. Reference to the FHA	No provision for or restriction of AFC.	High-rise allowed. 250' limit.	
Eastpointe	R-1 6,000 sq. ft. R-2 3,500 sq. ft.	Individuals domiciled together.	AFC limit of 6 in R-1	RM-2 5 Stories 48'	
Fraser	RL 10,200 sq. ft. RM 7,800 sq. ft.	Includes 4 or more persons not related if handicapped. Reference to the FHA	No provision for or restriction of AFC in R-1	RM-2 2 or 2.5 stories	
Harrison Township	R1-A 12,000 sq. ft. R1-B 10,800 sq. ft.	Includes 4 or more not related if	No restriction on AFC in R1	RM-1, 2 or 3 2.5 stories 30'	

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COMMUNITY	Minimum Lot Size for S/F Residential	Definition of “Family”	Adult Foster Care Facilities	Multi-Family Maximum Structure Height	Other Comments
	R1-C, 9,600 sq. ft. R1-D 8,400 sq. ft.	handicapped. Reference to FHA.			
Lennox Township	AG 2 acres RL 1 acre RM 9,600	Includes a collective number of individuals.	No provision for or restriction of AFC in AG or RL	RH 2.5 Stories 30’	
Macomb Township	R-1 & R-1-E 40,000 sq. ft. R-1-S 30,000 sq. ft.	“One or more persons living together”	No provision for or restriction of AFC in AG or RL	R2-L & R-2 2 stories 25’	
Mount Clemens	R1-A 6,000 sq. ft R1-B 5,000 sq. ft	One or more related and 4 or more not related if disabled. Reference FHA.	No provision for AFC.	6 stories 80’	
New Baltimore	R-80 12,000 sq. ft R-70 8,400 sq. ft R-65 7,800 sq. ft	Household head and others related by blood, marriage or adoption	Possible review requirement for AFC in single family districts.	RM-1 2 stories 32’ RM-2 3 stories 40’	Group day care 7-12 adults may be permitted with special approval use
New Haven Village	SF 12,000 sq. ft SF-1 8,700 sq. ft Sf-2 7,200 sq. ft	Includes Unrelated individuals Domiciled together.	AFC defined to meet definition of family. From 7 to 12 adults.	MF 2. 5 stories 35’	
Ray Township	R-1 90,000 sq. ft RT 60,000 sq. ft R20 20,000 sq. ft	One or more related persons plus one unrelated living together limited to 6.	AFC permitted in R-1 and RT districts	RM 3 stories 35’	
Richmond City	R-1, R-2 & R-3 10,890 sq. ft R-T 8,400 sq. ft	One or more persons living together related by blood, marriage or adoption plus one unrelated.	AFC home of 6 or less allowed in R - 1 - R - 3 districts and in larger homes in RM.	RM-1 2 stories 35’	Accessible parking space requirements noted.

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COMMUNITY	Minimum Lot Size for S/F Residential	Definition of "Family"	Adult Foster Care Facilities	Multi-Family Maximum Structure Height	Other Comments
Richmond Township	R-1 30,000 sq. ft R-2 22,500 sq. ft	One or more persons living together and 4 or more if handicapped Reference FHA.	Provisions for AFC in residential districts with special land use approval.	RM 2 stories 32'	Information provided by Township staff
Romeo Village	R-1 7,200 sq. ft	Includes handicapped persons covered by the FHA.	State license requirement for AFC of 6 or less.	RM 2 stories 30'	
Roseville City	R-1A 15,000 sq. ft R-1 5,500 sq. ft R-2 4,000 sq. ft	One or more persons living together up to 3 and 4 or more if handicapped. Reference to FHA.	Provisions for AFC in residential districts R-1A & R-1. Limit 6 adults. Licensing required.	RM-1 2 Stories 25' RM-2 (High rise) No maximum	Handicap Parking spaces furnished as required by state and federal law.
Shelby Township	R-1 30,000 sq. ft. R1-A 19,800 sq. ft. R1-B 14,400 sq. ft. R1-C 12,000 sq. ft.	4 or more handicapped persons covered by the FHA.	AFC limited to R1-B and R1-C.	RM 250' maximum R-3 - R-7 2 stories 35' R-8- R 12 40'	
Utica Not Reviewed Utica Staff provided information.	R-1A 7,500 sq. ft. R-1B 5,000 sq. ft. R-2 8,800 sq. ft.	Includes a collective body of persons.	AFC limit to no more than 6 adults and license requirements.	R-3 2.5 stories. 30'	Provisions for accessible parking included.
Washington Township	R1-A 30,000 sq. ft. R1-B 20,000 sq. ft. R1-C 15,000 sq. ft. R1-D 10,000 sq. ft.	Related up to 3 and includes 4 if handicapped. Reference FHA	No provision for or restriction of AFC	RM 2 stories 32'	Handicap Parking spaces as required by state and federal law.

V. COMPLIANCE DATA AND ANALYSIS

Introduction

This section contains an analysis of home loan, community reinvestment and fair housing complaint data. Community Reinvestment Act (CRA) performance ratings and Home Mortgage Disclosure Act (HMDA) data are used in AIs to examine fair lending practices within a jurisdiction. Data regarding fair housing complaints and cases help to further illustrate the types of fair housing impediments that may exist. This section also includes a summary of fair housing legal cases for 2005 to present.

CRA Compliance

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. The Community Reinvestment Act (CRA) requires the FDIC, in connection with the examination of a State nonmember insured financial institution, to assess the institution's CRA performance. A financial institution's performance is evaluated in the context of information about the institution (financial condition and business strategies), its community (demographic and economic data), and its competitors. Upon completion of a CRA examination, the FDIC rates the overall CRA performance of the financial institution using a four-tiered rating system. These ratings consist of:

- * Outstanding
- * Satisfactory
- * Needs to Improve
- * Substantial Noncompliance

From 2002 to present, four (4) banks based in Macomb County received CRA Performance Ratings. In addition, two (2) banks based in Detroit received CRA Performance Ratings. Five banks received a rating of "Satisfactory," and one (1) bank received a rating of "Outstanding."

Table 35 - FDIC CRA Performance Ratings

FDIC Release Date	Bank Name	City	State	Last FDIC CRA Rating	Asset Size (in thousands)
05/01/2012	First State Bank of East Detroit	Eastpointe	MI	Satisfactory	\$584,899
08/01/2008	Community Central Bank	Mount Clemens	MI	Satisfactory	\$518,552
04/01/2009	Citizens State Bank	New Baltimore	MI	Satisfactory	\$197,898
04/01/2004	Macomb	Clinton	MI	Satisfactory	\$90,995

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FDIC Release Date	Bank Name	City	State	Last FDIC CRA Rating	Asset Size (in thousands)
	Community Bank	Township			
01/01/2006	Detroit Commerce Bank	Detroit	MI	Outstanding	\$78,107
06/01/2009	First Independence Bank	Detroit	MI	Satisfactory	\$161,139

Source: FDIC, <http://www2.fdic.gov/crapes/>

Home Mortgage Disclosure Act (HMDA) Data Analysis

Home Mortgage Disclosure Act (HMDA) data consists of information about mortgage loan applications for financial institutions, savings and loans, savings banks, credit unions and some mortgage companies. The data contains information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants. The data deemed most pertinent to this report and analyzed herein is limited to loan denial rates by location within areas of racial/ethnic and income distinction for loans for 1 – 4 family dwellings and manufactured homes, but excluding data on loan applications for investment purposes (non-owner occupancy). Three types of loan products were included: home-purchase loans (conventional and government-backed), re-financings, and home improvement loans.

HMDA provided the disposition of various types of loan products at the Census Tract level, which were extracted and displayed for each individual tract comprising Macomb County. These tracts were analyzed to identify those whose median income (in relation to the MSA) fell below that of the County as a whole, and those with a significantly higher minority concentration than the County-wide rate. Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the Census Tract in which the subject property of the loan was located to identify if there were any discernible patterns that might suggest discriminatory lending practices based on race.

It should be noted that Macomb County is included in HMDA data for the Warren-Troy-Farmington Hills, MI MSA/MD. Every Census Tract classified as Macomb County within the Warren-Troy-Farmington Hills MSA was used for examination of housing loans. In addition, HMDA data for the entire MSA was included and used as a tool for analysis of lending practices. Discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas.

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General Loan Application Data

The most recent available HMDA data was for the 2010 calendar year and utilized in this analysis (extracted from HMDA Aggregate Table 1, 2010). Data for Macomb County can be found in Appendix 2. Data for the City of Roseville can be found in Appendix 3.

In summary, among all Census Tracts in Macomb County, there were 27,373 loan applications made for purchase, refinancing, or improvement of owner occupied homes. Of this total, 6,391 applications were denied (23.35%). Among all Census Tracts in the City of Roseville, there were 796 loan applications made for purchase, refinancing, or improvement of owner occupied homes. Of this total, 238 applications were denied (29.90%).

Analysis of Denial Rates for Minority Census Tracts

For purposes of this analysis, a “minority” tract is defined as a Census Tract where the minority concentration exceeds the overall total by at least 10%. The total percentage of minority residents in Macomb County is 15%. The percentage of minority residents in the City of Roseville is 17%. Therefore, tracts in Macomb County with 25% or greater minority population were considered “minority.” Tracts in Roseville with a minority population of 27% or greater would be considered “minority.”

Among all 211 identified Census Tracts in Macomb County, just six (6) met the definition for “minority” being used in this analysis. Of these, all 6 (100%) had an application denial rate higher than that of the County as a whole (23.35%). Collectively, among these “minority” Tracts there were 453 loan applications and 155 denials, equating to a denial rate of 34.22%, which exceeds that of the County by more than 10%. This variance could indicate discrimination in lending based on property location in areas of minority concentration.

Of the six (6) minority Census Tracts, five (5) tracts met HUD’s definition of low- and moderate income (not greater than 80% Area Median Income). Additional HMDA data looking at race/ethnicity was available for the Warren-Troy-Farmington Hills MSA, in addition to the Macomb County HMDA data maps on the following pages.

Data for Warren-Troy-Farmington Hills MSA

The HMDA data for the Warren-Troy-Farmington Hills MSA is included to look at the overall disposition of loan applications by race/ethnicity.

There are significant variances in the rates of loan origination between minority and non-minority applicants. Rates of conventional loan origination were 68.10% for Whites, 51.63% for Blacks, 55.36% for Hispanics, and 64.52% for Asians. Rates of conventional loan denials present a stark contrast at 16.67% for Whites, 31.90% for Blacks, 24.40% for Hispanics, and 18.61% for Asians. This data reveals that the minority applicants, overall, have a lower rate of origination and higher rate of denial.

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Table 36 - Disposition of Loan Applications by Race/Ethnicity Warren-Troy-Farmington Hills MSA, 2010

	Number of Loans on 1-4 Family Dwellings			
	Federally Insured	Conventional	Refinance	Home Improvement
White – Received	12,598	11,391	48,975	2,658
Originated	67.67%	68.10%	60.57%	42.14%
Denied	16.83%	16.67%	21.58%	44.06%
Other Disposition	15.50%	15.23%	17.85%	13.81%
Black – Received	1,767	674	1,334	328
Originated	53.88%	51.63%	42.65%	29.27%
Denied	28.07%	31.90%	33.58%	60.67%
Other Disposition	18.05%	16.47%	23.76%	10.06%
Hispanic - Received	233	168	460	49
Originated	64.38%	55.36%	48.48%	30.61%
Denied	19.74%	24.40%	29.35%	48.98%
Other Disposition	15.88%	20.24%	22.17%	20.41%
Asian – Received	298	806	2,895	74
Originated	56.71%	64.52%	65.01%	25.68%
Denied	26.17%	18.61%	17.72%	58.11%
Other Disposition	17.11%	16.87%	17.27%	16.22%

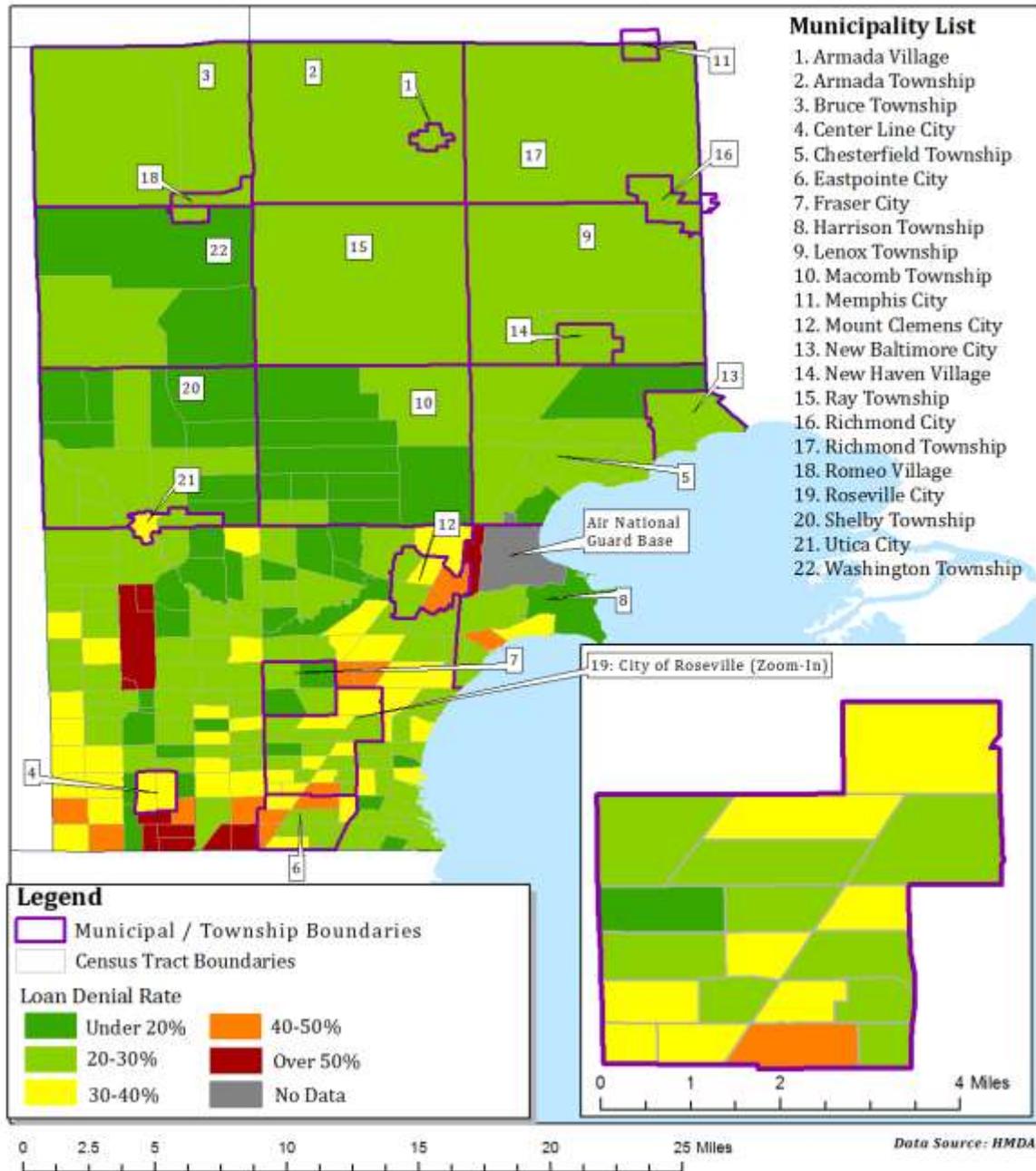
Source: HMDA Aggregated Reports, 2010

This data indicates a certain degree of discrimination in lending based on minority racial/ethnic characteristics of the property location. Although this represents a characteristic of the overall MSA, conclusively determining correlation would require a greater degree of statistical analysis that takes into account other applicant characteristic factors effecting underwriting decisions.

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Map 19

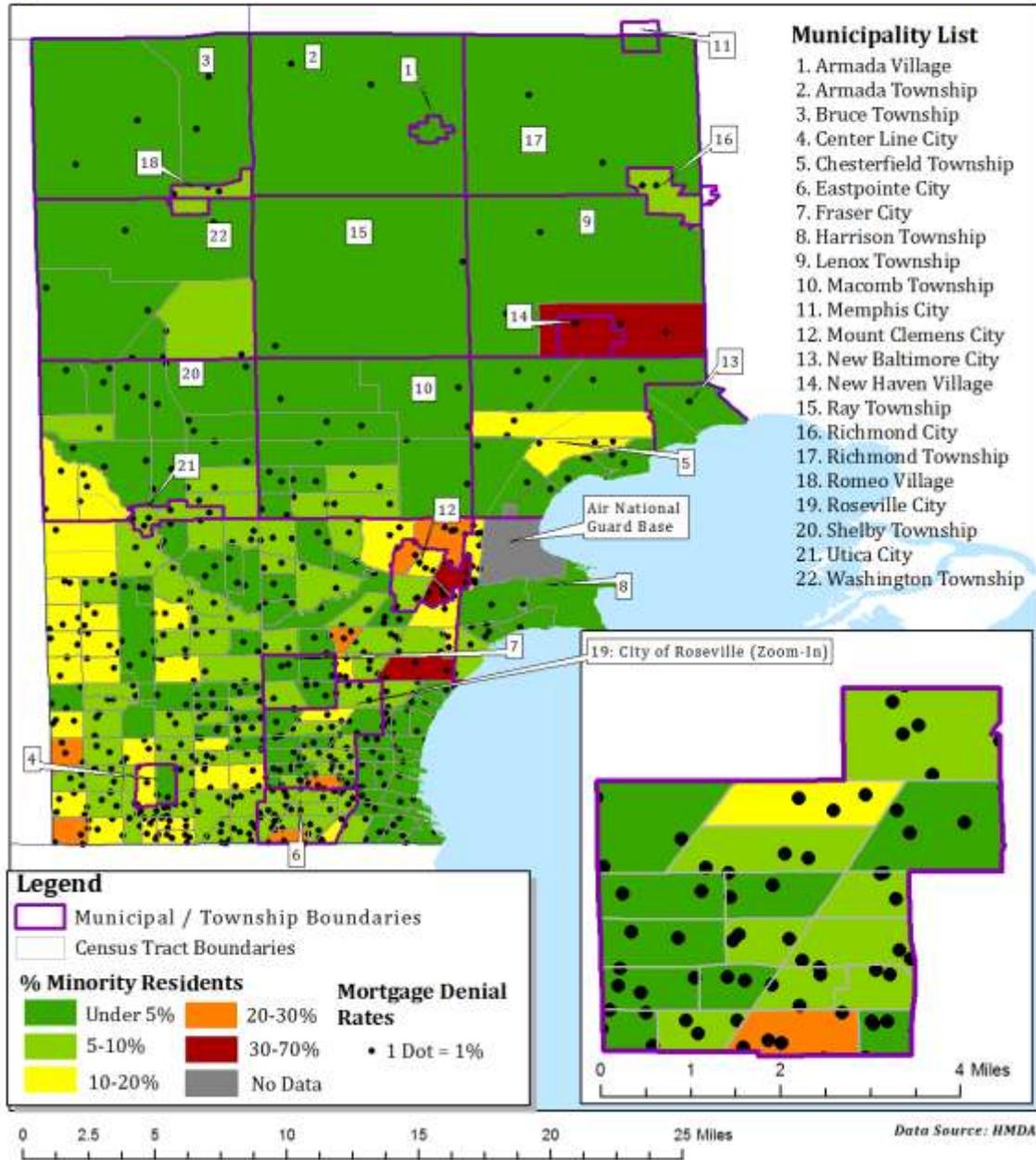
Macomb County: Loan Denial Rates in 2010 from HMDA



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Map 20

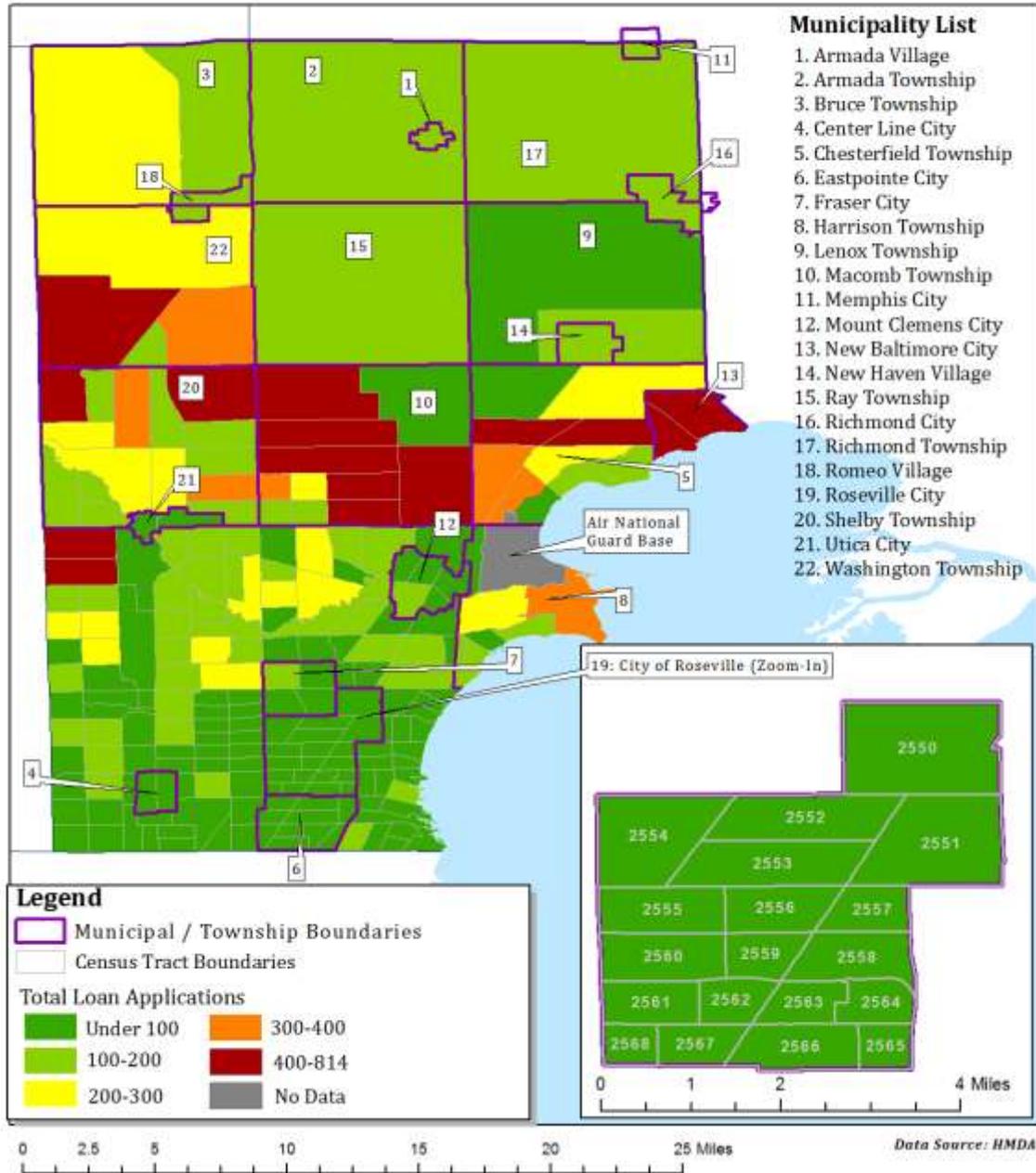
Macomb County: Mortgage Denial Rates by % Minority Residents in 2010 from HMDA



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Map 21

Macomb County: Total Loan Applications in 2010 from HMDA



Foreclosure Data

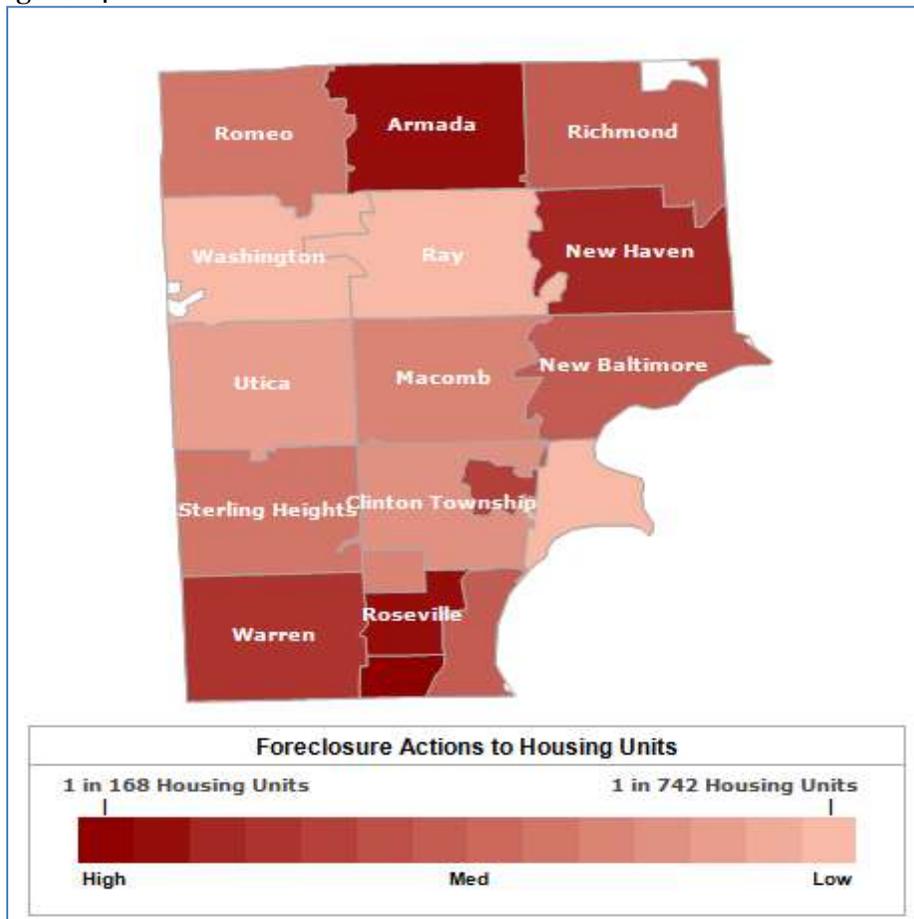
Analysis of foreclosure data was gathered from RealtyTrac.com. RealtyTrac is recognized as the most comprehensive, one-stop source of foreclosure data. The RealtyTrac data management system was utilized to gather the figures and charts cited herein, including homes in pre-foreclosure, at auction, and bank-owned (REO) properties.

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Macomb County Foreclosures

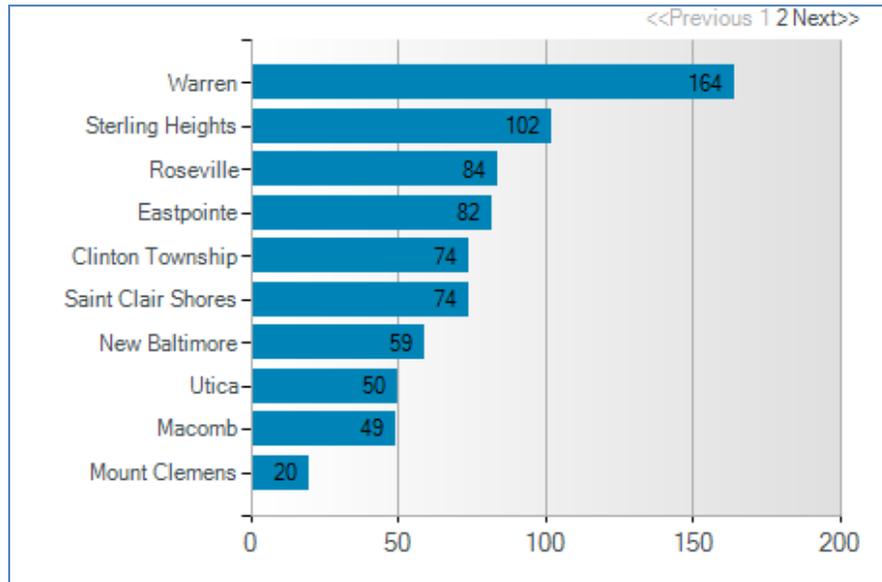
In May 2012, Macomb County had 851 single-family housing units in foreclosure, or 1 out of every 418 of the City's housing stock. This is considered a low rate of foreclosure by RealtyTrac, although some areas of Macomb County show much higher foreclosure rates. Foreclosures include all for-sale housing unit types (single-family attached/detached and condominium) in pre-foreclosure, bank ownership, or up for auction. This rate is highest in Eastpointe (1 out of 168 housing units), followed by Armada (1 in 199 housing units) and Roseville (1 out of 254 housing units).

Figure 14



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Figure 15 -Foreclosure Activity Counts Macomb County, Michigan, June 2012



Source: RealtyTrac, 2012

RealtyTrac tracks current foreclosure activity and interest rates on 30-year mortgages. Foreclosure activity is based on total number of properties that receive foreclosure filings – default notice, foreclosure auction notice, or bank repossession – each month. Interest rate is based on average 30-year fixed rate from Freddie Mac’s Primary Mortgage Market Survey. In October 2011, foreclosures in Macomb County reached a 12-month high of 1,762 foreclosures. The lowest 12-month foreclosure point occurred in March 2012, with 773 foreclosures. The highest interest rate occurred in July 2011 (4.55%), followed by June 2011 (4.51%) and August 2011 (4.27%). The lowest interest rates in Macomb County are shown in May 2012 (3.80%), February 2012 (3.89%) and April 2012 (3.91%).

Figure 16 - 12-Month Foreclosure Activity and 30-Year Mortgage Rate Macomb County, June 2011 to May 2012

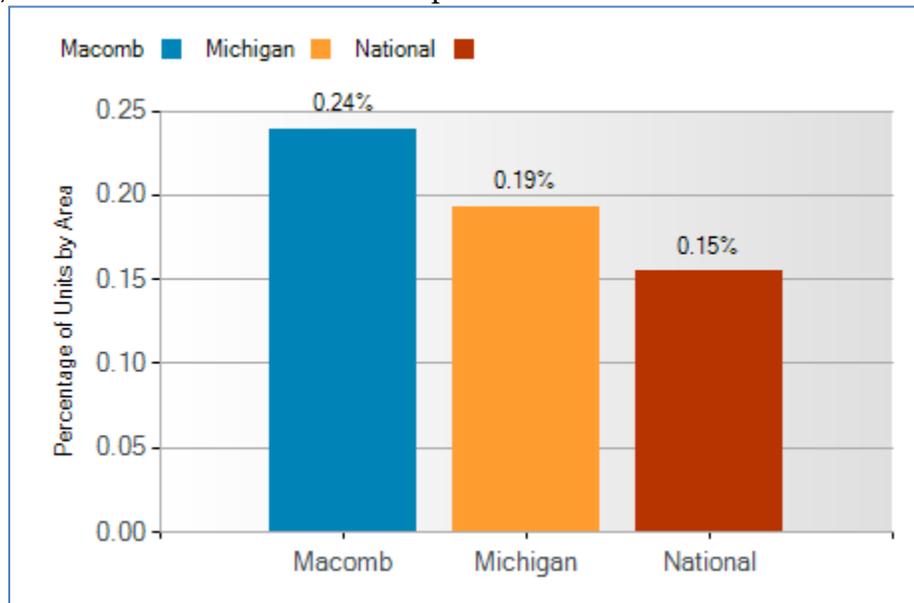


Source: RealtyTrac, 2012

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To determine current foreclosure rates, RealtyTrac divides the number of properties that received a foreclosure filing in the most recent month by the total number of housing units in the county, state, or nation. When compared to the State of Michigan and the U.S. as a whole, Macomb County currently has a significantly higher foreclosure rate (0.24% of units) than other levels in comparison: Michigan at 0.19% of units and U.S. at 0.15 percent of units.

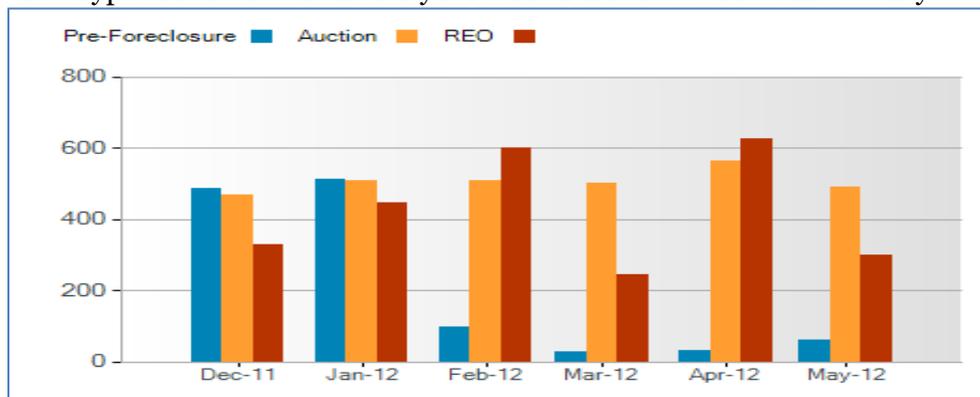
Figure 17 - Current Foreclosure Rate Comparison



Source: RealtyTrac, 2012

RealtyTrac also tracks the past and current number of foreclosures by type. These counts are based on the total number of properties that received a foreclosure filing, broken down by type of filing – default notice, foreclosure auction notice, or bank repossession (REO). Based on those counts, RealtyTrac categorizes the 6-month trend in foreclosure activity as “Falling” in Macomb County.

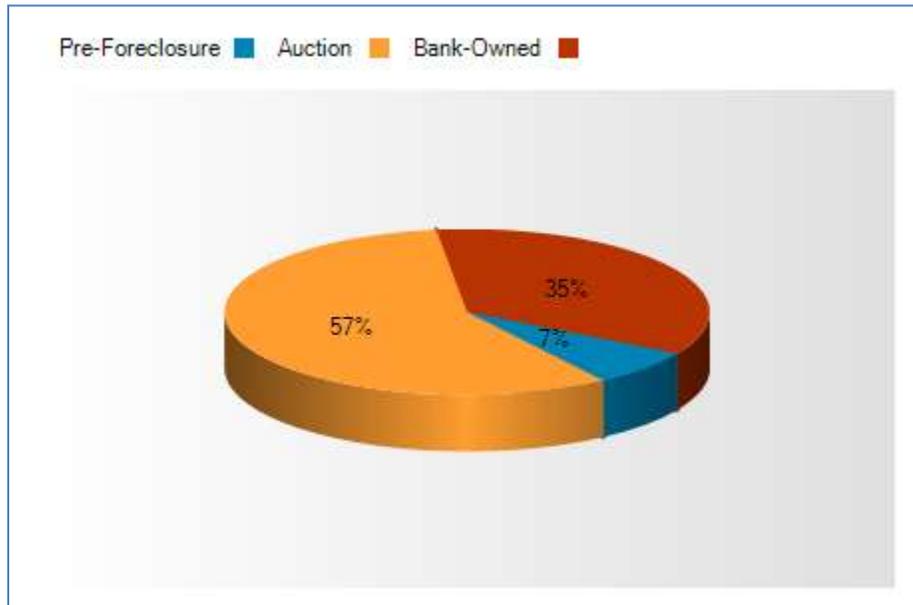
Figure 18 - Type of Foreclosure Activity for 6-Month Period - Macomb County



Source: RealtyTrac, 2012

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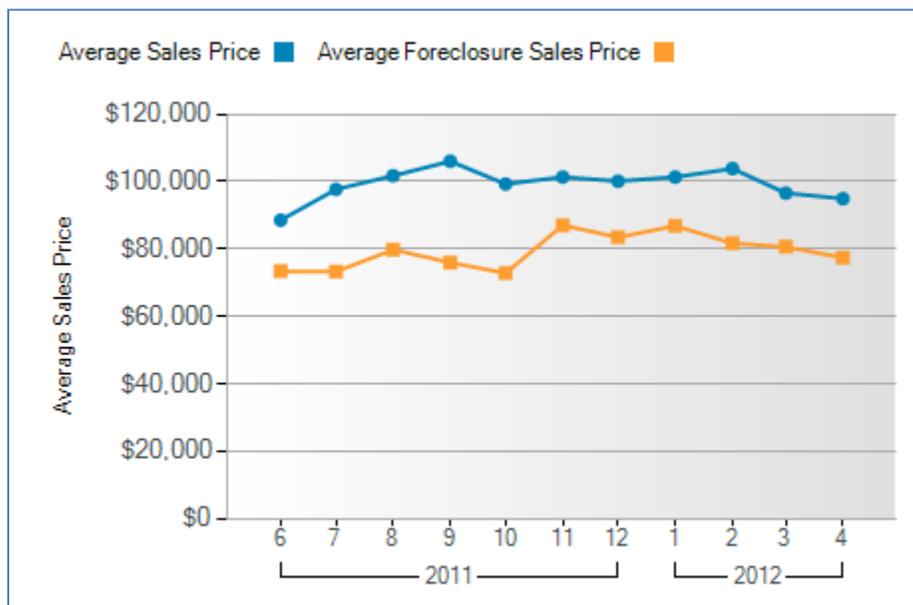
Figure 19 - Foreclosure Status Distribution – Macomb County



Source: RealtyTrac, 2012

RealtyTrac tracks foreclosure sales prices, as well as the foreclosure and non-foreclosure sales prices in Macomb County. The most recent difference in price between foreclosure and non-foreclosure sales is \$17,531 (18% savings on foreclosed prices).

Figure 20 -Average Sales Price Comparison Macomb County, Michigan



Source: RealtyTrac, 2012

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City of Roseville Foreclosures

The RealtyTrac data was available for the City of Roseville (zip code 48066). As of May 2012, the City of Roseville had 84 single-family housing units in foreclosure, or 1 out of every 254 of the City's housing. This is considered a high rate of foreclosure by RealtyTrac. Foreclosures include all for-sale housing unit types (single-family attached/detached and condominium) in pre-foreclosure, bank ownership, or up for auction.

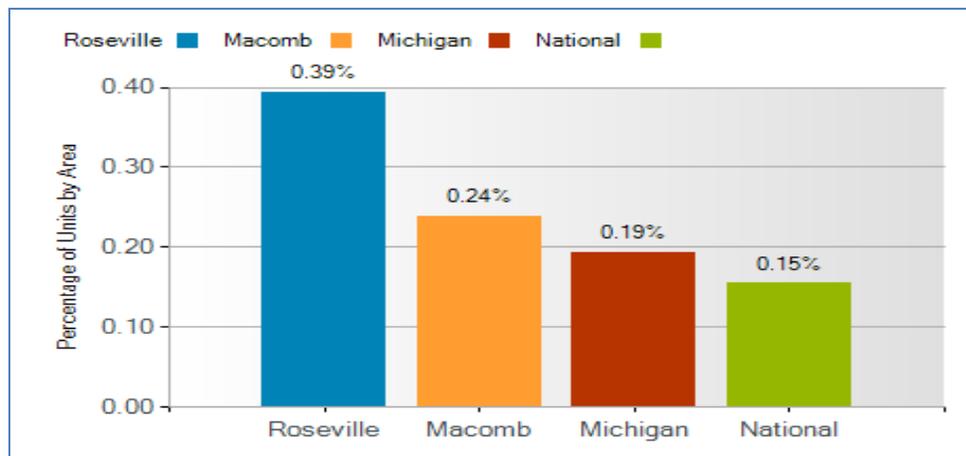
Figure 21 -12-Month Foreclosure Activity and 30-Year Mortgage Rate City of Roseville, June 2011 to May 2012



Source: RealtyTrac, 2012

In September 2011, foreclosures in Roseville reached a 12-month high of 156 foreclosures. The lowest 12-month foreclosure point in Roseville occurred in May 2012, with 84 foreclosures. The interest rates are the same as those recorded for Macomb County. The highest interest rate for Roseville occurred in July 2011 (4.55%), and the lowest interest rate is shown in May 2012 (3.80%).

Figure 22 - Current Foreclosure Rate Comparison



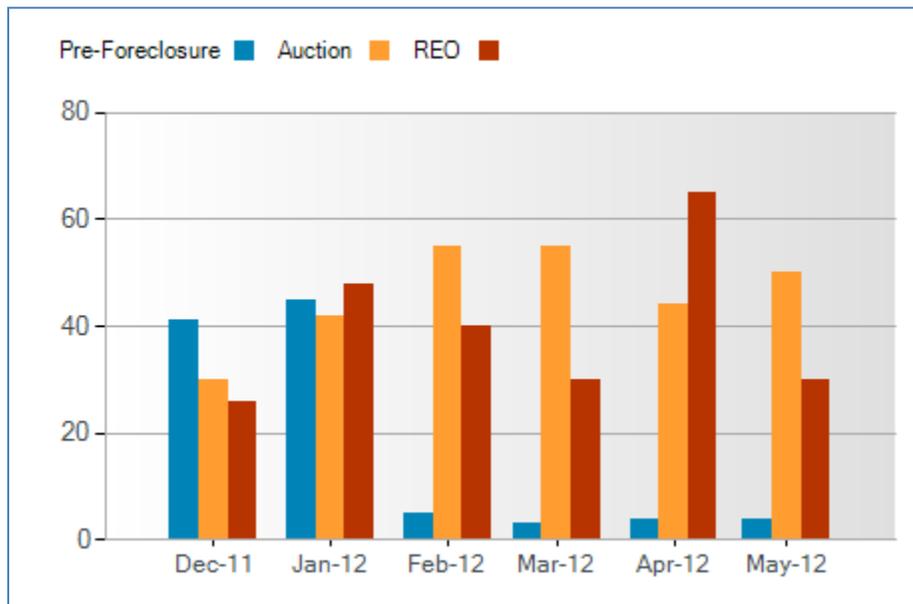
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Source: RealtyTrac, 2012

When compared to Macomb County, the State of Michigan, and the U.S. as a whole, Roseville currently has a significantly higher foreclosure rate (0.39% of units) than all units in comparison. The foreclosure rate in the City of Roseville is more than double the national rate.

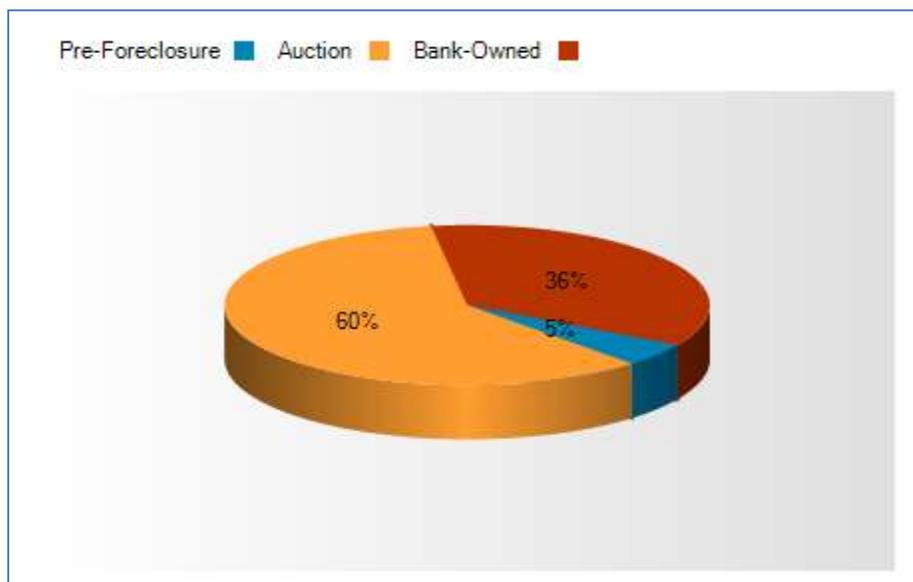
Based on the number of type of foreclosures in Roseville over the last 6-month period, RealtyTrac classifies the foreclosure trend as “Falling.”

Figure 23 - Type of Foreclosure Activity by Month Roseville, Michigan



Source: RealtyTrac, 2012

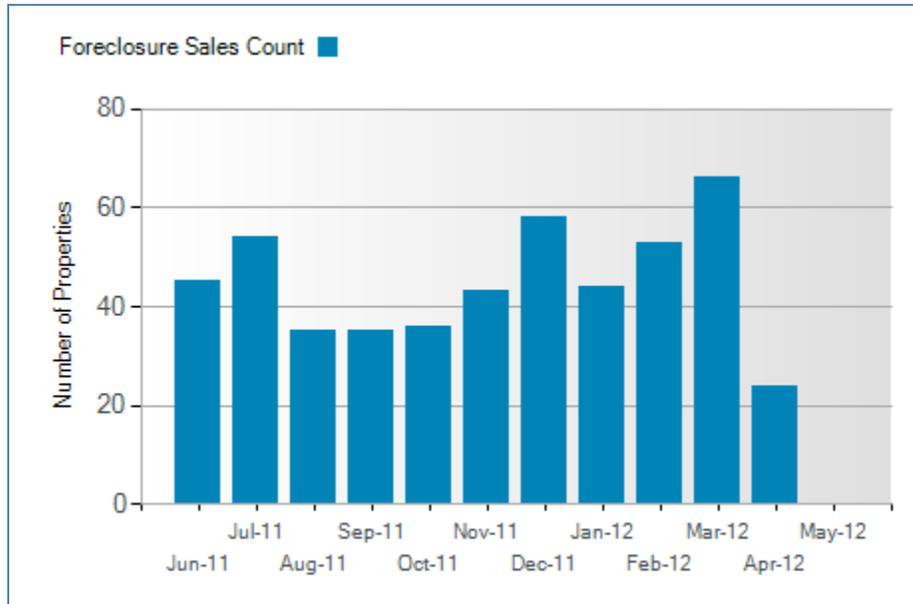
Figure 24 - Foreclosure Status Distribution – City of Roseville



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Source: RealtyTrac, 2012

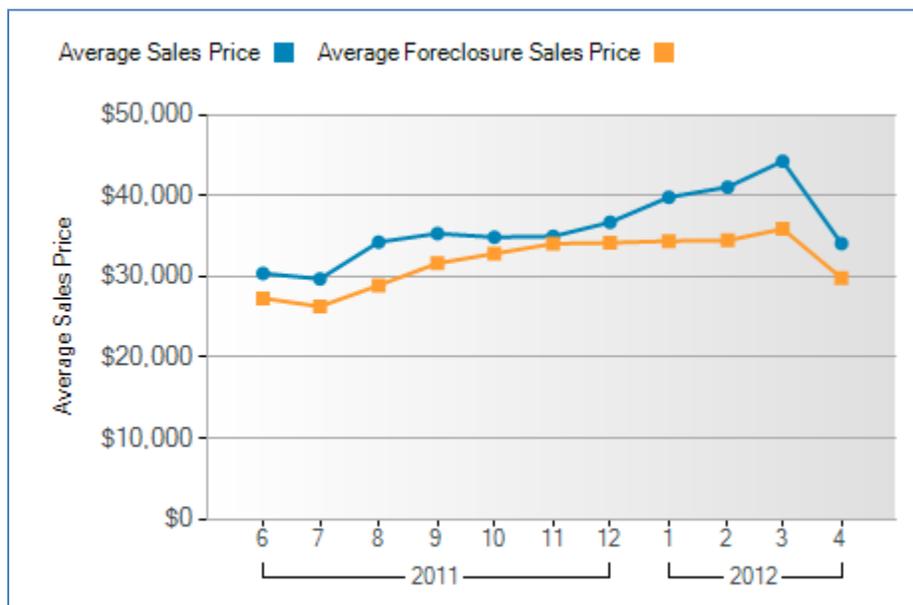
Figure 25 - Foreclosure Sales County Roseville, Michigan



Source: RealtyTrac, 2012

The most recent difference in price between foreclosure and non-foreclosure sales is \$4,257 (13% savings on foreclosed prices) in the City of Roseville.

Figure 26 - Average Sales Price Comparison Roseville, Michigan



Source: RealtyTrac, 2012

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Fair Housing Complaint Data

Citizens of Macomb County who believe they have experienced fair housing discrimination may file their complaints through entities, including but not limited to: the State of Michigan Department of Civil Rights (MDCR); the Fair Housing Center of Metropolitan Detroit (FHC); and the HUD Detroit Office of Fair Housing and Equal Opportunity (FHEO). As part of the AI, these organizations were contacted and requested to provide summary information about cases that had been filed by or against organizations or residents in Macomb County. It should be noted that fair housing complaints may originate at one agency and be referred to a different agency. Therefore, there exists the possibility of some duplicate counting with respect to the basis/type of complaint.

State of Michigan Department of Civil Rights

The Michigan Department of Civil Rights (MDCR) was established in 1965 to provide a staff complement to the policy making responsibilities of the Michigan Civil Rights Commission. MDCR works to prevent discrimination through educational programs that promote voluntary compliance with civil rights laws and investigates and resolves discrimination complaints. It also provides information and services to businesses on diversity initiatives, equal employment law, procurement opportunities and feasibility studies, and joint venture/strategic alliance matchmaking. A complaint may be filed at any of the Department's regional centers or satellite offices, if the alleged discrimination has occurred within the past 180 days.

The table in Appendix 3 illustrates any fair housing complaints involving properties in Macomb County, excluding areas not included in this analysis, as processed by MDCR. The data includes any housing discrimination complaints for 2005 to present.

Fair Housing Center of Metropolitan Detroit

The Fair Housing Center of Metropolitan Detroit (FHCMD) is a non-profit organization that was established in April, 1977 for the purpose of addressing fair housing issues in the metropolitan Detroit area. According to the FHCMD, the organization is available to provide the following services:

- Assist in the investigation of complaints of unlawful housing discrimination.
- Refer some housing discrimination complainants to other agencies or legal resources.
- Initiate negotiation, conciliation, and litigation to help resolve equal housing disputes.
- Provide home seekers with information about the sales and rental market, and assist home seekers who are considering non-traditional housing choices.
- Conduct research projects and housing surveys to evaluate fair housing practices, or assist in industry self-testing programs in sales, rental or mortgage lending markets.

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- Provide consulting and program implementation services to employers, businesses, units of government, and housing providers that are seeking to develop or implement fair housing issues.
- Conduct training and public information programs on fair housing.
- Work with neighborhood groups, community organizations, and other service providers to help promote and achieve more racially and ethnically diverse neighborhoods.

The data in Appendix 4 was provided by FHCMD and consists of FHCMD Discrimination Complaint Activity in Macomb County (excluding areas not included in this analysis) for 2006-2011. Data from the FHCMD does not include the type of resolution/closure for each individual complaint. However, FHCMD does provide yearly data on overall activities for all communities it serves: Wayne County, Oakland County, Macomb County, Out-State Michigan, and other States. The majority of their cases involve the three counties in the Detroit area. This data may give some indication of trends or changes in the metropolitan area, of which Macomb County is part. The following is a summary of yearly data for all communities.

New Complaints

10/01/04 – 09/30/05	125
10/01/05 – 09/30/06	126
10/01/06 – 09/30/07	105
10/01/07 – 09/30/08	96
10/01/08 – 09/30/09	92
10/01/09 – 09/30/10	95

New Complaints that Needed Fair Housing Testing

10/01/04 – 09/30/05	65	52%
10/01/05 – 09/30/06	83	66%
10/01/06 – 09/30/07	60	57%
10/01/07 – 09/30/08	55	57%
10/01/08 – 09/30/09	54	59%
10/01/09 – 09/30/10	51	54%

Tests that Produced Evidence to Support a Claim of Discrimination

10/01/04 – 09/30/05	33	42%
10/01/05 – 09/30/06	52	39%
10/01/06 – 09/30/07	10	23%
10/01/07 – 09/30/08	33	39%
10/01/08 – 09/30/09	45	46%
10/01/09 – 09/30/10	34	37%

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Table 37 -Status of Open Complaints

Reporting Period	# Open Complaints	Under Active FHC Investigation	Referred to HUD/MDCR	Referred to Other Agencies	Referred to Attorney (not filed)	Lawsuit Filed
10/01/04 – 09/30/05	275	225	36	4	0	10
10/01/05 – 09/30/06	275	226	16	3	5	4
10/01/06 – 09/30/07	253	249	16	3	5	4
10/01/07 – 09/30/08	245	214	23	4	1	3
10/01/08 – 09/30/09	135	115	6	5	5	4
10/01/09 – 09/30/10	142	119	7	4	5	7

HUD Detroit Office of Fair Housing and Equal Opportunity

The Detroit Office of Fair Housing and Equal Opportunity (FHEO) is responsible for the investigation of housing discrimination complaints under the federal Fair Housing Act, as assigned, as well as other civil rights complaints related to HUD funded programs in Michigan. Such other complaints may include Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act, and the Age Discrimination Act of 1975, among others.

In addition to helping people who feel they may have been illegally discriminated against, the FHEO staff monitors and provides technical assistance to operators of HUD funded programs to ensure that the various equal opportunity requirements are met. Staff members also work to educate the public and various housing and community development groups on the provisions of fair housing laws, civil rights program requirements and related HUD regulations. The Detroit Office of Fair Housing and Equal Opportunity (FHEO) are responsible for the administration of all FHEO programs in the State of Michigan.

The data in Appendix 5 was provided by FHEO and consists of Discrimination Complaint Activity in Macomb County (excluding areas not included in this analysis) for 2006 - 2011.

The data from the FHEO in the following table shows that cases filed from Macomb County have remained fairly steady from the 2005 through 2011. Except for an increase in 2009 to 34 and a low of 20 in 2007, cases have been stable. Over the last two years of the review period, the number of cases decreased by 13 (38%) from 2009 and was stable for those two years at 21 cases. There is no clear co-relation between the reduction in cases and increased awareness or education.

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Table 38 - Discrimination Cases Filed with HUD per SE Michigan Counties

Violation State & County	CY Filed	2005	2006	2007	2008	2009	2010	CY2011	Total
		Total Filed							
Livingston County					2	3	6	3	14
Macomb County		23	25	20	25	34	21	21	169
Monroe County		2	8	2	2	5	3	1	23
Oakland County		52	45	44	47	72	60	45	365
St. Clair County		5	6	1	1	2	2	8	25
Washtenaw County		9	15	7	14	14	11	15	85
Wayne County		92	174	69	89	108	79	58	669
Total		183	273	143	180	238	182	151	1,350

Legal Cases

According to information from the FHCMD, they have assisted with a total of 399 lawsuits from 09/01/77 to 09/30/10.

Distribution of Lawsuits, 09/01/77 to 09/30/10

Macomb County, MI: 51
 Wayne County, MI: 221
 Oakland County, MI: 106
 Out-State, Michigan: 22
 Other: 3

According to **Volume 34, No. 2 of the Fair Housing News** (June 2012), the newsletter for the Fair Housing Center of Metropolitan Detroit, the following fair housing case was closed:

Lakeridge Condominium Association, Inc. v Lynn Dazer

In November, 2010 Lynn Dazer filed a disability discrimination Counterclaim in opposition to a court action by Lakeridge Condominium Association to evict Ms. Dazer from her unit (see **Fair Housing News**, Vol 33 #1). Lakeridge is located in Harrison Township, Macomb County, Michigan. In her Counterclaim Ms. Dazer alleged that, after allowing her to keep her assistance animal (a dog) since 2004, the Association in 2010 refused to approve her request for a “reasonable accommodation” from their “no pet” policy and took legal action to evict her. FHCMD Cooperating Attorney John Obee, a partner with Wood Kull Herschfus Obee and Kull, has now informed FHCMD that Ms.

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Dazer has accepted a settlement offer from Lakeside that allows her to keep her assistance animal and dismisses the eviction action.

In 2009 Attorney Obee successfully negotiated the settlement of a previous disability discrimination claim against the same defendant (**Lidner and Cambridge v Lakeridge Condominium Association**) in which the Association had taken action against a resident who had a therapy animal, a cat, living with him. Many of the housing provider defendants in the 400+ housing discrimination lawsuits assisted by the FHCMD have not re-appeared as defendants. Occasionally, as in these cases, the FHCMD encounters repeat defendants.

At the date of publication, any additional specific information about legal cases involving properties in Macomb County had not been received.

VI. PUBLIC OUTREACH

Introduction

This section summarizes the results of the surveys, public meetings, and key person interviews conducted as part of the public outreach process for the Macomb County and City of Roseville AI. In addition, this section gives a brief overview of fair housing public outreach conducted by stakeholders in Macomb County. The consultant conducted an online and written survey available to all Macomb County residents and industry stakeholders. The survey asked respondents about their experience and perception of housing discrimination, knowledge of fair housing laws, utilization of Macomb County and each municipality's housing assistance and social service programs, and opinions about housing and social service needs in the county/city. ASK also directly administered surveys, conducted public meetings, and held key person interviews with members of community groups, Macomb County and City of Roseville staff, nonprofit agencies, and area real estate agents.

The consultant developed fair housing surveys for citizens, housing service providers, Realtors, and lending institutions. A flyer was created that included information regarding the survey and the internet address for survey completion. Copies of the flyers were posted in the libraries, on the City of Roseville's website, on the City of Roseville's notice board in City Hall, and at the County's notice board in the Housing and Community Development office. Copies of the flyer were emailed to the cities within Macomb County by email blast.

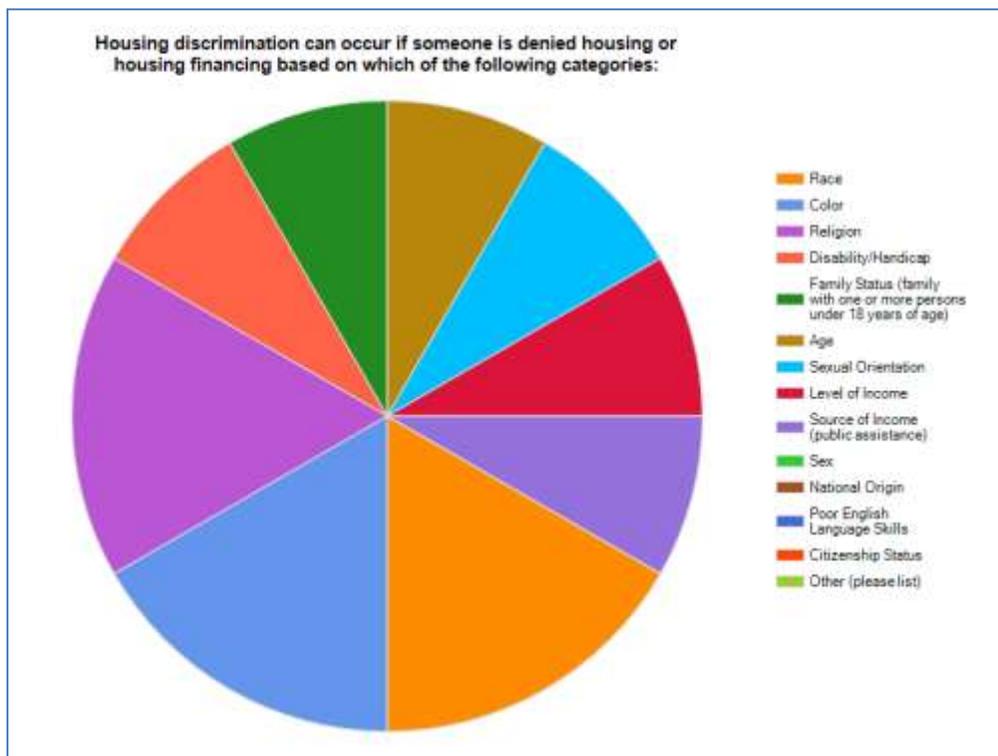
Please refer to the Appendix section of the AI to view the survey instrument. The findings from these activities are discussed in turn.

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Citizen Surveys

An online, 30-question fair housing survey was designed by ASK and available for all residents to complete via <http://www.surveymonkey.com>, and as distributed by Macomb County and City of Roseville staff. The survey was opened in the month of May and available for 3 months. Despite extensive advertisement and notification, at the date of publication, the resident survey was completed online by two residents.

The survey was completed by residents of Roseville who were not members of a protected class under current fair housing law. The survey respondents felt that they were “Somewhat Knowledgeable” regarding fair housing laws (versus “Very Knowledgeable” or “Not Knowledgeable”). The respondents did not know of any instance of housing discrimination in Macomb County, either personally or to someone known. When asked about the situations in which housing discrimination can occur, the answers were as follows.



One survey respondent felt that affordable housing choices were spread throughout Macomb County, although the other felt that Roseville and Warren had the concentrated areas of available, affordable housing. Although one respondent felt that no particular area of Macomb County would be considered undesirable, the other respondent felt that areas of Macomb County were undesirable (but did not specify the areas). When asked what they would do if they were discriminated against in housing choice, the respondents answered that they would do “Nothing” or that they “Would not know what to do.”

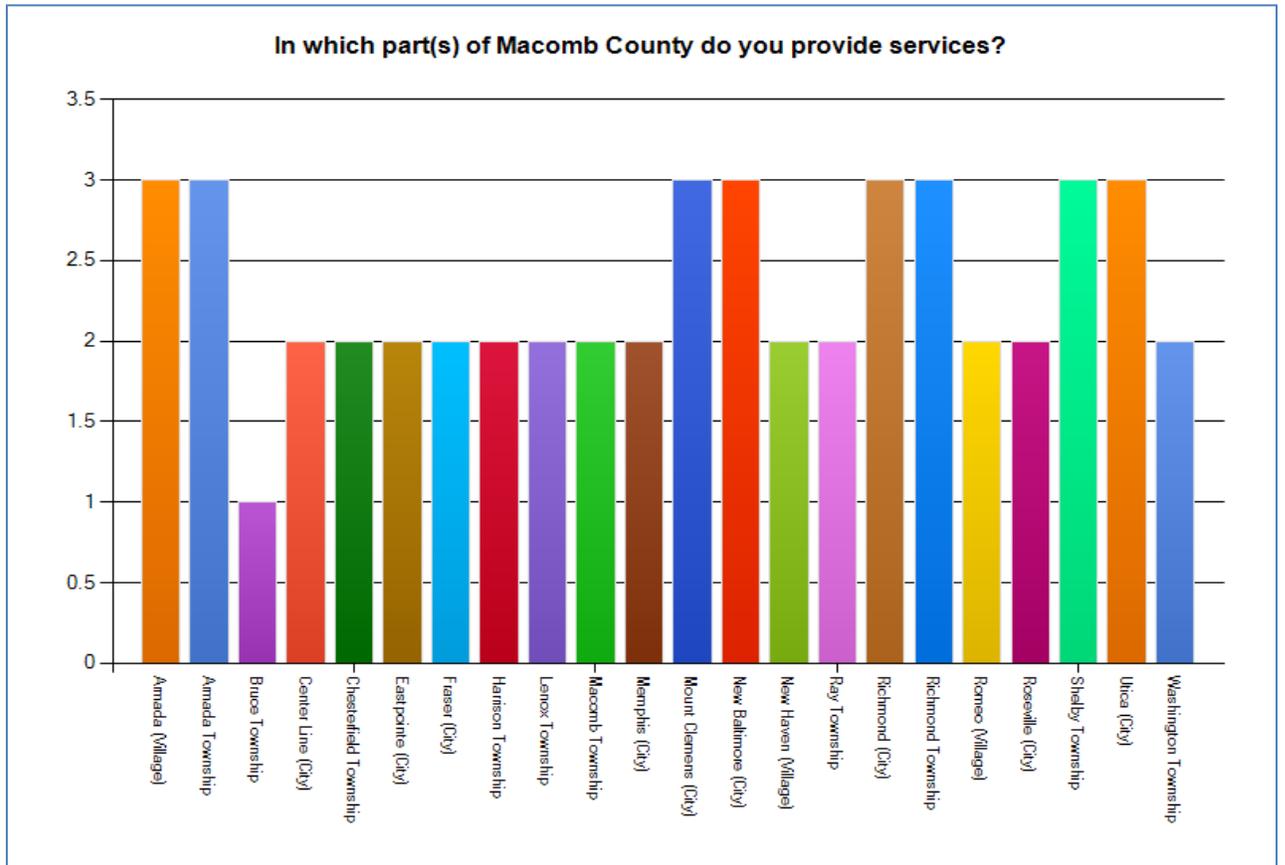
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One survey respondent felt that there was not an adequate supply of affordable housing for disabled residents, but both respondents felt that seniors, families with children, and all other residents had an adequate supply of affordable housing. Survey respondents felt that current fair housing laws and enforcement mechanisms were only “Somewhat Effective” (rather than “Highly Effective” or “Not Effective”), and that there was inadequate fair housing information available in other language translations.

Service Provider Surveys

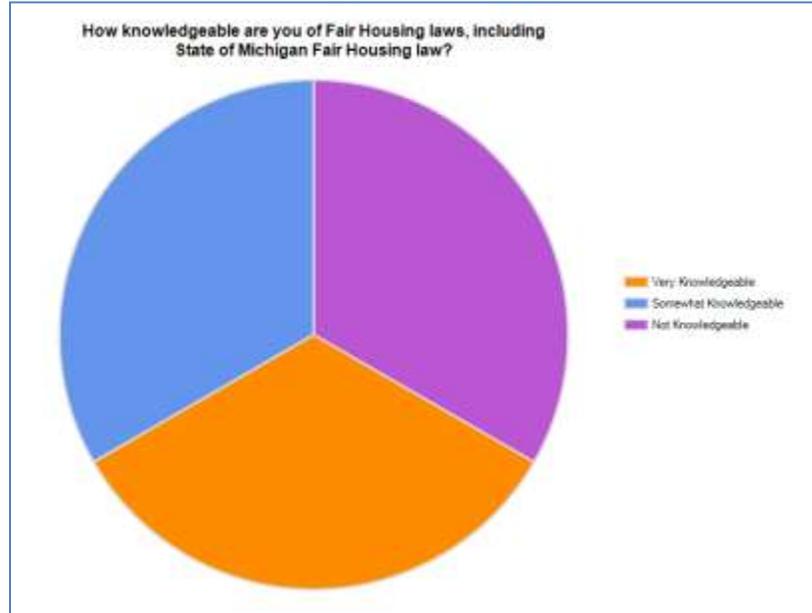
Additional online surveys and questionnaires were created for Housing Service Providers, Realtors, and Lending Institutions in the Macomb County area via <http://www.surveymonkey.com>. These surveys were open in the month of May and links were sent to area service providers, Realtors, and lenders. At the time of publication, six (6) surveys had been completed by Macomb County service providers. A 20-question survey was developed for services providers in the City of Roseville and Macomb County. After extensive advertisement and promotion by County and City staff, the survey received 6 responses. The following information is a detailed look at fair housing from the perspective of service providers throughout Macomb County.

Survey respondents serve large part of the County, covering every municipality included within this analysis.

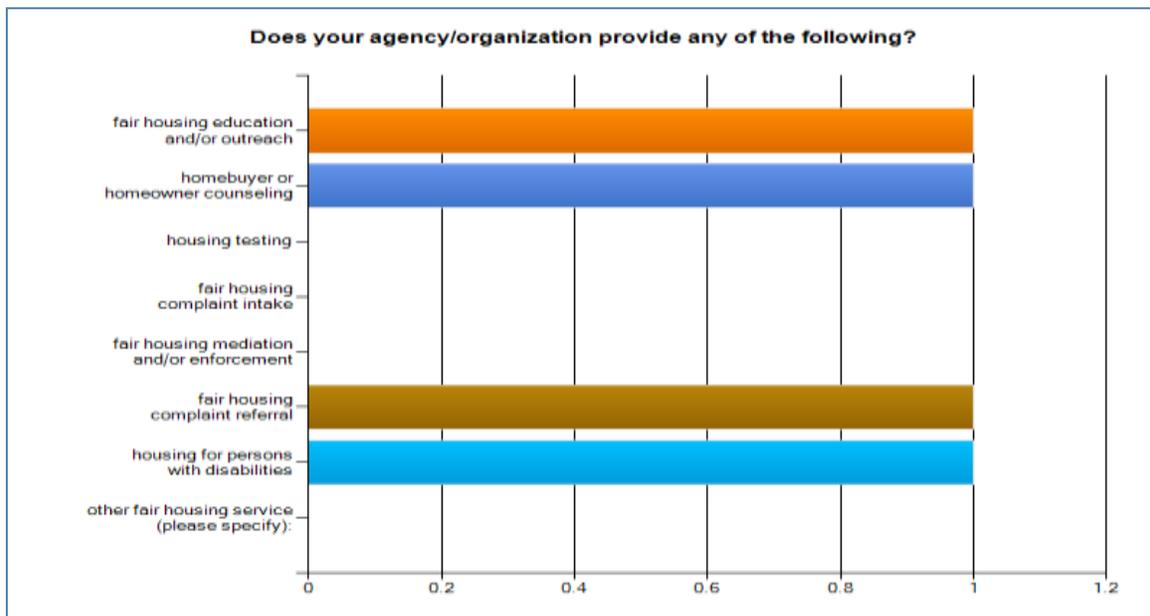


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Survey respondents were evenly divided in their knowledge of fair housing laws. All respondents felt that current fair housing laws and enforcement mechanisms were “Somewhat Effective” (versus “Highly Effective” or “Not Effective”). All were in agreement regarding the current need for fair housing education in Macomb County.



Only a few survey respondents indicated that their organization was directly responsible for providing fair housing services.



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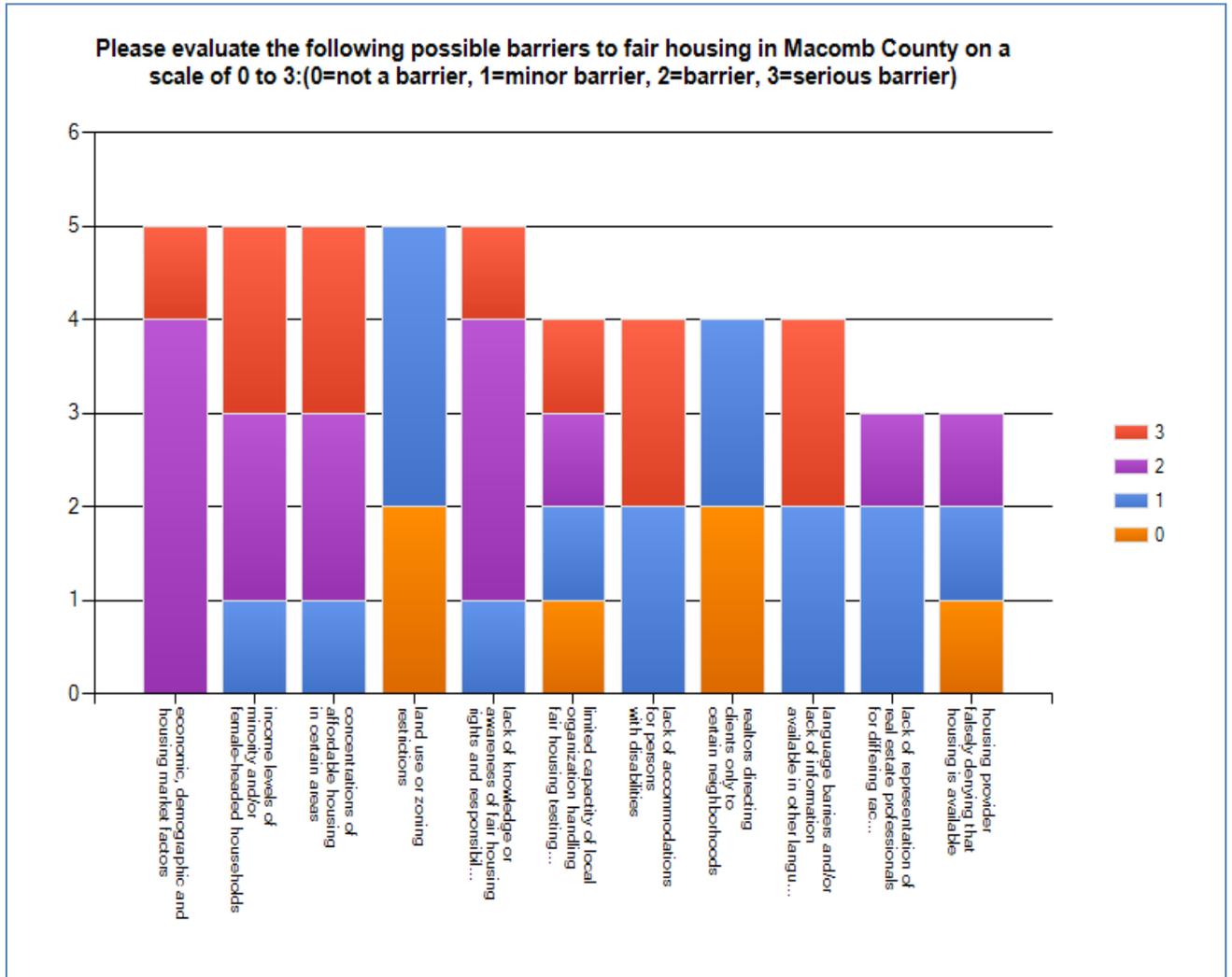
Two (2) survey respondents were aware of current impediments to fair housing choice in Macomb County. They gave the following information regarding their answer:

- It is difficult for individuals with criminal records to access housing.
- Mount Clemens/Clinton Township have received push back on developments with individuals with special needs without just reasoning.

Survey respondents were asked to evaluate barriers to fair housing for relevance and severity. Several categories were deemed to be “serious barriers” by the respondents, including:

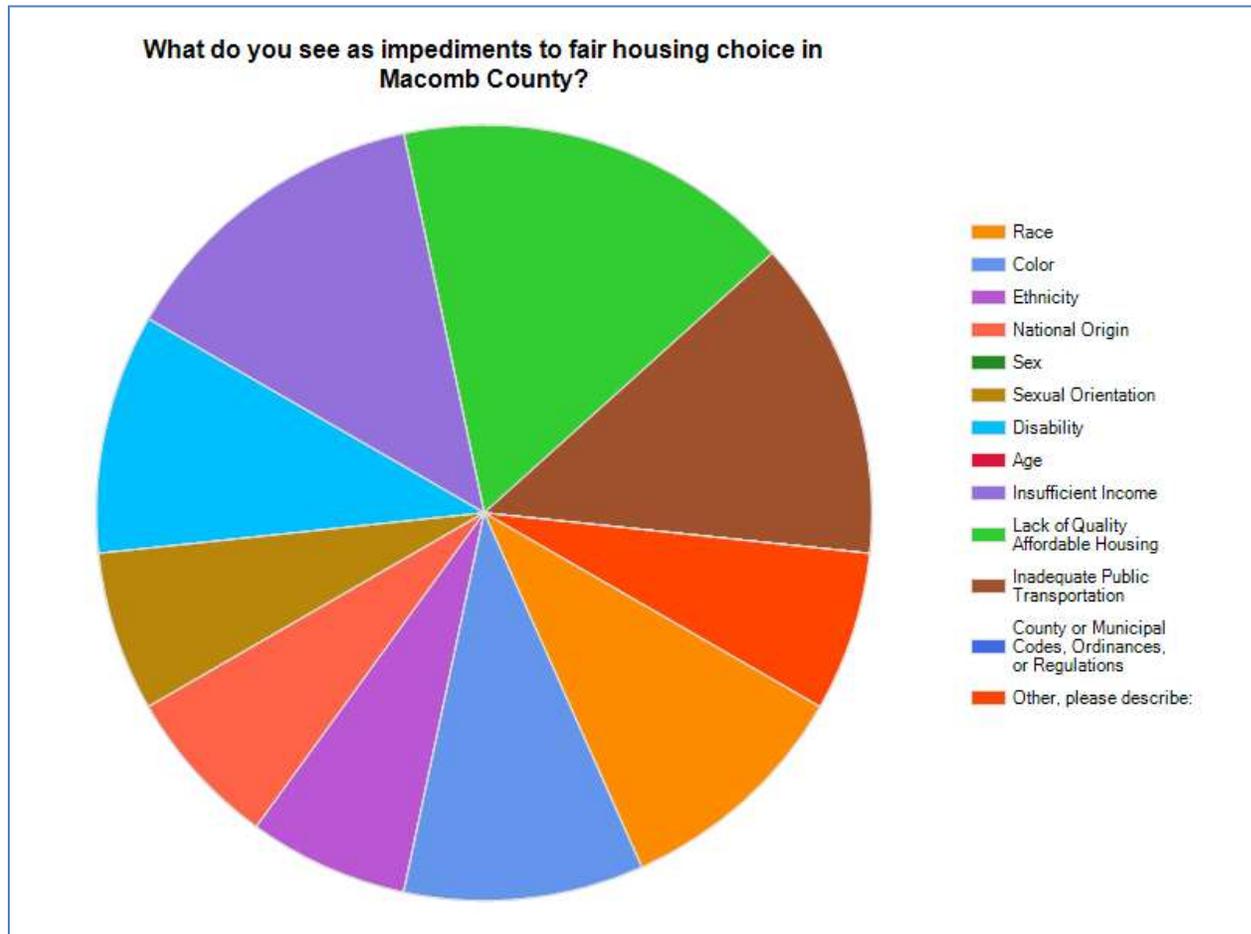
- Economic, demographic, and housing market factors;
- Income levels of female-headed households;
- Concentration of affordable housing in certain areas;
- Lack of knowledge or awareness of fair housing rights and responsibilities;
- Limited capacity of the local organization handling fair housing testing and investigation;
- Lack of accommodations for persons with disabilities; and
- Language barriers and/or lack of information available in other languages.

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Survey respondents were also asked to consider the Macomb County population and housing market factors to determine which fair housing choice impediments currently existed.

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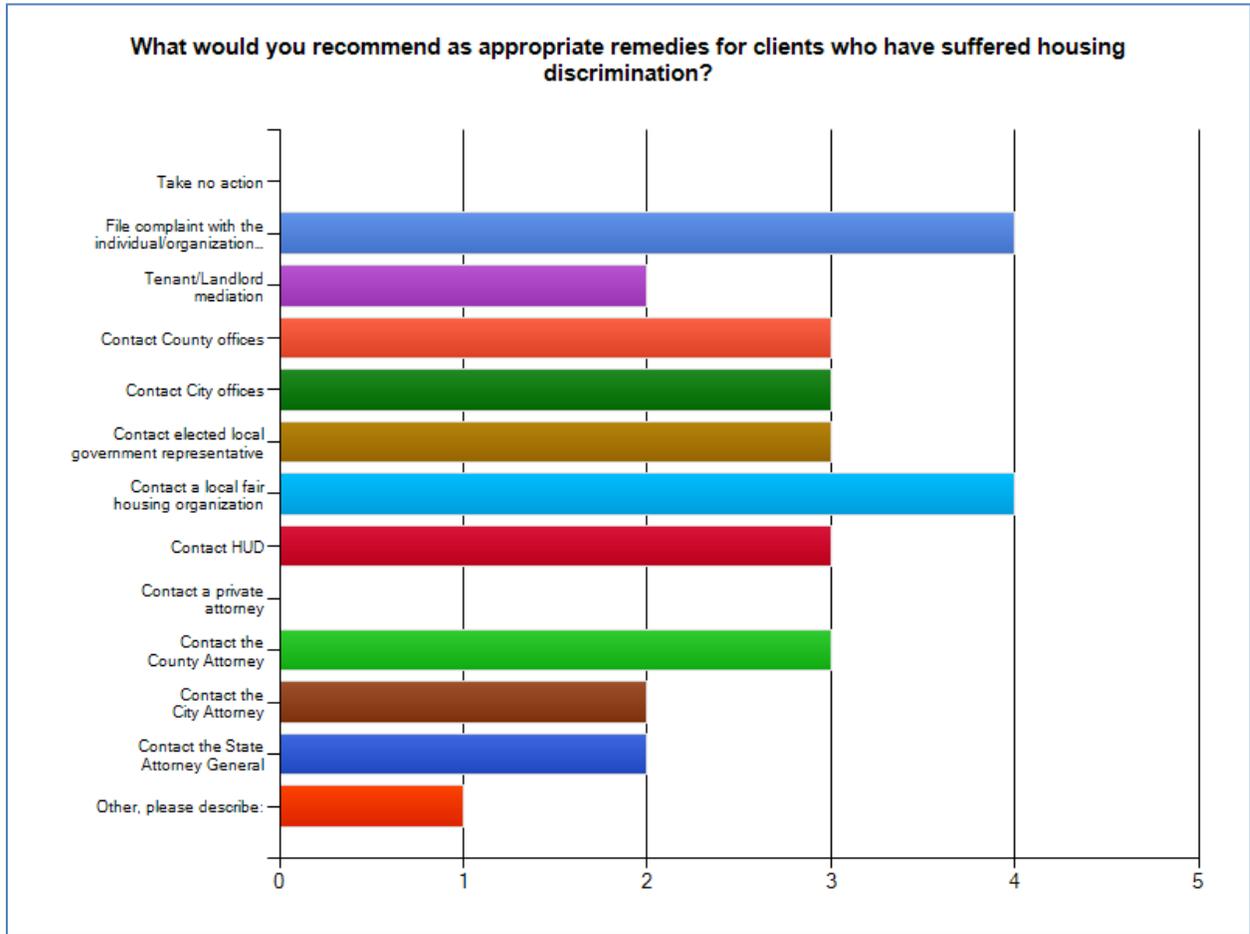
When asked about housing choices in Macomb County, most respondents felt that there were housing choices spread throughout the County. Some respondents, however, did feel that choices were actually geographically limited due to housing affordability and transportation issues.

Over half of the respondents felt that certain geographic areas of Macomb County were considered to be undesirable. The areas deemed undesirable were listed by respondents, as follows:

- Warren, Eastpointe, Roseville, Mt. Clemens.
- Southern portion of the County.
- The lower portion of the County (which borders the City of Detroit), including Warren, Eastpointe, and Roseville.

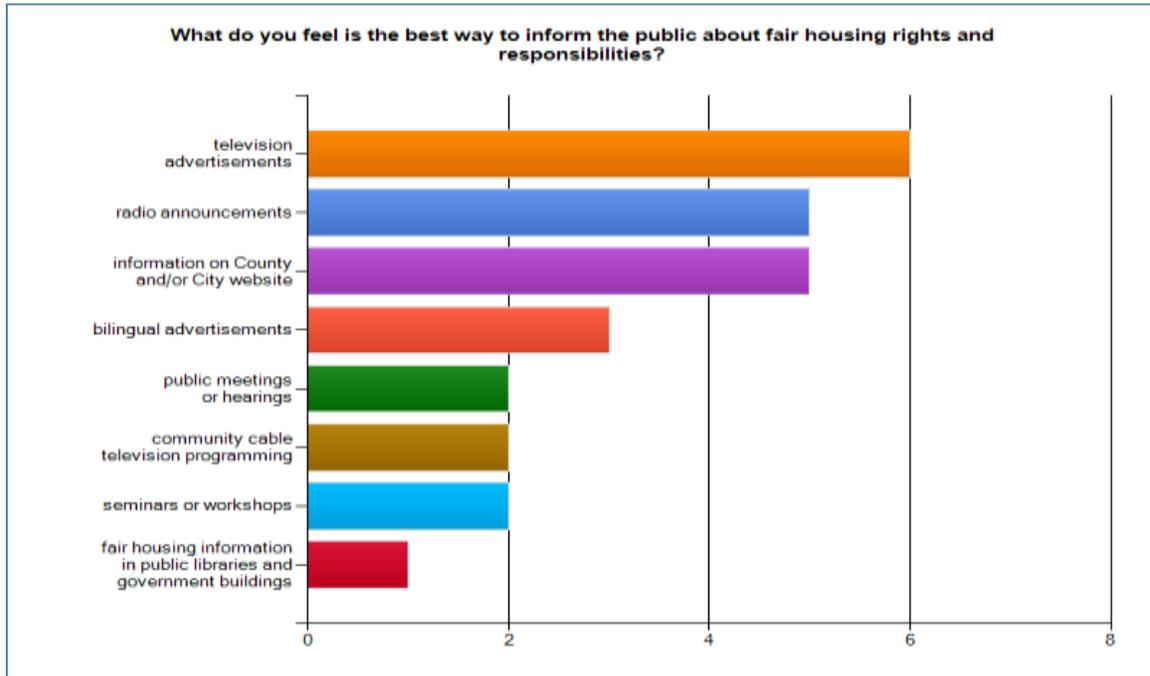
Survey respondents gave a variety of answers when asked about the appropriate reaction to housing discrimination, as seen the following chart. The one written-in response listed contacting Legal Aid as an appropriate response to housing discrimination.

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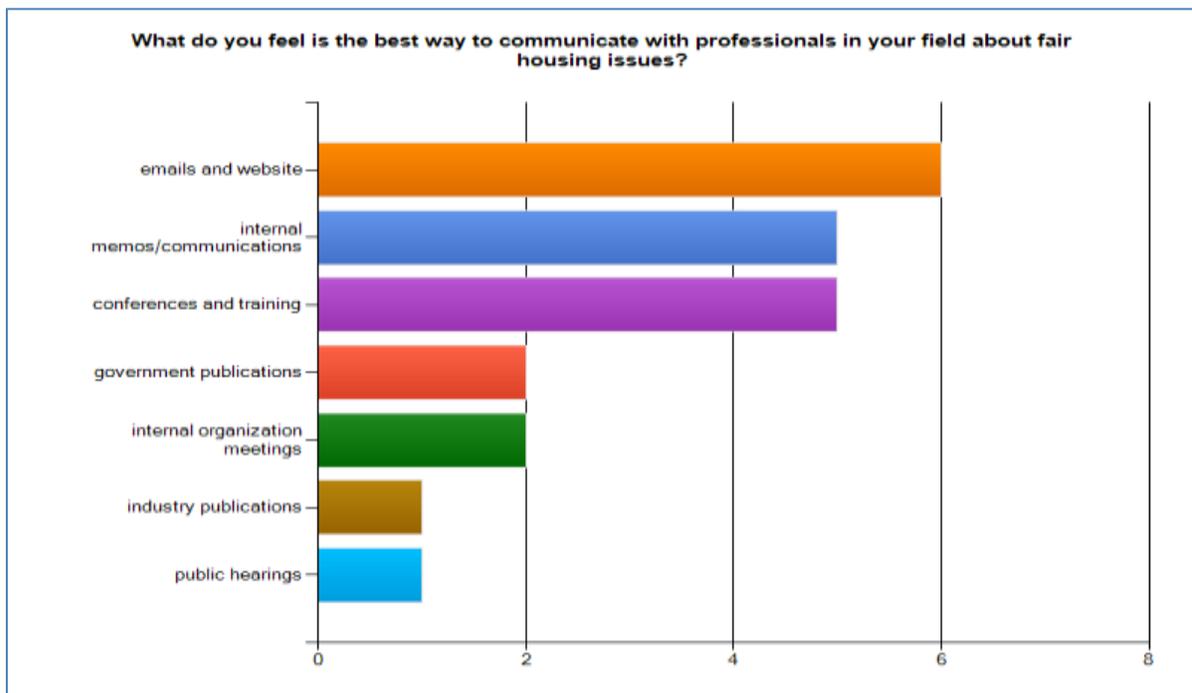


Survey respondents indicated what ways they felt would be the most effective for educating the public regarding fair housing, as seen below. Television advertisement was the most popular choice for fair housing educations, followed by radio announcements and information being posted on City and County websites.

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The survey respondents were also asked what they felt was the best way to communicate with other professionals about fair housing issues. All respondents felt that emails and website communication ranked highest, followed by conferences/training and internal memos/communications.



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Key Person Interviews

In conjunction with the surveys, ASK conducted key person interviews person-to-person, by teleconference, and via email correspondence with members of the Macomb County and City of Roseville Staff, for-profit, nonprofits and advocacy groups.

Macomb County and City of Roseville	Key Person
Macomb County	Mike Rozny
City of Roseville	Michael Connors

Public Meetings and Community Outreach

Members of the general public, as well as representatives of various community groups were invited to attend public input meetings. Public meetings were held on June 21 in northern Macomb County and in the City of Roseville for the southern part of the county. The meetings were advertised on the City's and County's website, posters, and email distribution. Both meetings did not have any attendees.

Public Input for Completion of the AI

On December 5, 2012, the final AI document was placed on both the websites of Macomb County and the City of Roseville for a public comment period until January 11, 2013. Copies of the AI were also provided at the Macomb County and City of Roseville offices and at the public libraries. No public comments were received.

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VII. FAIR HOUSING IMPEDIMENTS AND RECOMMENDATIONS

Previously Identified Impediments and Recommendations

Macomb County and the City of Roseville’s previous Analyses of Impediments to Fair Housing provided recommendations for actions that the County and City could take to reduce impediments to fair housing choice. This section provides a matrix of the previously recommended actions from the 2005 Analyses, and provides an update on the current status (as provided by the County and City).

Macomb County, Michigan - Analysis of Impediments to Fair Housing Choice, 2005 Summary of Impediments and Action Plan

Impediment	Strategy to Meet Goal	Current Status	\$ Invested	Still An Impediment ? (yes/no)
<p>Although Macomb County and its CDBG communities are becoming more racially and ethnically diverse, each should take more concrete steps to continue this trend including steps to identify and counter negative responses to the growing minority population in the County. The steps taken should be publicly acknowledged and further promoted.</p>	<p>The AI recommended that the County and CDBG communities take concrete steps to respond more positively to this diversity including:</p> <ul style="list-style-type: none"> • Steps to identify and counter negative community responses to the growing presence of African American, Hispanic American, Asian American, Native American and persons with disabilities in Macomb County. • The MDCR, HUD, DOJ, the Macomb County Ministerial Alliance, Macomb County NAACP, and many other public and private groups are available to assist the County and their advice and services should be used by the County. 	<p>There haven’t been any noticeable negative responses to growing minority populations in the County. There has been a significant growth along the southern tier of communities and the County has responded by increasing investment in housing and community development programs in the affected communities.</p>		<p>Yes</p>
<p>African-American and disabled residents are under-represented in the general population. The</p>	<p>The AI recommended that the County conduct a study of real estate practices and a study of home seeking choices</p>	<p>Although the County did not undertake the suggested study, it did use its resources to provide</p>		<p>Yes, but diminishing.</p>

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Impediment	Strategy to Meet Goal	Current Status	\$ Invested	Still An Impediment ? (yes/no)
County should study real estate practices, and the home-seeking choices made by those groups, to determine the extent of perceived or actual unlawful discriminatory practices.	among African American and persons with disabilities to seek to determine to what degree perceived, or actual, practices of unlawful housing discrimination are serving as impediments to the exercise of fair housing choice in Macomb County.	housing opportunities (ADDI, NSP and HOME) to minority homebuyers in various non-minority areas of the County. This resulted in Federally-assisted homebuyers locating in those communities.		
There are home-seekers who believe that they have experienced unlawful discrimination, and continued use of the offices of the Michigan Department of Civil Rights, HUD, and particularly the Fair Housing Center (with its ability to test for discriminatory practices) is warranted.	Continued use of the investigative services of the MDCR to assist in the investigation and resolution of housing discrimination complaint activity. Since FRC is the only organization that includes fair housing "testing" as part of its complaint investigation program, contracting with FHC for assistance in the investigation of complaints of unlawful housing discrimination involving properties or firms doing business in the Macomb County communities is warranted.	The county Funded Legal Aid and Defender to provide fair housing services, including testing, in the Village of Romeo.	\$500	Yes, but diminishing.
The AI has identified a number of Macomb County and Macomb County CDBG community public policies that warrant review and/or correction in order to help ensure that the policies affirmatively further fair housing and are not impediments to the exercise of fair housing choice.	Several community Master Plans and Zoning Ordinances should be reviewed and/or corrected to ensure that they do not become impediments to fair housing. The County should work with its CDBG communities to achieve this end.	The County, through its Planning function, reviews community master plans and has offered suggestions for improvements. Notable among them is a ground-breaking study of an aging population. Recommendations for change have been forwarded to all communities.	\$25,000	Yes, but diminishing.
CDBG Regulations state that recipients of CDBG funds are to report to HUD any activities they have taken to affirmatively further fair housing.	The County should fully report impediments to fair housing and any activities taken to affirmatively further fair housing, as required by Program regulations.	Duly reported to HUD in the County's Consolidated Annual Performance and Evaluation Report (CAPER).	\$500	N/A

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Macomb County

The PY 2010 – 2011 Consolidated Annual Performance and Evaluation Report (CAPER) for Macomb HOME Consortium and Macomb Urban County indicated that the County updated its Analysis of Impediments to Fair Housing on January 15, 2005, and that a new analysis will be developed during program year 2011. The CAPER summarized the 2005 conclusions and provided information on the actions taken during the program year to address those conclusions:

- It was concluded that although Macomb County and its CDBG communities are becoming more racially and ethnically diverse, each should take more concrete steps to continue this trend including steps to identify and counter negative responses to the growing minority population in the County. The steps taken should be publicly acknowledged and further promoted.
 - Action Taken: The County developed informational brochures to promote mutual understanding. The brochures will be used by business and community leaders to improve the business climate, welcome newcomers, facilitate harmony between ethnic communities and promote Macomb County as a desirable place to live and conduct business regardless of whom one might be.
- African-American and disabled residents are under-represented in the general population. The county should study real estate practices, and the home-seeking choices made by those groups, to determine the extent of perceived or actual unlawful discriminatory practices.
 - Action Taken: The Consortium promoted housing primarily for disabled adults by awarding HOME funds to Springhill Housing Corporation, to acquire and rent affordable units to LI primarily developmentally-disabled individuals. An estimated 57 income-eligible households will be directly assisted through the Neighborhood Stabilization Program. Additional residents are expected to be assisted with program income. A number of residents are minority.
- There are home-seekers who believe that they have experienced unlawful discrimination. The continued use of the Michigan Department of Civil Rights, HUD, and particularly the Fair Housing Center (which can undertake testing for discriminatory practices) is warranted.
 - Action Taken: The County contributed \$500 to the Fair Housing Center during the summer of 2009. Funds were expended during 2010. It also provided CDBG assistance to the Legal Aid and Defender Association, its first year of CDBG funding.
- Several community Master Plans and Zoning Ordinances should be reviewed and/or corrected to ensure that they do not become impediments to fair housing. The County should work with its CDBG communities to achieve this end.
 - Action Taken: The County has an advisory role, but little control over local planning issues. The County believes that its input can be valuable. MCPED completed a study of the County's aging population to identify building design and other practices to promote independent living for elderly people.
- The County should fully report impediments to fair housing and any activities taken to affirmatively further fair housing, as required by program regulations.
 - Action Taken: The County indicated that it is reporting those actions, as described in the CAPER.
- Additional Actions Taken Described in the 2010 -2011 CAPER:
 - In 2006 a HOME Consortium was created enabling 3 additional communities to provide affordable housing in ways that were previously not available. As a

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result, transitional housing for homeless families, permanent housing for individuals with developmental disabilities and new homes built by Habitat for Humanity are now available. It is expected that many beneficiaries will be minority households. During the program year, over 20 minority households benefitted from these three programs.

- The County developed, published, and distributed brochures, one per racial and/or ethnic group, detailing the need for, and benefits to be derived by, a diverse, welcoming community. The Michigan Department of Civil Rights was complimentary of this effort
- The County supports the Continuum of Care with financial and other resources at all levels. In 2010, 46% of those assisted by the CoC member organizations were minorities.
- Macomb County updated its AI.

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**City of Roseville, Michigan
Analysis of Impediments to Fair Housing Choice, 2005
Summary of Impediments and Action Plan**

Impediment	Strategy to Meet Goal	Current Status	\$ Invested	Still An Impediment? (yes/no)
The representation of most racial minority groups in Roseville is disproportionately low compared to the representation that would be expected given minority representation in the metropolitan area as a whole. Thus, the demographic pattern in Roseville is not similar to the demographic pattern in the Detroit Metropolitan Area.	The City of Roseville should have paired testing conducted annually for the purpose of determining the extent of discrimination by race in the rental housing industry.	According to SEMCOG data, from 2000-2010, Black, Asian, Multi-Racial, and Hispanic populations increased in population over this time period. Black populations grew 9.1%, Multi-Racial 1% and Hispanic also grew .5%. Increased paired testing would benefit the city's overall compliance goals.		Yes, but diminishing
Blacks, Asians, and Hispanics are underrepresented in Roseville compared to their representation in Wayne, Oakland, and Macomb Detroit Metropolitan Area. However, the representation of American Indians in Roseville is similar to their representation in the Detroit Metro Area.	The City of Roseville's Housing Commission should review and monitor, on an annual basis, its residency preference policy to ensure that it does not indirectly create an impediment to fair housing for racial minorities. The city is 92.3% white and minority residents are under-represented.	The PHA residency preference policy is open to all individuals who live or work (20 hours gainful employment) is given preference. The current Section 8 wait list is current 2,451, with 67 local residents. Minorities represent 86% of the applicant wait list. The city is 83.1% white and minority American Indian representation is higher than in Detroit Metro Area.		Yes, but diminishing
Roseville has a lower percentage of female-headed households (with children under 18) than the 3-county metro area.		2000-2010 Census change; 2010 female-head households 17.4%, as compared to 12.7% in 2000. This represents a 31% increase.		
The representation of the foreign-born population in Roseville is not similar to the diversity of the foreign-born population represented in the metro area as a whole. Half of Roseville's foreign-born population		According to 2010 Census, foreign born population in Roseville is 4.9%, as compared to 9.5% in the Detroit metro area.		

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is from Europe, compared to only 1/3 of the foreign-born population in the metro area.				
Blacks are the most residentially segregated racial minority group in Roseville. The index of dissimilarity (0 to 100) is 57.5 between blacks and whites in Roseville. An index above 50 is considered high.	The City of Roseville’s Housing Commission should expand its policy of encouraging tenant mixing by income to include tenant mixing by race-ethnicity. This would advance its de-concentration goals.	2010 Index shows 31.2, a fairly low level of segregation.		Yes, but diminishing
There was a significant increase in American Indian/Alaskan Native segregation, from an index of 24.2 in 1990 to 50.1 in 2000.				
It appears that the differences in median household income, housing value, or gross rent do not sufficiently explain racial minority under-representation in Roseville.	The City of Roseville’s Housing Commission should develop a database to track Section 8 voucher holders by race and census tract of residential location. This will enable the Housing Authority to determine whether it is meeting its obligation to ensure that minority vouchers holders are not restricted to high minority, concentrated poverty census tracts.	The Section 8 voucher service area is a large area from Macomb County communities including the Cities of Warren, Centerline, St. Clair Shores, Fraser, Mount Clemens, Eastpointe, Sterling Heights, Clinton and Harrison Township and is integrated into these communities with scattered-site rental units. These are not tracked by CT, but by demographics. Current Section 8 Voucher recipients are tracked and are 53% minority.		Yes, but diminishing
Discrimination in rental housing based on race was the most prevalent complaint in Roseville 1988-2003.	The City of Roseville’s Housing Commission should specify in written detail what assistance the Roseville’s Housing Authority will provide to those households who wish to search for housing in non-impacted (i.e., neighborhoods outside of high poverty)	The area serviced by Section 8 Voucher program is a large area in southern Macomb County. The PHA serves as a resource network for apartment listings, housing resources for persons seeking housing assistance. The City of Roseville CDBG Department also serves as a point of		Yes, but diminishing. Can be improved with service delivery and awareness

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	<p>high minority areas. The assistance may include, but not be limited to the following:</p> <ul style="list-style-type: none"> (a) Developing and distributing a list of available rental housing in all census tracts (neighborhoods) in Roseville and surrounding areas; (b) Counseling related to the rental housing search process; (c) Formal discussions with potential apartment managers who may participate in the voucher program; and (d) Distributing information to voucher holders about the services provided by the Metropolitan Detroit Fair Housing Center. 	<p>contact for services to all residents.</p>		
<p>An assessment of the city’s Master Plan and Zoning Ordinance revealed:</p> <ol style="list-style-type: none"> 1. The Master Plan does not state as specific goals that the city will provide a range of choices in housing styles and encourage a variety of housing types and equal opportunity. 2. The Master Plan does not make specific reference to the effect that the city seeks to encourage (a) the development of suitable housing for low and moderate income households; (b) housing for senior citizens; and (c) housing with an emphasis on 	<p>The City’s Master Plan should be revised to <u>explicitly</u> state the Plan’s goals related to fair housing. It should explicitly state its goals related to the development and encouragement of affordable housing, e.g., moderate and low income housing for the elderly and people with disabilities.</p> <p>The City’s Zoning Ordinance should be amended to specifically require that membership on the Planning Commission and the Zoning Board of Appeals have broad and diverse representation, e.g., males-females, white-nonwhite, elderly-nonelderly,</p>	<p>ZBA – Members of City Council not amended.</p> <p>Minorities currently serve on the City Planning Commission.</p>		<p>Yes, but diminishing.</p>

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<p>structural design that will minimize barriers to mobility for people with disabilities.</p> <p>3. The zoning ordinance does not have a policy that requires diverse representation on the Planning Commission and the Zoning Board of Appeals.</p>	<p>people with disabilities – that reflects the diversity of the city’s population.</p> <p>The City should amend its Zoning Ordinance to create a separate Zoning Board of Appeals from that of the City Council in order to ensure that the Zoning Board of Appeals has greater diversity in its membership. It should use appointment of members if necessary.</p>			
	<p>The City of Roseville’s Housing Commission should review and monitor, on an annual basis, its policy on “verification of suitability for admission” to ensure that impediments to fair housing are not occurring.</p>	<p>Verification is reviewed on an annual basis; PHA data is also reviewed by the HUD Field Office on an annual basis.</p>		
	<p>The City of Roseville’s Housing Commission should review its Section 8 voucher allocation process to see why no Hispanic households are voucher holders. It should determine whether any applications were received and rejected or whether and why no Hispanic households applied. After the review, it should re-examine its present outreach program to ensure that advertising in minority publications, media, and minority newspapers adequately includes and targets Hispanics.</p>	<p>3 Hispanic persons are currently Section 8 Voucher holders. The Roseville Housing Commission utilizes the local C&G Newspaper and the Macomb Daily when making public hearing/outreach communications. When the Section 8 list was opened, applicants applied from as far away as Las Vegas, Nevada.</p>		<p>Yes, but diminishing.</p>

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City of Roseville

The City of Roseville Consolidated Annual Performance and Evaluation Report (CAPER) for FY 2010-11 stated that the City continued to support local and regional initiatives designed to address impediments to fair housing choice. According to the CAPER impediments in the City are in the areas of rental housing, homeownership, special needs housing, and financial assistance. Areas of special concern include the costs of market rate apartments and single-family homes, tenant and landlord communication, insufficient transitional special needs housing, limited affordable handicapped accessible apartments and single-family homes.

The City explained that it works closely with local, state, and federal agencies to promote awareness of fair housing issues in Macomb County. The city has addressed transitional housing needs through the Macomb County Continuum of Care Plan. A HOME grant for \$565,000 was allocated to Solid Ground, Inc., a forty bed transitional housing shelter. In addition, the Michigan State University Extension Service regularly offer homebuyer education classes. Applicants with credit problems are assisted in budgeting and credit repair. Existing homebuyers in danger of mortgage default are referred to housing counselors. According to the CAPER, the city undertook the following actions to further fair housing:

- Continued strategic redevelopment of vacant, foreclosed homes in target areas of the city with the use of NSP1 funding through the Michigan State Housing Development Authority. Provided eight first time low/mod homebuyers with attractive, energy efficient homes.
- Created attractive affordable housing options for first-time low-income homebuyers, most of whom are minority households, by demolishing blighted structures with NSP1 funds and developing affordable single-family housing within the Macomb Gardens Subdivision.
- Coordinated resources and programs that are available to the homeless special needs population in the City by referring clients to the Macomb Homeless Coalition and non-profit public agencies for assistance.

The City has not invested any funding for fair housing activities and services due mainly to reduced human and financial resources in carrying out its community development programs. As noted above, the City of Roseville made efforts to address the impediments identified in the last AI. However, the status report also notes that the impediments still remain and need to be addressed along with any impediments identified through this AI.

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Actions Still Required To Resolve Previous Impediments

The Macomb County and City of Roseville AIs outlined actions for addressing the impediments that were identified then. Although some actions were initiated, additional steps are needed to fully address the previous impediments. Some of the identified impediments were unclear and as such may have been difficult to implement. Limited human and financial resources occasioned by the government layoffs, furloughs, and reduced services may have also contributed to the difficulty in implementing the actions. The following section will review the previous impediments from 2005 AIs and the recommended actions; provide a status of actions taken and if necessary, provide an updated recommendation, if the impediment has not been adequately addressed. Some of the actions in this AI will assist in resolving previous impediments. The following is a separate review for Macomb County and the City of Roseville:

MACOMB COUNTY

Previous Impediment #1: Although Macomb County and its CDBG communities are becoming more racially and ethnically diverse, each should take more concrete steps to continue this trend including steps to identify and counter negative responses to the growing minority population in the County. The steps taken should be publicly acknowledged and further promoted.

Strategy:

The AI recommended that the County and CDBG communities take concrete steps to respond more positively to this diversity including:

- Steps to identify and counter negative community responses to the growing presence of African American, Hispanic American, Asian American, Native American and persons with disabilities in Macomb County.
- The MDCR, HUD, DOJ, the Macomb County Ministerial Alliance the Macomb County NAACP, and many other public and private groups are available to assist the County and their advice and services should be utilized by the County.

Status:

According to the County, there haven't been any noticeable negative responses to growing minority populations in the County. There has been a significant growth along the southern tier of communities and the County has responded by increasing investment in housing and community development programs in the affected communities. The County developed informational brochures to promote mutual understanding. The brochures will be used by business and community leaders to improve the business climate, welcome newcomers, facilitate harmony between ethnic communities and promote Macomb County as a desirable place to live and conduct business regardless of whom one might be.

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Updated Recommendation:

It is recommended that the County prepare additional informational brochures in different languages and include Fair Housing information including whom to contact to file a fair housing complaint to be posted in their website.

Previous Impediment #2: African-American and disabled residents are under-represented in the general population. The County should study real estate practices, and the home-seeking choices made by those groups, to determine the extent of perceived or actual unlawful discriminatory practices.

Strategy:

- The AI recommended that the County conduct a study of real estate practices and a study of home seeking choices among African American and persons with disabilities to seek to determine to what degree perceived, or actual, practices of unlawful housing discrimination are serving as impediments to the exercise of fair housing choice in Macomb County CDBG communities.

Status:

Although the County did not undertake the suggested study, it did use its resources to provide housing opportunities (ADDI, NSP and HOME) to minority homebuyers in various non-minority areas of the County. This resulted in Federally-assisted homebuyers locating in those communities.

Updated Recommendation:

It is recommended that the County undertake Fair Housing Education to include lending institutions, realtors, and the general public; and to continue to use its resources to provide housing opportunities to minority residents and disabled persons.

Previous Impediment #3: There are home-seekers who believe that they have experienced unlawful discrimination, and continued use of the offices of the Michigan Department of Civil Rights, HUD, and particularly the Fair Housing Center (with its ability to test for discriminatory practices) is warranted.

Strategy:

Continue to use of the investigative services of the MDCR to assist in the investigation and resolution of housing discrimination complaint activity. Since FRC is the only organization that includes fair housing "testing" as part of its complaint investigation program, contracting with FHC for assistance in the investigation of complaints of unlawful housing discrimination involving properties or firms doing business in the Macomb County CDBG communities is warranted.

Status:

The county Funded Legal Aid and Defender to provide fair housing services, including testing, in the Village of Romeo.

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Updated Recommendation:

It is recommended that the County allocates additional funding to undertake and expand fair housing services, including testing, subject to availability of funding.

Previous Impediment #4: The AI has identified a number of Macomb County and Macomb County CDBG community public policies that warrant review and/or correction in order to help ensure that the policies affirmatively further fair housing and are not impediments to the exercise of fair housing choice.

Strategy:

Several community Master Plans and Zoning Ordinances should be reviewed and/or corrected to ensure that they do not become impediments to fair housing. The County should work with its CDBG communities to achieve this end.

Status:

The County has an advisory role, but little control over local planning issues. The County believes that its input can be valuable. MCPED completed a study of the County's aging population to identify building design and other practices to promote independent living for elderly people. The County, through its Planning function, reviews community master plans and has offered suggestions for improvements. Notable among them is a ground-breaking study of an aging population. Recommendations for change have been forwarded to all communities.

Updated Recommendation:

The County should continue to educate its participating municipalities and HOME Consortium in Fair Housing and ADA requirements.

Previous Impediment #5: CDBG Regulations state that recipients of CDBG funds are to report to HUD any activities they have taken to affirmatively further fair housing.

Strategy: The County should fully report impediments to fair housing and any activities taken to affirmatively further fair housing, as required by Program regulations.

Status: Duly reported to HUD in the County's Consolidated Annual Performance and Evaluation Report (CAPER).

Updated Recommendation:

It is recommended that the County expand overall fair housing activities.

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CITY OF ROSEVILLE

Previous Impediment #1: The representation of most racial minority groups in Roseville is disproportionately low compared to the representation that would be expected given minority representation in the metropolitan area as a whole. Thus, the demographic pattern in Roseville is not similar to the demographic pattern in the Detroit Metropolitan Area.

Strategy: The City of Roseville should have paired testing conducted annually for the purpose of determining the extent of discrimination by race in the rental housing industry.

Status: According to SEMCOG data, from 2000-2010, Black, Asian, Multi-Racial, and Hispanic populations increased in population over this time period. Black populations grew 9.1%, Multi-Racial 1% and Hispanic also grew .5%. Increased paired testing would benefit the city's overall compliance goals.

Updated Recommendation: It is recommended that the City undertake Fair Housing Education to include lending institutions, realtors, and the general public; and to continue to work closely with local, state, and federal agencies to promote awareness of fair housing issues.

Previous Impediment #2: Blacks, Asians, and Hispanics are underrepresented in Roseville compared to their representation in Wayne, Oakland, and Macomb Detroit Metropolitan Area. However, the representation of American Indians in Roseville is similar to their representation in the Detroit Metro Area.

Strategy: The City of Roseville's Housing Commission should review and monitor, on an annual basis, its residency preference policy to ensure that it does not indirectly create an impediment to fair housing for racial minorities. The city is 92.3% white and minority residents are under-represented.

Status: The PHA residency preference policy is open to all individuals who live or work (20 hours gainful employment) is given preference. The current Section 8 wait list is current 2,451, with 67 local residents. Minorities represent 86% of the applicant wait list. The city is 83.1% white and minority American Indian representation is higher than in Detroit Metro Area.

Updated Recommendation: It is recommended that the City continue to direct resources to create affordable housing programs.

Previous Impediment #3: Roseville has a lower percentage of female-headed households (with children under 18) than the 3-county metro areas.

Strategy: Not specified

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Status: According to 2010 Census, foreign born population in Roseville is 4.9%, as compared to 9.5% in the Detroit metro area.

Updated Recommendation: Same as previous recommendation.

Previous Impediment #4: Blacks are the most residentially segregated racial minority group in Roseville. The index of dissimilarity (0 to 100) is 57.5 between blacks and whites in Roseville. An index above 50 is considered high.

Strategy: The City of Roseville's Housing Commission should expand its policy of encouraging tenant mixing by income to include tenant mixing by race-ethnicity. This would advance its de-concentration goals.

Status: 2010 Index shows 31.2, a fairly low level of segregation

Updated Recommendation: Same as previous recommendation

Previous Impediment #5: There was a significant increase in American Indian/Alaskan Native segregation, from an index of 24.2 in 1990 to 50.1 in 2000.

Strategy: Not specified

Status: Not specified

Updated Recommendation: Same as previous recommendation

Previous Impediment #6: It appears that the differences in median household income, housing value, or gross rent do not sufficiently explain racial minority under-representation in Roseville.

Strategy: The City of Roseville's Housing Commission should develop a database to track Section 8 voucher holders by race and census tract of residential location. This will enable the Housing Authority to determine whether it is meeting its obligation to ensure that minority voucher holders are not restricted to high minority, concentrated poverty census tracts.

Status: The Section 8 voucher service area is a large area from Macomb County communities including the Cities of Warren, Centerline, St. Clair Shores, Fraser, Mount Clemens, Eastpointe, Sterling Heights, Clinton and Harrison Township and is integrated into these communities with scattered-site rental units. These are not tracked by CT, but by demographics. Current Section 8 Voucher recipients are tracked and are 53% minority.

Updated Recommendation: The City of Roseville's Housing Commission should track Section 8 voucher holders by race and census tract of residential location.

Previous Impediment #7: Discrimination in rental housing based on race was the most prevalent complaint in Roseville 1988-2003.

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Strategy : The City of Roseville’s Housing Commission should specify in written detail what assistance the Roseville’s Housing Authority will provide to those households who wish to search for housing in non-impacted (i.e., neighborhoods outside of high poverty) high minority areas. The assistance may include, but not be limited to the following:

- (e) Developing and distributing a list of available rental housing in all census tracts (neighborhoods) in Roseville and surrounding areas;
- (f) Counseling related to the rental housing search process;
- (g) Formal discussions with potential apartment managers who may participate in the voucher program; and
- (h) Distributing information to voucher holders about the services provided by the Metropolitan Detroit Fair Housing Center.

Status: The area serviced by Section 8 Voucher program is a large area in southern Macomb County. The PHA serves as a resource network for apartment listings, housing resources for persons seeking housing assistance. The City of Roseville CDBG Department also serves as a point of contact for services to all residents.

Updated Recommendation: It is recommended that the City undertake Fair Housing Education to include lending institutions, realtors, and the general public; and to utilize its position as a resource network to disseminate Fair Housing and ADA information to the aforementioned groups, particularly advising them where to file fair housing complaints.

Previous Impediment #8: An assessment of the city’s Master Plan and Zoning Ordinance revealed:

- 4. The Master Plan does not state as specific goals that the city will provide a range of choices in housing styles and encourage a variety of housing types and equal opportunity.**
- 5. The Master Plan does not make specific reference to the effect that the city seeks to encourage (a) the development of suitable housing for low and moderate income households; (b) housing for senior citizens; and (c) housing with an emphasis on structural design that will minimize barriers to mobility for people with disabilities.**
- 6. The zoning ordinance does not have a policy that requires diverse representation on the Planning Commission and the Zoning Board of Appeals.**

Strategy: The City’s Master Plan should be revised to explicitly state the Plan’s goals related to fair housing. It should explicitly state its goals related to the development and encouragement of affordable housing, e.g., moderate and low income housing for the elderly and people with disabilities.

The City’s Zoning Ordinance should be amended to specifically require that membership on the Planning Commission and the Zoning Board of Appeals have broad and diverse representation, e.g., males-females, white-nonwhite, elderly-nonelderly, people with disabilities – that reflects the diversity of the city’s population.

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The City should amend its Zoning Ordinance to create a separate Zoning Board of Appeals from that of the City Council in order to ensure that the Zoning Board of Appeals has greater diversity in its membership. It should use appointment of members if necessary.

The City of Roseville's Housing Commission should review and monitor, on an annual basis, its policy on "verification of suitability for admission" to ensure that impediments to fair housing are not occurring.

The City of Roseville's Housing Commission should review its Section 8 voucher allocation process to see why no Hispanic households are voucher holders. It should determine whether any applications were received and rejected or whether and why no Hispanic households applied. After the review, it should re-examine its present outreach program to ensure that advertising in minority publications, media, and minority newspapers adequately includes and targets Hispanics.

Status: ZBA – Members of City Council not amended. Minorities currently serve on the City Planning Commission. Verification is reviewed on an annual basis; PHA data is also reviewed by the HUD Field Office on an annual basis. 3 Hispanic persons are currently Section 8 Voucher holders. The Roseville Housing Commission utilizes the local C&G Newspaper and the Macomb Daily when making public hearing/outreach communications. When the Section 8 list was opened, applicants applied from as far away as Las Vegas, Nevada.

Updated Recommendation: The City should provide Fair Housing and ADA education to its public officials, and review its official documents such as Master Plan and Zoning Ordinance to incorporate Fair Housing and ADA requirements.

Current Impediments and Recommendations

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

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The Regional Housing Findings and Policy Recommendations pointed to an aging population with an increase in elderly residents and fewer households with children. This will have an effect in housing needs and choice. This demographic shift will increase the demand for assisted living units with accessible features and other adaptive changes to residential buildings. According to the report much of the region's housing stock is designed to meet the needs of families with children. As the resident's health, lifestyle and preferences change due to age and physical ability, certain barriers such as narrow doors, hallways, etc. become impediments. Racial and ethnic minorities are concentrated in geographical regions particularly in urban municipalities, where older housing stock is located. Generally speaking the concentration of racial and ethnic minorities coincides with the concentration of lower income households.

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

Based on the above and analysis of data available, the following impediments, recommendations, and actions to reduce impediments to fair housing within Macomb County and the City of Roseville have been formulated.

Macomb County

Impediment # 1: Ensure that Fair Housing Reports are shared with Lending Institutions and Housing Providers.

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

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

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

Recommendation #3: Initiate dialogue with local lending institutions and seek their commitment and assistance in responding to the findings in the AI and other fair housing reports. After the AI is made available to the local lending institutions; a dialogue should be

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initiated aimed at seeking their commitment to participate in the dissemination of fair housing information and education for the responsible use of credit.

Impediment # 2: Deficient Coordinated Fair Housing Education Efforts by the Public Sector and the Private Sector

The County and the City had started efforts to disseminate fair housing information to the public. However, a review of the County, City and lending institutions website revealed that fair housing education and credit counseling education was scarce. Only two lending institutions had information on credit counseling. However, such information does not clarify to the reader its relationship to fair housing.

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

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

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

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

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

It is anticipated that this coordination can start during the first year of implementation of the AI. Posting of the fair housing and credit counseling information in the website is anticipated to occur during the second year of the AI and posting of the fair housing and credit counseling information in the local lending institutions is anticipated to occur during the third year of the AI and should be monitored on an ongoing basis as bank mergers occur.

Impediment # 3: Lack of Fair Housing Education and Awareness

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Due to declining funding resources neither the County nor the City have a fair housing office or staff person. However, it should be noted, that funding has been provided to agencies to undertake fair housing, despite diminishing revenues. Given their available resources, the County and the City should make best efforts to initiate a stronger fair housing education and outreach strategy.

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

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

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

Impediment # 4: Racial and ethnic minorities are concentrated geographically within the County

According to PY 2010-2011 Macomb County CAPER the number of minority residents rose from 3.3% in 1990 to 7.3% in 2000 and to 16.1% in 2010. Between 2000-2005, the Asian-American population increased by 37%, the Hispanic population increased by 29%, and the number of African-Americans increased by 144%. The CAPER indicates that the County should look into the real estate practices, and the home-seeking choices made by African-American and disabled residents to determine the extent of perceived or actual unlawful discriminatory practices, since those two groups are under-represented in the general population.

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

Recommendation #10: The County should use existing public education programs, advocacy groups and regional groups such as the South East Michigan Housing Task Force to spread information about the positive effects of affordable housing on local communities and help dispel myths.

Recommendation #11: The County should increase local educational campaign on the community benefits of providing affordable and inclusive housing options.

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Recommendation #12: The County should review existing ordinances, plans or codes to develop strategies to allow for more diversified housing.

Impediment # 5: Availability of Housing for the Elderly

The Regional Housing Findings and Policy Recommendations pointed to an aging population with an increase in elderly residents and fewer households with children. According to the report much of the region's housing stock is designed to meet the needs of families with children. Elderly housing requires special features, even if it is for independent living, and most importantly for housing which provides supportive services. According to the County's website, there are a total of 51 low and moderate income subsidized multi-family housing developments in Macomb County, of which 25 developments are for persons 50 years or older. Efforts to address the future increase in demand for elderly housing have already started with the preparation of The Aging of Macomb County – a multi-phased countywide initiative developed to cultivate and support livable communities for all generations. Under the charge of Macomb County Department of Planning and Economic Development (MCPED) this initiative seeks to establish collaborative efforts with key stakeholders throughout the County, Region, and State in order to address the evolving need of Macomb County's growing elderly population.

Macomb County responded to the needs identified in the survey by funding a major housing development in the City of Eastpointe, Oakwood Manor Senior Living, with funds from the NSP and HOME programs. This development will provide 40 new units of elderly rental housing affordable to low-, very-low-, and extremely-low-income households. This development was facilitated by a partnership between Macomb County and the City of Eastpointe through a for-profit developer.

Action: Encourage the development and rehabilitation of housing for the elderly and persons with disabilities

Recommendation #13: To address the increasing demand for elderly housing the County should direct funding efforts towards the rehabilitation and retro-fitting of existing housing, and posting of HUD's Section 202 Elderly Housing Program information on its website. By the end of the second year of the AI the County should have a draft of housing rehabilitation policies aimed at assisting the elderly.

Impediment # 6: ADA Education

It could not be determined the efforts currently being undertaken concerning ADA education.

Action: Evaluate and Improve ADA Education

Recommendation #14: The County should provide ADA education to their employees; provide contractors and builders with information packets regarding ADA requirements; post

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ADA requirements on the County and City website, respectively; and incorporate ADA requirements in the development review and permitting process of housing construction.

Impediment # 7: Unavailability of fair housing information on websites of municipalities and public housing agencies including information on filing housing discrimination complaints.

The analysis revealed that fair housing information was not readily available on the websites of municipalities or public housing agencies. There was limited or no availability of means or information on filing housing discrimination complaints.

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

Recommendation #15: The County should request participating communities and public housing agencies to include fair housing logo and information in all materials in electronic format.

City of Roseville

Impediment # 1: Deficient Sharing of Fair Housing Reports among Public Sector and Local Lending Institutions and Housing Providers.

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

Recommendation #1: The City of Roseville should make the AI available to all lending institutions in their area. The purpose of the dialogue is to discuss the impediments to fair housing, assess fair housing efforts, and seek commonality and participation in fair housing efforts.

Recommendation #2: The findings from the SE Michigan Housing Task Force should be shared with housing providers, community development corporations, developers, lenders, and other stakeholders. The City is involved in the SE Michigan Housing Task Force. The Task Force is pursuing policies and strategies around fair housing which would be of benefit to the CDBG communities and helping them meet fair housing requirements.

Recommendation #3: The City will request that the local lending institutions analyze, within the five year period, the data concerning lending practices as described in the AI document. The City will request a response from the lending institutions that operate within the City on the AI findings.

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Impediment # 2: Deficient Coordinated Fair Housing Education Efforts by the Public Sector and the Private Sector

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

Recommendation #4: The City of Roseville should include fair housing information in its main website, and include links to agencies that provide fair housing information or services such as the Detroit Fair Housing Center and the Fair Housing Office of HUD. All housing information should include the fair housing logo and where to file fair housing complaints.

Recommendation #5: The City should approach local lending institutions about sharing fair housing information and housing and credit counseling information through its website. The City should enable links with local lending institutions to offer housing and credit counseling information.

It is anticipated that this coordination can start during the first year of implementation of the AI. Posting of the fair housing and credit counseling information in the website is anticipated to occur during the second year of the AI and posting of the fair housing and credit counseling information in the local lending institutions is anticipated to occur during the third year of the AI and should be monitored on an ongoing basis as bank mergers occur.

Impediment # 3: Lack of Fair Housing Education and Awareness

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

Recommendation #6: The City of Roseville should use existing resources and programs to disseminate fair housing information and provide fair housing education on fair housing laws and best practices to local officials, landlords, and the general public. The City should utilize other media outlets and avenues to disseminate fair housing information to the public, among others: cable TV, newsletters, pamphlets, fairs, and public announcements. Special emphasis should be made during the fair housing month – including, but not limited to, a proclamation and recognition of the fair housing month in the City's website.

Recommendation #7: The City should continue to coordinate with the Continuum of Care and document the efforts of the Michigan State University Extension Service which offers homebuyer education classes and budget counseling referrals.

Recommendation #8: The City should request and use HUD Technical Assistance in implementing strategies to further fair housing.

Impediment # 4: Cost of Housing

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Action: Review programs and policies that may assist with the provision of affordable housing.

Recommendation #9: The County will request a Fair Housing training/workshop to be conducted by HUD staff, and will use HUD Technical Assistance in implementing strategies to further fair housing.

Recommendation #10: The City should increase local educational campaign on the community benefits of providing affordable and inclusive housing options.

Recommendation #11: The City should continue with the strategic redevelopment of vacant, foreclosed homes and creating attractive affordable housing options for homebuyers.

Impediment # 5: Availability of Housing for the Elderly and for Persons with Disabilities

Action: Encourage the development and rehabilitation of housing for the elderly and persons with disabilities

Recommendation #12: To address the increasing demand for elderly housing the City should continue its efforts towards the rehabilitation and retro-fitting of existing housing, and posting of HUD's Elderly Housing Program information on its website.

Recommendation #13: The City should continue to allocate resources to transitional housing and coordinate with the non-profit agencies that serve the homeless in the provision of services to the homeless special needs population.

Impediment # 6: ADA Education

Action: Evaluate and Improve ADA Education

Recommendation #14: The City should provide ADA education to their employees; provide contractors and builders with information packets regarding ADA requirements including the HUD website on ADA requirements; post ADA requirements on the City website; incorporate ADA requirements in the development review and permitting process of housing construction; and continue to provide funds to ADA/senior related projects.

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ACTION PLAN TABLE AND TIMELINE

Macomb County Action Plan

REMEDIAL ACTION RECOMMENDED	1-YEAR GOALS	3-YEAR GOALS	ON-GOING GOALS
ACTIONS TO ADDRESS CURRENT IMPEDIMENTS			
<u>MACOMB COUNTY</u>			
<i>Impediment # 1: Ensure that Fair Housing Reports are shared with Lending Institutions and Housing Providers.</i>			
<i>Action: Increase efforts to provide fair housing reports to the public and private sectors, initiate dialogue, and solicit assistance.</i>			
Recommendation #1: Macomb County should make the AI available to all lending institutions in the study area.	X		
Recommendation #2: Summary findings from the SE Michigan Housing Task Force should be shared with housing providers, community development corporations, developers, lenders, municipalities and other stakeholders. Invite sub-grantee cities to participate.	X		
Recommendation #3: The County will request that the local lending institutions analyze, within the five year period, the data concerning lending practices as described in the AI document. The County will request a response from the lending institutions that operate within Macomb County on the AI findings.		X	
<i>Impediment # 2: Deficient Coordinated Fair Housing Education Efforts by the Public Sector and the Private Sector</i>			
<i>Action: Improve coordination of Fair Housing Education Efforts through deliberate and targeted strategies.</i>			
Recommendation #4: The County should include links on its website to agencies that provide fair housing information or services such as the Detroit Fair Housing Center and the Fair Housing Office of HUD.	X		
Recommendation #5: The County should request that all Urban County participating communities and those communities participating in the HOME Consortium include fair housing information on their websites, link to fair housing agencies, and fair housing information in applications for funding.	X		

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REMEDIAL ACTION RECOMMENDED	1-YEAR GOALS	3-YEAR GOALS	ON-GOING GOALS
Recommendation #6: The County will request all Urban County participating communities that have Housing Commissions (cities of Eastpointe, Mount Clemens and New Haven) to encourage the Housing Commissions to post fair housing information on their websites and at the housing developments, including the fair housing logo and where to file fair housing complaints.		X	
Recommendation #7: The County should approach local lending institutions about sharing fair housing information, and housing and credit counseling information, through their websites. The County should include fair housing information in their main website including the fair housing logo and where to file fair housing complaints.		X	
<p><i>Impediment # 3: Lack of Fair Housing Education and Awareness</i></p> <p><i>Action: Increase efforts to disseminate fair housing information and educate local officials, employees and residents on fair housing laws</i></p>			
Recommendation #8: The County should use existing resources, such as the Fair Housing Center, and programs to disseminate fair housing information and provide fair housing education on fair housing laws and best practices to local officials, landlords, and the general public. The County should utilize other media outlets and avenues to disseminate fair housing information to the publics, among others: cable TV (when and if available), newsletters, pamphlets, fairs, and public announcements. Include fair housing information in training opportunities. Special emphasis should be made during the annual celebration of fair housing month in April—including but not limited to a proclamation, and recognition of the fair housing month on the County’s website.	X		
Recommendation #9: The County will request a Fair Housing training/workshop to be conducted by HUD staff, and will use HUD Technical Assistance in implementing strategies to further fair housing.	X		
<p><i>Impediment #4: Racial and ethnic minorities are concentrated geographically within the County</i></p> <p><i>Action: Review regulations and policies that may have an impact on the location, cost and supply of housing.</i></p>			
Recommendation #10: The County should use existing public education programs, advocacy groups and regional groups such as the South East Michigan Housing Task Force	X		

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REMEDIAL ACTION RECOMMENDED	1-YEAR GOALS	3-YEAR GOALS	ON-GOING GOALS
to spread information about the positive effects of affordable housing on local communities and help dispel myths.			
<p><i>Impediment # 5: Availability of Housing for the Elderly</i></p> <p><i>Action: Encourage the continued development and rehabilitation of housing for the elderly and persons with disabilities.</i></p>			
<p><i>Recommendation #11:</i> To address the increasing demand for elderly housing the County should encourage participating municipalities to utilize funds towards the rehabilitation and retro-fitting of existing housing, and have links to HUD’s Elderly Housing Programs information on the County website.</p>		X	
<p><i>Impediment # 6: ADA Education</i></p> <p><i>Action: Evaluate and Improve ADA Education</i></p>			
<p><i>Recommendation #12:</i> The County should provide ADA education to their employees; encourage participating municipalities to provide contractors and builders with information packets regarding ADA requirements including HUD website on ADA requirements; post ADA requirements on the County website; incorporate ADA requirements in the development review and permitting process of housing construction; and the County will continue to encourage participating municipalities’ funding of ADA and senior center projects.</p>			X
<p><i>Impediment # 7: Unavailability of fair housing information on websites of municipalities and public housing agencies including information on filing housing discrimination complaints.</i></p> <p><i>Action: Increase the availability of fair housing materials through electronic means and ensure that the fair housing logo and fair information is included on materials.</i></p>			
<p><i>Recommendation #13:</i> The County should request participating communities and public housing agencies to include fair housing logo and information in all housing materials in electronic format. Staff costs involved in implementing this recommendation is projected at \$3,000.</p>	X		

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City of Roseville Action Plan

REMEDIAL ACTION RECOMMENDED	1-YEAR GOALS	3-YEAR GOALS	ON-GOING GOALS
ACTIONS TO ADDRESS CURRENT IMPEDIMENTS			
<u>CITY OF ROSEVILLE</u>			
<p><i>Impediment # 1: AI Fair Housing Reports are not being shared with Lending Institutions and Housing Providers</i></p> <p><i>Action: Increase efforts to provide fair housing reports to the public and private sectors, initiate dialogue, and solicit assistance.</i></p>			
<p>Recommendation #1: The City of Roseville should make the AI available to all lending institutions in their area. The purpose of the dialogue is to discuss the impediments to fair housing, assess fair housing efforts, and seek commonality and participation in fair housing efforts.</p>	X		
<p>Recommendation #2: The findings from the SE Michigan Housing Task Force should be shared with housing providers, community development corporations, developers, lenders, and other stakeholders. The City is involved in the SE Michigan Housing Task Force.</p>	X		
<p>Recommendation #3: The City will request that the local lending institutions analyze, within the five year period, the data concerning lending practices as described in the AI document. The City will request a response from the lending institutions that operate within the City on the AI findings.</p>		X	
<p><i>Impediment # 2: Deficient Coordinated Fair Housing Education Efforts by the Public Sector and the Private Sector</i></p> <p><i>Action: Improve coordination of Fair Housing Education Efforts through deliberate and targeted strategies.</i></p>			
<p>Recommendation #4: The City of Roseville should include fair housing information in its main website, and include links to agencies that provide fair housing information or services such as the Detroit Fair Housing Center and the Fair Housing Office of HUD.</p>	X		
<p>Recommendation #5: The City should approach local lending institutions in writing about sharing fair housing information, and housing and credit counseling information through their websites. The City should enable links with local lending institutions to offer housing and credit counseling information.</p>		X	

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REMEDIAL ACTION RECOMMENDED	1-YEAR GOALS	3-YEAR GOALS	ON-GOING GOALS
<p><i>Impediment # 3: Lack of Fair Housing Education and Awareness</i></p> <p><i>Action: Increase efforts to disseminate fair housing information and educate local officials, employees and residents on fair housing laws.</i></p>			
<p>Recommendation #6: The City of Roseville should use existing resources and programs to disseminate fair housing information and provide fair housing education on fair housing laws and best practices to local officials, landlords, and the general public. The City should utilize other media outlets and avenues to disseminate fair housing information to the public, among others: cable TV, newsletters, pamphlets, fairs, and public announcements. Special emphasis should be made during the annual celebration of fair housing month in April– including but not limited to a proclamation, and recognition of the fair housing month in the City’s website.</p>	X		
<p>Recommendation #7: The City should continue to coordinate with the Continuum of Care and document the efforts of the Michigan State University Extension Service which offers homebuyer education classes and budget counseling referrals.</p>	X		
<p>Recommendation #8: The City will request a Fair Housing training/workshop to be conducted by HUD staff, and will use HUD Technical Assistance in implementing strategies to further fair housing.</p>		X	
<p><i>Impediment # 4: Cost of Housing</i></p> <p><i>Action: Review programs and policies that may assist with the provision of affordable housing.</i></p>			
<p>Recommendation #9: The City should increase local educational campaign on the community benefits of providing affordable and inclusive housing options.</p>		X	
<p>Recommendation #10: The City should continue with the strategic redevelopment of vacant, foreclosed homes and creating attractive affordable housing options for homebuyers.</p>	X		
<p><i>Impediment # 5: Availability of Housing for the Elderly and for Persons with Disabilities</i></p> <p><i>Action: Encourage the development and rehabilitation of housing for the elderly and persons with disabilities</i></p>			

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REMEDIAL ACTION RECOMMENDED	1-YEAR GOALS	3-YEAR GOALS	ON-GOING GOALS
Recommendation #11: To address the increasing demand for elderly housing the City should continue its efforts towards the rehabilitation and retro-fitting of existing housing, and posting of HUD’s Elderly Housing Program information on its website		X	
Recommendation #12: The City should continue to allocate resources to transitional housing and coordinate with non-profit agencies that serve the homeless in the provision of services to the homeless special needs population.			X
<p><i>Impediment # 6: ADA Education</i></p> <p><i>Action: Evaluate and Improve ADA Education</i></p>			
Recommendation #13: The City should provide ADA education to their employees; provide contractors and builders with information packets regarding ADA requirements including HUD website on ADA requirements; post ADA requirements on the City website; incorporate ADA requirements in the development review and permitting process of housing construction; and continue to provide funds to ADA/ senior related projects.		X	X

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APPENDIX 2 – HMDA Data for Macomb County

Data extracted for Macomb County from HMDA, Aggregate Table 1, 2010.

1. Census Tracts where the denial rate exceeds the Macomb County average of 23.35% are highlighted in **YELLOW**.
2. “Minority” Census Tracts are those where the minority % exceeds the County total (15%) by at least 10% (for a total of 25% or greater). These are highlighted in **RED**.

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2067	Received	26	39	63	1	129	38	29.46%	89%	9%
	Originated	17	13	27	0					
	Denied	7	5	25	1					
	Other Disposition	2	21	11	0					
2100	Received	24	9	114	6	153	37	24.18%	103%	4%
	Originated	16	8	61	2					
	Denied	4	0	30	3					
	Other Disposition	4	1	23	1					
2110	Received	42	30	111	15	198	49	24.75%	85%	7%
	Originated	26	22	54	7					
	Denied	8	3	32	6					
	Other Disposition	8	5	25	2					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2120	Received	37	28	119	8	192	44	22.92%	113%	3%
	Originated	25	20	69	3					
	Denied	8	4	29	3					
	Other Disposition	4	4	21	2					
2140	Received	6	21	79	3	109	25	22.94%	89%	4%
	Originated	4	12	42	1					
	Denied	2	2	19	2					
	Other Disposition	0	7	18	0					
2145	Received	24	38	185	1	248	56	22.58%	143%	3%
	Originated	15	23	102	0					
	Denied	6	9	41	0					
	Other Disposition	3	6	42	1					
2150	Received	29	46	175	4	254	44	17.32%	124%	4%
	Originated	21	31	117	2					
	Denied	2	6	34	2					
	Other Disposition	6	9	24	0					
2152	Received	21	90	321	6	438	91	20.78%	153%	2%
	Originated	15	58	192	4					
	Denied	3	19	69	0					
	Other Disposition	3	13	60	2					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2153	Received	26	23	83	4	136	31	22.79%	96%	5%
	Originated	15	16	53	1					
	Denied	7	4	18	2					
	Other Disposition	4	3	12	1					
2155	Received	38	51	209	8	306	59	19.28%	91%	6%
	Originated	26	32	135	3					
	Denied	5	10	42	2					
	Other Disposition	7	9	32	3					
2160	Received	15	11	141	4	171	38	22.22%	113%	3%
	Originated	9	9	80	1					
	Denied	4	0	31	3					
	Other Disposition	2	2	30	0					
2170	Received	7	10	67	6	90	20	22.22%	99%	4%
	Originated	5	7	42	3					
	Denied	0	1	16	3					
	Other Disposition	2	2	9	0					
2180	Received	56	44	71	16	187	52	27.81%	70%	32%
	Originated	34	32	42	8					
	Denied	12	9	25	6					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	10	3	4	2					
2200	Received	92	50	313	14	469	98	20.90%	106%	4%
	Originated	70	32	180	6					
	Denied	10	15	67	6					
	Other Disposition	12	3	66	2					
2211	Received	92	58	220	19	389	83	21.34%	96%	5%
	Originated	68	32	127	7					
	Denied	11	11	53	8					
	Other Disposition	13	15	40	4					
2212	Received	61	29	115	11	216	59	27.31%	104%	12%
	Originated	42	19	67	3					
	Denied	12	8	34	5					
	Other Disposition	7	2	14	3					
2214	Received	18	4	59	2	83	13	15.66%	110%	3%
	Originated	13	3	34	1					
	Denied	4	0	9	0					
	Other Disposition	1	1	16	1					
2215	Received	4	8	54	3	69	20	28.99%	116%	3%
	Originated	1	5	32	1					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	3	1	14	2					
	Other Disposition	0	2	8	0					
2218	Received	75	45	145	9	274	52	18.98%	112%	4%
	Originated	55	36	95	1					
	Denied	10	6	31	5					
	Other Disposition	10	3	19	3					
2221	Received	103	189	280	17	589	122	20.71%	94%	13%
	Originated	75	50	168	3					
	Denied	19	25	65	13					
	Other Disposition	9	114	47	1					
2225	Received	26	20	98	5	149	40	26.85%	119%	3%
	Originated	17	13	38	3					
	Denied	4	3	31	2					
	Other Disposition	5	4	29	0					
2228	Received	32	16	104	6	158	40	25.32%	106%	5%
	Originated	16	9	55	6					
	Denied	9	6	25	0					
	Other Disposition	7	1	24	0					
2234	Received	80	58	321	14	473	89	18.82%	115%	4%

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Originated	56	39	199	4					
	Denied	9	9	63	8					
	Other Disposition	15	10	59	2					
2235	Received	26	16	39	0	81	23	28.40%	114%	4%
	Originated	14	15	14	0					
	Denied	8	1	14	0					
	Other Disposition	4	0	11	0					
2238	Received	107	102	596	9	814	120	14.74%	124%	4%
	Originated	77	77	400	3					
	Denied	18	11	87	4					
	Other Disposition	12	14	109	2					
2239	Received	58	60	301	14	433	77	17.78%	127%	5%
	Originated	38	50	199	3					
	Denied	6	3	58	10					
	Other Disposition	14	7	44	1					
2240	Received	124	102	543	15	784	115	14.67%	126%	5%
	Originated	77	78	358	6					
	Denied	26	10	72	7					
	Other Disposition	21	14	113	2					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2241	Received	78	59	403	12	552	93	16.85%	124%	6%
	Originated	51	46	275	5					
	Denied	20	8	59	6					
	Other Disposition	7	5	69	1					
2242	Received	67	151	228	11	457	79	17.29%	88%	6%
	Originated	45	95	132	5					
	Denied	16	13	45	5					
	Other Disposition	6	43	51	1					
2243	Received	71	30	196	7	304	54	17.76%	125%	5%
	Originated	43	19	137	4					
	Denied	17	6	28	3					
	Other Disposition	11	5	31	0					
2244	Received	34	32	166	6	238	36	15.13%	118%	4%
	Originated	27	24	110	4					
	Denied	5	4	26	1					
	Other Disposition	2	4	30	1					
2245	Received	44	35	92	3	174	37	21.26%	121%	4%
	Originated	31	26	58	2					
	Denied	10	5	21	1					
	Other Disposition	3	4	13	0					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2246	Received	32	22	94	2	150	32	21.33%	91%	6%
	Originated	25	11	54	1					
	Denied	3	7	21	1					
	Other Disposition	4	4	19	0					
2251	Received	30	27	77	2	136	26	19.12%	102%	3%
	Originated	19	18	53	1					
	Denied	9	5	11	1					
	Other Disposition	2	4	13	0					
2252	Received	30	54	224	7	315	64	20.32%	118%	4%
	Originated	22	30	148	2					
	Denied	3	12	46	3					
	Other Disposition	5	12	30	2					
2253	Received	24	18	96	4	142	24	16.90%	132%	4%
	Originated	18	13	65	4					
	Denied	3	4	17	0					
	Other Disposition	3	1	14	0					
2254	Received	34	76	339	4	453	66	14.57%	159%	3%
	Originated	26	60	240	2					
	Denied	1	7	57	1					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	7	9	42	1					
2255	Received	31	23	147	4	205	29	14.15%	106%	6%
	Originated	25	18	85	3					
	Denied	3	1	25	0					
	Other Disposition	3	4	37	1					
2256	Received	38	21	57	7	123	30	24.39%	79%	12%
	Originated	25	10	25	5					
	Denied	7	5	17	1					
	Other Disposition	6	6	15	1					
2257	Received	33	20	54	3	110	28	25.45%	79%	16%
	Originated	23	13	29	1					
	Denied	7	6	13	2					
	Other Disposition	3	1	12	0					
2258	Received	73	31	180	7	291	74	25.43%	98%	4%
	Originated	40	20	101	2					
	Denied	20	6	43	5					
	Other Disposition	13	5	36	0					
2259	Received	29	23	147	9	208	45	21.63%	108%	3%
	Originated	21	15	84	4					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	6	7	29	3					
	Other Disposition	2	1	34	2					
2261	Received	51	69	344	12	476	75	15.76%	168%	4%
	Originated	35	45	232	7					
	Denied	6	13	55	1					
	Other Disposition	10	11	57	4					
2264	Received	12	26	116	6	160	29	18.13%	150%	4%
	Originated	7	13	81	2					
	Denied	0	6	21	2					
	Other Disposition	5	7	14	2					
2267	Received	16	24	74	5	119	35	29.41%	74%	4%
	Originated	12	16	37	1					
	Denied	1	5	25	4					
	Other Disposition	3	3	12	0					
2270	Received	33	52	289	7	381	76	19.95%	121%	6%
	Originated	18	37	186	2					
	Denied	8	9	56	3					
	Other Disposition	7	6	47	2					
2273	Received	14	17	89	4	124	18	14.52%	147%	6%

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Originated	10	14	61	2					
	Denied	2	1	13	2					
	Other Disposition	2	2	15	0					
2280	Received	25	25	35	4	89	21	23.60%	84%	8%
	Originated	19	16	23	2					
	Denied	4	7	8	2					
	Other Disposition	2	2	4	0					
2281	Received	10	6	11	1	28	9	32.14%	85%	7%
	Originated	6	2	9	0					
	Denied	2	4	2	1					
	Other Disposition	2	0	0	0					
2300	Received	17	20	74	2	113	38	33.63%	99%	10%
	Originated	11	9	29	2					
	Denied	6	5	27	0					
	Other Disposition	0	6	18	0					
2302	Received	36	20	119	10	185	30	16.22%	107%	3%
	Originated	28	15	66	5					
	Denied	4	4	18	4					
	Other Disposition	4	1	35	1					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2303	Received	48	15	82	13	158	28	17.72%	88%	7%
	Originated	27	10	49	6					
	Denied	5	1	18	4					
	Other Disposition	16	4	15	3					
2304	Received	36	11	82	3	132	28	21.21%	101%	4%
	Originated	29	10	47	0					
	Denied	5	1	20	2					
	Other Disposition	2	0	15	1					
2305	Received	9	13	25	1	48	13	27.08%	62%	9%
	Originated	7	4	10	1					
	Denied	0	6	7	0					
	Other Disposition	2	3	8	0					
2306	Received	56	122	452	17	647	142	21.95%	134%	15%
	Originated	29	76	262	5					
	Denied	11	25	97	9					
	Other Disposition	16	21	93	3					
2307	Received	25	30	127	7	189	44	23.28%	115%	16%
	Originated	15	17	76	3					
	Denied	4	11	27	2					
	Other Disposition	6	2	24	2					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2308	Received	28	20	73	7	128	36	28.13%	82%	10%
	Originated	17	7	35	3					
	Denied	6	9	18	3					
	Other Disposition	5	4	20	1					
2309	Received	50	20	107	8	185	32	17.30%	98%	8%
	Originated	37	17	65	5					
	Denied	8	0	21	3					
	Other Disposition	5	3	21	0					
2310	Received	31	6	86	16	139	37	26.62%	105%	6%
	Originated	23	4	43	5					
	Denied	4	1	23	9					
	Other Disposition	4	1	20	2					
2311	Received	23	12	66	3	104	31	29.81%	90%	8%
	Originated	13	6	34	1					
	Denied	5	5	19	2					
	Other Disposition	5	1	13	0					
2312	Received	24	11	67	5	107	21	19.63%	104%	11%
	Originated	16	7	44	3					
	Denied	3	4	12	2					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	5	0	11	0					
2313	Received	0	1	2	0	3	3	100.00%	36%	4%
	Originated	0	0	0	0					
	Denied	0	1	2	0					
	Other Disposition	0	0	0	0					
2314	Received	46	32	116	14	208	57	27.40%	112%	14%
	Originated	22	14	68	5					
	Denied	16	11	26	4					
	Other Disposition	8	7	22	5					
2315	Received	34	29	130	8	201	62	30.85%	117%	18%
	Originated	22	18	60	3					
	Denied	8	8	41	5					
	Other Disposition	4	3	29	0					
2316	Received	36	14	42	1	93	26	27.96%	78%	17%
	Originated	20	9	23	0					
	Denied	13	3	9	1					
	Other Disposition	3	2	10	0					
2317	Received	41	43	130	4	218	67	30.73%	115%	14%
	Originated	26	25	67	1					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	12	14	38	3					
	Other Disposition	3	4	25	0					
2318	Received	28	20	88	3	139	34	24.46%	93%	10%
	Originated	14	11	57	2					
	Denied	13	8	13	0					
	Other Disposition	1	1	18	1					
2319	Received	38	18	142	11	209	48	22.97%	107%	8%
	Originated	26	13	89	5					
	Denied	6	3	33	6					
	Other Disposition	6	2	20	0					
2320	Received	23	19	51	11	104	33	31.73%	126%	5%
	Originated	11	9	29	4					
	Denied	7	8	11	7					
	Other Disposition	5	2	11	0					
2321	Received	45	25	134	7	211	43	20.38%	89%	8%
	Originated	23	15	78	4					
	Denied	11	6	24	2					
	Other Disposition	11	4	32	1					
2322	Received	23	20	61	9	113	30	26.55%	90%	11%

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Originated	17	14	37	1					
	Denied	3	4	17	6					
	Other Disposition	3	2	7	2					
2323	Received	17	10	56	8	91	21	23.08%	94%	14%
	Originated	12	8	36	4					
	Denied	3	2	12	4					
	Other Disposition	2	0	8	0					
2324	Received	32	10	69	13	124	27	21.77%	90%	13%
	Originated	21	9	37	7					
	Denied	5	1	17	4					
	Other Disposition	6	0	15	2					
2325	Received	36	19	118	2	175	31	17.71%	119%	4%
	Originated	23	13	81	1					
	Denied	7	4	19	1					
	Other Disposition	6	2	18	0					
2330	Received	35	33	162	12	242	59	24.38%	128%	4%
	Originated	27	19	96	2					
	Denied	3	12	34	10					
	Other Disposition	5	2	32	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2400	Received	6	13	15	2	36	14	38.89%	61%	27%
	Originated	2	8	7	0					
	Denied	3	4	5	2					
	Other Disposition	1	1	3	0					
2403	Received	30	18	71	8	127	22	17.32%	93%	6%
	Originated	19	14	42	3					
	Denied	4	1	15	2					
	Other Disposition	7	3	14	3					
2404	Received	40	37	128	5	210	52	24.76%	107%	4%
	Originated	28	28	74	2					
	Denied	7	7	36	2					
	Other Disposition	5	2	18	1					
2405	Received	8	40	30	6	84	15	17.86%	74%	4%
	Originated	5	19	14	2					
	Denied	2	2	7	4					
	Other Disposition	1	19	9	0					
2406	Received	51	22	151	10	234	51	21.79%	98%	6%
	Originated	38	15	84	6					
	Denied	10	3	34	4					
	Other Disposition	3	4	33	0					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2407	Received	28	22	115	7	172	32	18.60%	126%	4%
	Originated	19	17	73	3					
	Denied	6	2	21	3					
	Other Disposition	3	3	21	1					
2408	Received	27	47	60	13	147	47	31.97%	75%	6%
	Originated	14	28	29	4					
	Denied	8	17	16	6					
	Other Disposition	5	2	15	3					
2409	Received	16	6	32	0	54	15	27.78%	95%	4%
	Originated	11	4	18	0					
	Denied	4	1	10	0					
	Other Disposition	1	1	4	0					
2410	Received	23	13	40	3	79	19	24.05%	72%	13%
	Originated	18	8	17	1					
	Denied	3	4	10	2					
	Other Disposition	2	1	13	0					
2412	Received	30	15	52	11	108	40	37.04%	88%	8%
	Originated	26	6	18	4					
	Denied	3	9	21	7					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	1	0	13	0					
2413	Received	4	3	18	1	26	8	30.77%	64%	21%
	Originated	3	2	10	1					
	Denied	1	1	6	0					
	Other Disposition	0	0	2	0					
2414	Received	20	8	52	3	83	17	20.48%	99%	3%
	Originated	13	6	33	2					
	Denied	5	0	11	1					
	Other Disposition	2	2	8	0					
2415	Received	22	13	56	4	95	23	24.21%	97%	6%
	Originated	17	8	29	2					
	Denied	4	3	14	2					
	Other Disposition	1	2	13	0					
2416	Received	15	2	21	4	42	17	40.48%	80%	11%
	Originated	8	0	6	1					
	Denied	6	2	7	2					
	Other Disposition	1	0	8	1					
2417	Received	22	9	37	15	83	37	44.58%	77%	9%
	Originated	13	3	15	2					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	5	6	15	11					
	Other Disposition	4	0	7	2					
2418	Received	37	11	64	10	122	46	37.70%	89%	37%
	Originated	24	4	25	1					
	Denied	10	6	23	7					
	Other Disposition	3	1	16	2					
2419	Received	32	11	60	4	107	29	27.10%	81%	9%
	Originated	22	5	29	2					
	Denied	7	3	17	2					
	Other Disposition	3	3	14	0					
2420	Received	12	31	39	3	85	23	27.06%	78%	8%
	Originated	10	20	17	0					
	Denied	1	9	10	3					
	Other Disposition	1	2	12	0					
2421	Received	12	8	6	1	27	8	29.63%	74%	11%
	Originated	8	6	2	1					
	Denied	3	2	3	0					
	Other Disposition	1	0	1	0					
2425	Received	60	48	141	10	259	50	19.31%	98%	5%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Originated	37	39	85	5					
	Denied	12	4	29	5					
	Other Disposition	11	5	27	0					
2430	Received	22	30	127	3	182	33	18.13%	128%	6%
	Originated	12	24	81	1					
	Denied	7	4	20	2					
	Other Disposition	3	2	26	0					
2435	Received	30	19	119	6	174	41	23.56%	109%	13%
	Originated	26	11	59	1					
	Denied	2	5	30	4					
	Other Disposition	2	3	30	1					
2440	Received	19	12	62	2	95	15	15.79%	102%	4%
	Originated	14	10	36	1					
	Denied	2	1	12	0					
	Other Disposition	3	1	14	1					
2450	Received	4	5	10	3	22	9	40.91%	48%	47%
	Originated	4	0	4	1					
	Denied	0	4	3	2					
	Other Disposition	0	1	3	0					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2451	Received	28	14	38	10	90	31	34.44%	64%	13%
	Originated	22	6	13	2					
	Denied	2	4	20	5					
	Other Disposition	4	4	5	3					
2452	Received	6	2	7	1	16	4	25.00%	75%	23%
	Originated	6	1	2	1					
	Denied	0	0	4	0					
	Other Disposition	0	1	1	0					
2453	Received	40	5	66	0	111	28	25.23%	95%	9%
	Originated	31	2	32	0					
	Denied	5	2	21	0					
	Other Disposition	4	1	13	0					
2454	Received	9	1	17	4	31	15	48.39%	66%	68%
	Originated	5	1	5	0					
	Denied	2	0	9	4					
	Other Disposition	2	0	3	0					
2471	Received	0	2	0	0	2	2	100.00%	50%	11%
	Originated	0	0	0	0					
	Denied	0	2	0	0					
	Other Disposition	0	0	0	0					

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Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2472	Received	45	38	198	8	289	68	23.53%	104%	5%
	Originated	30	27	114	3					
	Denied	7	5	52	4					
	Other Disposition	8	6	32	1					
2473	Received	43	38	240	8	329	65	19.76%	121%	3%
	Originated	23	29	135	2					
	Denied	6	7	48	4					
	Other Disposition	14	2	57	2					
2474	Received	16	20	81	1	118	41	34.75%	117%	4%
	Originated	12	12	33	0					
	Denied	2	4	34	1					
	Other Disposition	2	4	14	0					
2475	Received	6	3	20	5	34	17	50.00%	84%	5%
	Originated	2	2	11	0					
	Denied	3	1	8	5					
	Other Disposition	1	0	1	0					
2476	Received	47	18	61	4	130	37	28.46%	86%	9%
	Originated	34	9	24	1					
	Denied	5	8	22	2					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	8	1	15	1					
2500	Received	26	7	47	4	84	20	23.81%	86%	3%
	Originated	14	5	27	1					
	Denied	3	1	13	3					
	Other Disposition	9	1	7	0					
2501	Received	18	11	23	4	56	14	25.00%	81%	3%
	Originated	15	7	10	3					
	Denied	2	2	9	1					
	Other Disposition	1	2	4	0					
2502	Received	30	6	41	7	84	25	29.76%	91%	4%
	Originated	16	5	19	6					
	Denied	8	0	17	0					
	Other Disposition	6	1	5	1					
2503	Received	23	17	35	7	82	28	34.15%	78%	8%
	Originated	15	13	15	1					
	Denied	6	2	15	5					
	Other Disposition	2	2	5	1					
2504	Received	10	1	21	5	37	14	37.84%	86%	3%
	Originated	8	1	8	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	1	0	9	4					
	Other Disposition	1	0	4	1					
2505	Received	15	7	33	1	56	15	26.79%	79%	3%
	Originated	7	4	19	0					
	Denied	4	1	10	0					
	Other Disposition	4	2	4	1					
2506	Received	23	12	45	3	83	29	34.94%	75%	5%
	Originated	17	8	18	1					
	Denied	6	2	19	2					
	Other Disposition	0	2	8	0					
2507	Received	20	12	49	4	85	20	23.53%	98%	3%
	Originated	18	10	23	0					
	Denied	2	2	13	3					
	Other Disposition	0	0	13	1					
2508	Received	23	10	31	4	68	15	22.06%	82%	4%
	Originated	19	7	17	1					
	Denied	2	2	9	2					
	Other Disposition	2	1	5	1					
2509	Received	23	16	37	6	82	20	24.39%	91%	3%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Originated	18	11	17	2					
	Denied	2	3	13	2					
	Other Disposition	3	2	7	2					
2510	Received	12	4	31	3	50	6	12.00%	88%	3%
	Originated	9	3	21	1					
	Denied	2	0	3	1					
	Other Disposition	1	1	7	1					
2511	Received	20	10	41	2	73	23	31.51%	107%	3%
	Originated	15	7	16	1					
	Denied	3	1	19	0					
	Other Disposition	2	2	6	1					
2512	Received	29	21	88	4	142	30	21.13%	107%	4%
	Originated	19	15	37	1					
	Denied	4	1	24	1					
	Other Disposition	6	5	27	2					
2513	Received	28	9	51	6	94	21	22.34%	91%	2%
	Originated	17	9	32	2					
	Denied	7	0	10	4					
	Other Disposition	4	0	9	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2514	Received	31	8	47	6	92	30	32.61%	79%	3%
	Originated	22	6	23	2					
	Denied	9	1	17	3					
	Other Disposition	0	1	7	1					
2515	Received	12	4	12	2	30	6	20.00%	74%	4%
	Originated	10	3	5	2					
	Denied	0	1	5	0					
	Other Disposition	2	0	2	0					
2516	Received	16	7	32	4	59	17	28.81%	81%	4%
	Originated	9	4	15	1					
	Denied	4	2	8	3					
	Other Disposition	3	1	9	0					
2517	Received	20	13	54	1	88	26	29.55%	89%	5%
	Originated	14	9	25	0					
	Denied	3	1	22	0					
	Other Disposition	3	3	7	1					
2518	Received	41	25	46	6	118	28	23.73%	90%	7%
	Originated	25	16	23	4					
	Denied	9	5	12	2					
	Other Disposition	7	4	11	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2519	Received	34	8	46	3	91	21	23.08%	91%	4%
	Originated	25	6	23	0					
	Denied	3	2	14	2					
	Other Disposition	6	0	9	1					
2520	Received	26	11	27	1	65	16	24.62%	80%	5%
	Originated	18	7	14	1					
	Denied	5	2	9	0					
	Other Disposition	3	2	4	0					
2521	Received	21	11	21	4	57	10	17.54%	80%	4%
	Originated	15	10	10	2					
	Denied	2	0	7	1					
	Other Disposition	4	1	4	1					
2522	Received	19	11	55	4	89	22	24.72%	95%	4%
	Originated	12	6	29	3					
	Denied	4	2	15	1					
	Other Disposition	3	3	11	0					
2540	Received	13	8	24	5	50	9	18.00%	82%	3%
	Originated	9	5	18	3					
	Denied	3	1	3	2					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	1	2	3	0					
2541	Received	28	16	64	1	109	27	24.77%	103%	5%
	Originated	15	14	32	0					
	Denied	6	1	19	1					
	Other Disposition	7	1	13	0					
2542	Received	18	11	50	4	83	14	16.87%	84%	6%
	Originated	14	9	34	3					
	Denied	3	0	10	1					
	Other Disposition	1	2	6	0					
2545	Received	26	9	47	2	84	23	27.38%	98%	3%
	Originated	21	4	23	1					
	Denied	3	3	17	0					
	Other Disposition	2	2	7	1					
2550	Received	25	13	30	5	73	26	35.62%	73%	10%
	Originated	15	7	8	3					
	Denied	7	4	13	2					
	Other Disposition	3	2	9	0					
2551	Received	21	8	28	3	60	18	30.00%	74%	5%
	Originated	15	5	11	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	4	2	10	2					
	Other Disposition	2	1	7	1					
2552	Received	17	4	17	2	40	14	35.00%	60%	15%
	Originated	12	3	2	0					
	Denied	1	1	10	2					
	Other Disposition	4	0	5	0					
2553	Received	32	11	30	3	76	20	26.32%	72%	6%
	Originated	20	5	13	0					
	Denied	5	3	10	2					
	Other Disposition	7	3	7	1					
2554	Received	19	3	23	5	50	11	22.00%	80%	4%
	Originated	10	3	8	2					
	Denied	3	0	5	3					
	Other Disposition	6	0	10	0					
2555	Received	11	3	15	3	32	6	18.75%	91%	5%
	Originated	7	2	9	0					
	Denied	0	1	4	1					
	Other Disposition	4	0	2	2					
2556	Received	17	4	22	5	48	13	27.08%	65%	4%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Originated	10	3	7	2					
	Denied	4	1	6	2					
	Other Disposition	3	0	9	1					
2557	Received	8	3	15	0	26	9	34.62%	69%	7%
	Originated	6	3	3	0					
	Denied	1	0	8	0					
	Other Disposition	1	0	4	0					
2558	Received	20	4	23	3	50	14	28.00%	72%	7%
	Originated	17	1	10	1					
	Denied	1	2	10	1					
	Other Disposition	2	1	3	1					
2559	Received	6	0	7	5	18	6	33.33%	71%	6%
	Originated	4	0	2	3					
	Denied	2	0	3	1					
	Other Disposition	0	0	2	1					
2560	Received	19	6	25	4	54	11	20.37%	86%	5%
	Originated	16	4	11	2					
	Denied	2	1	6	2					
	Other Disposition	1	1	8	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2561	Received	23	3	11	8	45	18	40.00%	71%	5%
	Originated	11	2	5	0					
	Denied	5	1	4	8					
	Other Disposition	7	0	2	0					
2562	Received	4	2	15	2	23	5	21.74%	71%	5%
	Originated	2	2	8	2					
	Denied	2	0	3	0					
	Other Disposition	0	0	4	0					
2563	Received	5	1	13	3	22	8	36.36%	72%	6%
	Originated	4	0	6	3					
	Denied	1	1	6	0					
	Other Disposition	0	0	1	0					
2564	Received	9	4	8	1	22	5	22.73%	72%	6%
	Originated	8	3	4	0					
	Denied	1	0	3	1					
	Other Disposition	0	1	1	0					
2565	Received	10	5	18	2	35	9	25.71%	74%	5%
	Originated	6	3	10	1					
	Denied	3	1	4	1					
	Other Disposition	1	1	4	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2566	Received	12	7	12	5	36	16	44.44%	65%	23%
	Originated	9	4	4	1					
	Denied	2	3	7	4					
	Other Disposition	1	0	1	0					
2567	Received	21	5	23	4	53	18	33.96%	69%	7%
	Originated	11	2	12	3					
	Denied	7	3	7	1					
	Other Disposition	3	0	4	0					
2568	Received	13	4	12	4	33	11	33.33%	85%	4%
	Originated	8	2	7	1					
	Denied	4	2	2	3					
	Other Disposition	1	0	3	0					
2580	Received	20	12	16	5	53	21	39.62%	92%	6%
	Originated	13	6	8	1					
	Denied	6	5	6	4					
	Other Disposition	1	1	2	0					
2581	Received	20	9	40	8	77	33	42.86%	78%	6%
	Originated	12	1	20	2					
	Denied	7	7	13	6					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	1	1	7	0					
2582	Received	16	4	30	3	53	16	30.19%	80%	6%
	Originated	12	1	10	3					
	Denied	3	2	11	0					
	Other Disposition	1	1	9	0					
2583	Received	27	2	22	3	54	22	40.74%	81%	6%
	Originated	12	0	10	0					
	Denied	10	2	7	3					
	Other Disposition	5	0	5	0					
2584	Received	30	12	36	11	89	26	29.21%	73%	6%
	Originated	20	7	21	4					
	Denied	5	2	12	7					
	Other Disposition	5	3	3	0					
2585	Received	18	8	14	4	44	13	29.55%	91%	16%
	Originated	10	6	5	2					
	Denied	4	2	5	2					
	Other Disposition	4	0	4	0					
2586	Received	32	5	32	6	75	18	24.00%	76%	8%
	Originated	18	4	15	2					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	7	0	8	3					
	Other Disposition	7	1	9	1					
2587	Received	14	7	15	3	39	10	25.64%	80%	7%
	Originated	8	3	9	0					
	Denied	1	2	4	3					
	Other Disposition	5	2	2	0					
2588	Received	34	7	21	7	69	27	39.13%	99%	22%
	Originated	19	2	3	2					
	Denied	9	3	10	5					
	Other Disposition	6	2	8	0					
2589	Received	13	5	20	10	48	22	45.83%	74%	9%
	Originated	5	2	4	4					
	Denied	6	1	11	4					
	Other Disposition	2	2	5	2					
2600	Received	17	10	39	3	69	18	26.09%	95%	4%
	Originated	11	8	18	2					
	Denied	5	2	10	1					
	Other Disposition	1	0	11	0					
2601	Received	14	7	18	5	44	12	27.27%	90%	10%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Originated	11	5	6	0					
	Denied	0	0	7	5					
	Other Disposition	3	2	5	0					
2602	Received	14	19	36	8	77	24	31.17%	96%	2%
	Originated	11	6	20	1					
	Denied	0	8	10	6					
	Other Disposition	3	5	6	1					
2603	Received	23	15	46	10	94	21	22.34%	96%	5%
	Originated	16	10	27	3					
	Denied	4	3	7	7					
	Other Disposition	3	2	12	0					
2604	Received	28	30	64	6	128	27	21.09%	99%	4%
	Originated	18	22	37	2					
	Denied	4	6	15	2					
	Other Disposition	6	2	12	2					
2605	Received	1	2	0	0	3	0	0.00%	40%	0%
	Originated	0	0	0	0					
	Denied	0	0	0	0					
	Other Disposition	1	2	0	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2606	Received	27	12	34	6	79	18	22.78%	91%	7%
	Originated	18	9	19	2					
	Denied	4	2	8	4					
	Other Disposition	5	1	7	0					
2607	Received	17	10	39	3	69	14	20.29%	85%	8%
	Originated	12	9	19	0					
	Denied	3	0	9	2					
	Other Disposition	2	1	11	1					
2608	Received	26	19	38	0	83	25	30.12%	90%	4%
	Originated	12	9	27	0					
	Denied	11	8	6	0					
	Other Disposition	3	2	5	0					
2609	Received	32	20	55	9	116	35	30.17%	92%	13%
	Originated	24	14	23	3					
	Denied	6	6	18	5					
	Other Disposition	2	0	14	1					
2610	Received	44	24	68	5	141	38	26.95%	104%	8%
	Originated	28	16	31	2					
	Denied	9	7	19	3					
	Other Disposition	7	1	18	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2611	Received	29	20	60	11	120	25	20.83%	80%	9%
	Originated	21	11	40	3					
	Denied	3	4	11	7					
	Other Disposition	5	5	9	1					
2612	Received	26	11	36	2	75	15	20.00%	89%	6%
	Originated	15	9	22	0					
	Denied	5	2	6	2					
	Other Disposition	6	0	8	0					
2613	Received	26	9	38	6	79	24	30.38%	84%	3%
	Originated	17	6	19	1					
	Denied	4	3	12	5					
	Other Disposition	5	0	7	0					
2614	Received	28	3	39	7	77	25	32.47%	96%	3%
	Originated	18	2	17	0					
	Denied	7	1	11	6					
	Other Disposition	3	0	11	1					
2615	Received	22	13	36	6	77	22	28.57%	86%	6%
	Originated	14	10	16	1					
	Denied	6	2	11	3					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	2	1	9	2					
2616	Received	9	0	22	3	34	8	23.53%	105%	4%
	Originated	9	0	11	0					
	Denied	0	0	6	2					
	Other Disposition	0	0	5	1					
2617	Received	11	2	13	1	27	8	29.63%	77%	12%
	Originated	5	2	8	0					
	Denied	3	0	4	1					
	Other Disposition	3	0	1	0					
2618	Received	36	19	27	9	91	28	30.77%	88%	6%
	Originated	21	12	16	1					
	Denied	10	4	6	8					
	Other Disposition	5	3	5	0					
2619	Received	21	14	17	7	59	13	22.03%	79%	9%
	Originated	16	9	8	4					
	Denied	2	5	4	2					
	Other Disposition	3	0	5	1					
2620	Received	27	15	50	8	100	17	17.00%	89%	9%
	Originated	22	10	26	5					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	3	3	9	2					
	Other Disposition	2	2	15	1					
2621	Received	5	2	10	0	17	5	29.41%	59%	12%
	Originated	2	1	3	0					
	Denied	1	1	3	0					
	Other Disposition	2	0	4	0					
2622	Received	28	19	67	8	122	37	30.33%	91%	7%
	Originated	18	12	29	3					
	Denied	7	3	23	4					
	Other Disposition	3	4	15	1					
2623	Received	15	16	28	6	65	21	32.31%	79%	23%
	Originated	8	6	13	2					
	Denied	4	6	7	4					
	Other Disposition	3	4	8	0					
2624	Received	25	15	25	7	72	24	33.33%	78%	10%
	Originated	16	5	13	3					
	Denied	6	7	7	4					
	Other Disposition	3	3	5	0					
2625	Received	55	21	49	7	132	41	31.06%	76%	10%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Originated	34	13	19	2					
	Denied	14	7	16	4					
	Other Disposition	7	1	14	1					
2626	Received	21	7	14	3	45	7	15.56%	81%	7%
	Originated	15	5	10	2					
	Denied	1	1	4	1					
	Other Disposition	5	1	0	0					
2627	Received	57	18	56	24	155	53	34.19%	76%	14%
	Originated	37	9	29	5					
	Denied	9	6	20	18					
	Other Disposition	11	3	7	1					
2628	Received	8	4	7	8	27	9	33.33%	70%	17%
	Originated	8	3	1	5					
	Denied	0	1	6	2					
	Other Disposition	0	0	0	1					
2629	Received	18	3	18	10	49	22	44.90%	67%	6%
	Originated	7	3	6	3					
	Denied	4	0	11	7					
	Other Disposition	7	0	1	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2630	Received	2	0	7	1	10	3	30.00%	68%	7%
	Originated	1	0	4	0					
	Denied	1	0	1	1					
	Other Disposition	0	0	2	0					
2631	Received	5	5	8	4	22	9	40.91%	60%	6%
	Originated	3	2	2	3					
	Denied	1	3	4	1					
	Other Disposition	1	0	2	0					
2632	Received	4	1	10	13	28	16	57.14%	57%	7%
	Originated	2	0	2	4					
	Denied	2	1	5	8					
	Other Disposition	0	0	3	1					
2633	Received	2	0	4	0	6	1	16.67%	89%	7%
	Originated	2	0	3	0					
	Denied	0	0	1	0					
	Other Disposition	0	0	0	0					
2634	Received	31	15	44	9	99	34	34.34%	81%	9%
	Originated	15	12	16	3					
	Denied	9	3	17	5					
	Other Disposition	7	0	11	1					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2635	Received	28	6	27	18	79	36	45.57%	75%	11%
	Originated	13	4	7	6					
	Denied	11	2	13	10					
	Other Disposition	4	0	7	2					
2636	Received	20	16	16	3	55	19	34.55%	59%	25%
	Originated	9	8	5	1					
	Denied	3	5	9	2					
	Other Disposition	8	3	2	0					
2637	Received	16	7	25	14	62	28	45.16%	69%	12%
	Originated	11	1	9	4					
	Denied	4	4	10	10					
	Other Disposition	1	2	6	0					
2638	Received	6	0	8	6	20	12	60.00%	55%	11%
	Originated	4	0	2	0					
	Denied	1	0	5	6					
	Other Disposition	1	0	1	0					
2639	Received	1	1	11	4	17	9	52.94%	52%	12%
	Originated	0	0	6	0					
	Denied	1	1	4	3					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	0	0	1	1					
2640	Received	1	0	12	4	17	11	64.71%	51%	16%
	Originated	1	0	3	1					
	Denied	0	0	8	3					
	Other Disposition	0	0	1	0					
2641	Received	5	3	5	11	24	15	62.50%	57%	10%
	Originated	3	0	2	2					
	Denied	2	3	1	9					
	Other Disposition	0	0	2	0					
2642	Received	8	2	20	10	40	22	55.00%	59%	9%
	Originated	5	1	6	2					
	Denied	2	1	11	8					
	Other Disposition	1	0	3	0					
2676	Received	16	5	21	6	48	10	20.83%	86%	6%
	Originated	12	5	15	1					
	Denied	3	0	3	4					
	Other Disposition	1	0	3	1					
2680	Received	29	12	35	12	88	30	34.09%	73%	5%
	Originated	17	8	16	5					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	5	2	16	7					
	Other Disposition	7	2	3	0					
2681	Received	21	2	19	6	48	18	37.50%	63%	12%
	Originated	13	1	9	1					
	Denied	7	0	6	5					
	Other Disposition	1	1	4	0					
	Total Macomb County Received			27,373						
	Total Macomb County Denied			6,391						
	Overall Denial Rate for Macomb County			23.35%						

APPENDIX 3 – HMDA Data for City of Roseville

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Data extracted for the City of Roseville from HMDA, Aggregate Table 1, 2010.

1. Census Tracts where the denial rate exceeds the City of Roseville average of 29.90% are highlighted in **YELLOW**.
2. "Minority" Census Tracts are those where the minority % exceeds the County total (17%) by at least 10% (for a total of 27% or greater). These are highlighted in **RED**.

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
2550	Received	25	13	30	5	73	26	35.62%	73%	10%
	Originated	15	7	8	3					
	Denied	7	4	13	2					
	Other Disposition	3	2	9	0					
2551	Received	21	8	28	3	60	18	30.00%	74%	5%
	Originated	15	5	11	0					
	Denied	4	2	10	2					
	Other Disposition	2	1	7	1					
2552	Received	17	4	17	2	40	14	35.00%	60%	15%
	Originated	12	3	2	0					
	Denied	1	1	10	2					
	Other Disposition	4	0	5	0					
2553	Received	32	11	30	3	76	20	26.32%	72%	6%

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Originated	20	5	13	0					
	Denied	5	3	10	2					
	Other Disposition	7	3	7	1					
2554	Received	19	3	23	5	50	11	22.00%	80%	4%
	Originated	10	3	8	2					
	Denied	3	0	5	3					
	Other Disposition	6	0	10	0					
2555	Received	11	3	15	3	32	6	18.75%	91%	5%
	Originated	7	2	9	0					
	Denied	0	1	4	1					
	Other Disposition	4	0	2	2					
2556	Received	17	4	22	5	48	13	27.08%	65%	4%
	Originated	10	3	7	2					
	Denied	4	1	6	2					
	Other Disposition	3	0	9	1					
2557	Received	8	3	15	0	26	9	34.62%	69%	7%
	Originated	6	3	3	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Denied	1	0	8	0					
	Other Disposition	1	0	4	0					
2558	Received	20	4	23	3	50	14	28.00%	72%	7%
	Originated	17	1	10	1					
	Denied	1	2	10	1					
	Other Disposition	2	1	3	1					
2559	Received	6	0	7	5	18	6	33.33%	71%	6%
	Originated	4	0	2	3					
	Denied	2	0	3	1					
	Other Disposition	0	0	2	1					
2560	Received	19	6	25	4	54	11	20.37%	86%	5%
	Originated	16	4	11	2					
	Denied	2	1	6	2					
	Other Disposition	1	1	8	0					
2561	Received	23	3	11	8	45	18	40.00%	71%	5%
	Originated	11	2	5	0					
	Denied	5	1	4	8					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Other Disposition	7	0	2	0					
2562	Received	4	2	15	2	23	5	21.74%	71%	5%
	Originated	2	2	8	2					
	Denied	2	0	3	0					
	Other Disposition	0	0	4	0					
2563	Received	5	1	13	3	22	8	36.36%	72%	6%
	Originated	4	0	6	3					
	Denied	1	1	6	0					
	Other Disposition	0	0	1	0					
2564	Received	9	4	8	1	22	5	22.73%	72%	6%
	Originated	8	3	4	0					
	Denied	1	0	3	1					
	Other Disposition	0	1	1	0					
2565	Received	10	5	18	2	35	9	25.71%	74%	5%
	Originated	6	3	10	1					
	Denied	3	1	4	1					
	Other	1	1	4	0					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Census Tract	Disposition	Federally Insured	Conventional	Refinance	Home Improvement	Total Received	Total Denied	Total % Denied	Median Income as % of MSA Median	% Minority Population
	Disposition									
2566	Received	12	7	12	5	36	16	44.44%	65%	23%
	Originated	9	4	4	1					
	Denied	2	3	7	4					
	Other Disposition	1	0	1	0					
2567	Received	21	5	23	4	53	18	33.96%	69%	7%
	Originated	11	2	12	3					
	Denied	7	3	7	1					
	Other Disposition	3	0	4	0					
2568	Received	13	4	12	4	33	11	33.33%	85%	4%
	Originated	8	2	7	1					
	Denied	4	2	2	3					
	Other Disposition	1	0	3	0					
Total Roseville Received					796					
Total Roseville Denied					238					
Overall Denial Rate for Roseville					29.90%					

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

APPENDIX 4 – MDCR Data

**Housing Discrimination Complaints Involving Properties in Macomb County
Processed by the State of Michigan Department of Civil Rights
2005 – Present**

Discrimination Location	Open Date	Close Date	Type of Closure	Issue/Basis of Complaint	Claimant Address	Respondent Address
Utica, MI	10/27/05	7/31/07	Insufficient evidence - No Adjustment	Housing, White, Other terms & conditions, Physical Disability	Utica, MI	Utica, MI
Mount Clemens, MI	7/13/06	8/30/07	Insufficient evidence - No Adjustment	Housing, Middle East, White, Referred by HUD, Married, Failure to rent, National Origin , Disability	Warren, MI	Mount Clemens, MI
Fraser, MI	8/14/06	10/29/07	Withdrawn - Adjustment	Housing, White, Referred by HUD, Failure to accommodate, Physical Disability	Fraser, MI	Fraser, MI
Mount Clemens, MI	11/17/06	1/31/08	Withdrawn - No interest in pursuing w/ MDCR / fed agency	Housing, White, Referred by HUD, Harassment/Not Sexual, Race	Mount Clemens, MI	Troy, MI
Mount Clemens, MI	12/11/06	6/30/07	Insufficient evidence - No Adjustment	Housing, White, Referred by HUD, Failure to accommodate, Physical Disability	Clinton Township, MI	Mount Clemens, MI
Shelby Township, MI	1/18/07	6/30/07	Insufficient evidence - No Adjustment	Housing, White, Referred by HUD, Eviction, National Origin , Retaliation	Shelby Township, MI	Shelby Township, MI
Macomb, MI	2/23/07	2/29/08	Insufficient evidence - No Adjustment	Housing, Black or African American, Referred by HUD, Eviction, Race	Harper Woods, MI	Macomb, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Utica, MI	3/16/07	6/29/07	Insufficient evidence - No Adjustment	Housing, American , Black or African American, Failure to rent, Age , Race	Chesterfield Township,MI	Utica, MI
Not provided	3/26/07	11/27/07	Attempts to contact claimant unsuccessful	Housing, American , Black or African American, Referred by HUD, Other terms & conditions, Race	Detroit, MI	Center Line, MI
Not provided	3/28/07	8/30/07	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Race	Oak Park, MI	Mount Clemens, MI
Harrison Township, MI	6/12/07	10/23/07	Attempts to contact claimant unsuccessful	Housing, American , Black or African American, Referred by HUD, Failure to rent, Race	Roseville, MI	Harrison Township, MI
Not provided	6/19/07	6/19/07	Insufficient grounds to file, incl. no standing to file	Housing, Other terms & conditions	Fraser, MI	
Mount Clemens, MI	6/25/07	8/27/07	Attempts to contact claimant unsuccessful	Housing, White, Failure to accommodate, Physical Disability	Mount Clemens ,MI	Mount Clemens, MI
Center Line, MI	7/11/07	8/22/07	Insufficient grounds to file, incl. no standing to file	Housing	Warren, MI	Centerline, MI
Lenox, MI	8/3/07	8/24/07	Customer declined to file	Housing, American , White, Eviction, Race, Other terms & conditions	Lenox, MI	Lenox, MI
Lenox, MI	8/3/07	5/30/08	Insufficient evidence - Adjustment	Housing, American, White, Eviction, Race , Other terms & conditions	Lenox, MI	Lenox ,MI
Not provided	8/6/07	6/25/08	Insufficient evidence - No Adjustment	Housing, American , Black or African American, Eviction , Mental Disability	Brundidge, AL	Centerline, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Mount Clemens, MI	8/7/07	8/8/07	Insufficient grounds to file, incl. no standing to file	Housing, Black or African American, Eviction, Race	Mount Clemens, MI	Mount Clemens, MI
Shelby Township, MI	8/14/07	8/21/07	Customer declined to file	Housing, White	Clinton Township, MI	Shelby Township, MI
Not provided	8/30/07	3/26/08	Customer declined to file	Housing, White, Referred by HUD, Other terms & conditions, Race	Hamtramck, MI	Shelby Township, MI
Eastpointe, MI	9/5/07	1/31/08	Settlement Agreement	Housing, American , Black or African American, Referred by HUD, Other terms & conditions, Race	Eastpointe, MI	Eastpointe, MI
Eastpointe, MI	9/27/07	6/2/09	Settlement Agreement	Housing, Black or African American, Harassment/Not Sexual, Race	Eastpointe, MI	Eastpointe, MI
Harrison Township, MI	10/1/07	6/26/08	Withdrawn - Intent to Pursue in Court - No RTS ltr requested	Housing, Black or African American, Harassment/Not Sexual, Race	Harrison Township, MI	Roseville, MI
Not provided	11/6/07	12/28/07	Customer declined to file	Housing, White, Other terms & conditions , Physical Disability , Retaliation	New Baltimore, MI	Clay Township, MI
Romeo, MI	11/19/07	12/4/07	Lack of Jurisdiction for MDCR	Housing, White	Not provided	Romeo, MI
Roseville, MI	12/11/07	1/14/08	Customer declined to file	Housing, Black or African American, Other terms & conditions, Race, Retaliation	Roseville, MI	Roseville, MI
Not provided	12/20/07	2/25/08	Customer declined to file	Housing, Referred by HUD, Other terms & conditions , Physical Disability	Center Line, MI	Detroit, MI
Not provided	1/7/08	5/15/08	Insufficient evidence - No Adjustment	Housing, Eviction, Physical Disability	Fraser, MI	Algonac, MI
Fraser, MI	1/17/08	5/28/08	Settlement Agreement	Housing, White, Other terms & conditions , Physical Disability	Fraser, MI	Clinton Township, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Eastpointe, MI	1/17/08	6/2/09	Settlement Agreement	Housing, Black or African American, Other terms & conditions, Race , Retaliation	Eastpointe, MI	Eastpointe, MI
Centerline, MI	1/18/08	5/6/08	Customer declined to file	Housing, Black or African American, Eviction, Race , Mental Disability	Detroit, MI	Centerline, MI
Fraser, MI	2/8/08	5/30/08	Withdrawn - Adjustment	Housing, Referred by HUD, Failure to accommodate, , Physical Disability, Eviction	Clinton Township, MI	Fraser, MI
Fraser, MI	2/8/08	4/30/08	Withdrawn - Adjustment	Housing, Referred by HUD, Failure to accommodate, Physical Disability	Fraser, MI	Fraser, MI
Macomb, MI	2/21/08	6/27/08	Settlement Agreement	Housing, Referred by HUD, Failure to accommodate , Physical Disability	Washington, MI	Macomb, MI
Macomb, MI	3/7/08	6/27/08	Withdrawn - Adjustment	Housing, Referred by HUD, Other terms & conditions , Physical Disability	Ira, MI	Macomb, MI
Not provided	4/6/08	5/16/08	Customer declined to file	Housing	Mount Clemens, MI	Not provided
Fraser, MI	4/6/08	7/11/08	Untimely	Housing, Other European, Other terms & conditions , National Origin	Fraser, MI	Clinton Township, MI
Macomb, MI	4/10/08	5/15/08	Created in error, Duplicate complaint	Housing, Telephone, Repeat customer, Failure to accommodate, Physical Disability	Washington, MI	Macomb, MI
Shelby Township, MI	4/19/08	7/31/08	Withdrawn - No interest in pursuing w/ MDCR / fed agency	Housing, American , Black or African American, Referred by HUD, Failure to loan, Race	Wayne, MI	Shelby Township, MI
Not provided	4/25/08	7/8/08	Attempts to contact claimant unsuccessful	Housing, American , Black or African American	Mount Clemens, MI	Mount Clemens, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Fraser, MI	5/2/08	6/26/08	Withdrawn - Intent to Pursue in Court - No RTS ltr requested	Housing, Black or African American, Other terms & conditions, Race	Fraser, MI	Fraser, MI
East Pointe, MI	5/29/08	11/20/08	Insufficient evidence - No Adjustment	Housing, Black or African American, Harassment/Not Sexual, Race	East Pointe, MI	East Pointe, MI
Eastpointe, MI	6/6/08	7/31/08	Insufficient evidence - No Adjustment	Housing, Black or African American, Detroit NAACP, Eviction, Race	Eastpointe, MI	Eastpointe, MI
Not provided	7/14/08	7/22/08	Insufficient grounds to file, incl. no standing to file	Housing, Black or African American, Harassment/Not Sexual, Race	Warren, MI	Shelby Township, MI
Roseville, MI	9/8/08	1/6/09	Insufficient evidence - No Adjustment	Housing, Jehovah's Witness, Leasing, Harassment/Not Sexual, Religion, Mental Disability	Warren, MI	Roseville, MI
Roseville, MI	9/11/08	11/30/08	Withdrawn - Adjustment	Housing, American White, Divorced, Failure to rent, Physical Disability	Roseville, MI	Roseville, MI
Not provided	9/24/08	9/29/08	Customer declined to file	Housing, White	Roseville, MI	East Lansing, MI
Roseville, MI	10/8/08	10/22/08	Duplicate complaint	Housing, Jehovah's Witness, Rental; Leasing, Eviction, Religion, Disability	Warren, MI	Roseville, MI
Not provided	10/17/08	11/19/08	Customer declined to file	Housing	Roseville, MI	Not provided
Not provided	10/21/08	1/15/09	Untimely	Housing, Black or African American, Real Estate; Rental; Leasing, Eviction, Race	Detroit, MI	Center Line, MI
Not provided	11/3/08	11/17/08	Insufficient grounds to file, incl. no standing to file	Housing	Roseville, MI	Frankfort, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Not provided	12/15/08	3/27/09	Not provided	Housing, Referred by HUD, Married, Failure to rent, Familial Status	Macomb Township, MI	Birmingham, MI
Not provided	12/15/08	6/25/09	Insufficient evidence - No Adjustment	Housing, Referred by HUD, Married, Failure to rent, Familial Status	Macomb Township, MI	Birmingham, MI
Not provided	12/22/08	4/20/09	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Race	Eastpointe, MI	Oak Park, MI
Richmond, MI	1/13/09	10/29/10	Withdrawn - Adjustment	Housing, Black or African American, Referred by HUD, Failure to rent, Race	Detroit, MI	Richmond, MI
Roseville, MI	1/13/09	5/26/09	Withdrawn - Adjustment	Housing, American , White, Divorced, Other terms & conditions , Mental Disability , Retaliation	Roseville, MI	Roseville, MI
New Haven, MI	1/20/09	3/30/09	Withdrawn - Adjustment	Housing, American Indian/Alaska Native, Failure to rent , Physical Disability	Burton, MI	New Haven, MI
Not provided	1/22/09	6/26/09	Withdrawn - Adjustment	Housing, Referred by HUD, Eviction , Physical Disability , Failure to accommodate , Physical Disability	Macomb Township, MI	Clinton Township, MI
Not provided	1/22/09	4/28/09	Insufficient evidence - No Adjustment	Housing, Black or African American, Referred by HUD, Failure to rent, Race	Fraser, MI	Mount Clemens, MI
Not provided	1/22/09	6/25/09	Insufficient evidence - No Adjustment	Housing, Black or African American, Referred by HUD, Failure to rent, Race	Fraser, MI	Mount Clemens, MI
Mount Clemens, MI	1/22/09	4/28/09	Insufficient evidence - No Adjustment	Housing, Black or African American, Referred by HUD, Failure to rent, Race	Not provided	Mount Clemens, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Mount Clemens, MI	1/22/09	6/25/09	Insufficient evidence - No Adjustment	Housing, Black or African American, Referred by HUD, Failure to rent, Race	Not provided	Mount Clemens, MI
New Baltimore, MI	1/28/09	3/30/09	Insufficient evidence - No Adjustment	Housing, Black or African American, Referred by HUD, Other terms & conditions, Race	Clinton Township, MI	New Baltimore, MI
Romeo, MI	2/9/09	4/30/09	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Race	Romeo, MI	Romeo, MI
Chesterfield, MI	2/10/09	2/11/09	Lack of Jurisdiction for MDCR	Housing	Chesterfield Township, MI	Chesterfield, MI
Not provided	2/10/09	2/21/09	Lack of Jurisdiction for MDCR	Housing, Failure to rent	Harrison Township, MI	Clinton Township, MI
East Detroit, MI	2/25/09	4/1/09	Lack of Jurisdiction for MDCR	Housing, Black or African American	Eastpointe, MI	East Detroit, MI
Not provided	3/5/09	4/20/09	Insufficient evidence - No Adjustment	Housing, Other terms & conditions, Sex	Not provided	Macomb, MI
Shelby Township, MI	3/10/09	4/29/10	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Race	Detroit, MI	Shelby Township, MI
Not provided	3/23/09	4/8/09	Untimely	Housing, Black or African American, Harassment/Not Sexual, Race	Warren, MI	Shelby Township, MI
Eastpointe, MI	5/1/09	5/31/09	Withdrawn - Adjustment	Housing, Black or African American, Eviction, Race	Eastpointe, MI	Eastpointe, MI
Harrison Township, MI	5/22/09	7/7/09	Customer declined to file	Housing, Rental; Leasing, Harassment/Not Sexual , Physical Disability	Not provided	Harrison Township, MI
Not provided	6/11/09	8/10/09	Untimely	Housing, Rental; Leasing, Harassment/Not Sexual, Disability	Harrison Township, MI	Harrison Township, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Not provided	6/16/09	11/30/09	Insufficient evidence - No Adjustment	Housing, Black or African American, Refusal to sell, Race	Detroit, MI	Macomb, MI
Not provided	7/3/09	10/30/09	Withdrawn - Adjustment	Housing, Black or African American, Referred by HUD, Other terms & conditions, Race , Retaliation	Harrison Township, MI	Bingham Farms, MI
Not provided	7/3/09	11/28/09	Insufficient evidence - No Adjustment	Housing, Referred by HUD, Eviction, Familial Status	Harrison Township, MI	Harrison Township, MI
Not provided	7/3/09	8/13/09	Customer declined to file	Housing	Romeo, MI	Shelby Township, MI
Harrison Township, MI	8/18/09	8/31/11	Insufficient evidence - No Adjustment	Housing, Black or African American, Referred by HUD, Other terms & conditions, Race	Pontiac, MI	Harrison Township, MI
Not provided	8/25/09	9/25/09	Withdrawn - Adjustment	Housing, Referred by HUD, Failure to accommodate, Physical Disability	Centerline, MI	Centerline, MI
Shelby Township, MI	9/14/09	3/31/10	Insufficient evidence - No Adjustment	Housing, Black or African American, Harassment/Not Sexual, Race	Berkley, MI	Shelby Township, MI
Shelby Township, MI	9/17/09	6/21/10	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Race	Berkley, MI	Shelby Township, MI
Shelby Township, MI	9/17/09	2/27/10	Insufficient evidence - No Adjustment	Housing, Black or African American, Harassment/Not Sexual, Race	Not provided	Shelby Township, MI
Roseville, MI	10/8/09	3/31/10	Insufficient evidence - Adjustment	Housing, Other terms & conditions , Mental Disability	Not provided	Roseville, MI
Mount Clemens, MI	10/29/09	5/31/10	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Race , Mental Disability	Mount Clemens, MI	Mount Clemens, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Not provided	11/16/09	12/22/09	Lack of Jurisdiction for MDCR	Housing, Failure to rent	Canton, MI	Washington Township, MI
Roseville, MI	11/23/09	7/30/10	Settlement Agreement	Housing, Referred by HUD, Other terms & conditions , Physical Disability	Pontiac, MI	Roseville, MI
Harrison Township, MI	12/3/09	12/28/09	Lack of Jurisdiction for MDCR	Housing, Black or African American, Other terms & conditions, Race	Harrison Township, MI	Harrison Township, MI
Chesterfield Township, MI	12/11/09	3/2/10	Customer declined to file	Housing, Black or African American, Eviction , Mental disability	Chesterfield, MI	Chesterfield Township, MI
Romeo, MI	12/16/09	1/7/10	Customer declined to file	Housing, White, Failure to rent , Mental Disability	Lake Orion, MI	Romeo, MI
Harrison Township, MI	1/20/10	6/28/10	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Race	Harrison Township, MI	Harrison Township, MI
Shelby Township, MI	1/25/10	1/28/10	Lack of Jurisdiction for MDCR	Housing, White, Other terms & conditions	Shelby Township, MI	Shelby Township, MI
Not provided	2/22/10	3/9/10	Customer declined to file	Housing, Other terms & conditions	Mount Clemens, MI	Not provided
Not provided	2/22/10	3/10/10	Untimely	Housing, Other terms & conditions	Mount Clemens, MI	Not provided
Not provided	2/27/10	3/2/10	Lack of Jurisdiction for MDCR	Housing, Other terms & conditions	Mount Clemens, MI	Mount Clemens, MI
Harrison Twp, MI	3/5/10	2/13/12	Post-Investigation Settlement Agreement / Adjustive Action	Housing, Referred by HUD, Other terms & conditions , Physical Disability	Detroit, MI	Harrison Twp, MI
Macomb, MI	3/22/10	8/30/10	Settlement Agreement	Housing, Black or African American, Failure to rent, Race , Sex	Harrison Twp, MI	Chicago, IL
Not provided	4/21/10	5/3/10	Customer declined to file	Housing, White	Mount Clemens, MI	Not provided

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Not provided	6/1/10	9/20/10	Withdrawn - No interest in pursuing w/ MDCR / fed agency	Housing, Referred by HUD, Failure to rent , Mental Disability	Shelby Township, MI	Chicago, IL
Mount Clemens, MI	6/9/10	8/30/10	Insufficient evidence - No Adjustment	Housing, Black or African American, Eviction, Retaliation , Race , Mental Disability	Mount Clemens, MI	Mount Clemens, MI
Harrison Township, MI	6/9/10	11/15/10	Insufficient evidence - No Adjustment	Housing, Black or African American, Harassment/Not Sexual, Race , Retaliation	Not provided	Harrison Township, MI
Not provided	6/28/10	7/26/11	Settlement Agreement	Housing, White, Referred by HUD, Failure to rent, Race	West Bloomfield, MI	Shelby Township, MI
Mount Clemens, MI	6/29/10	7/9/10	Lack of Jurisdiction for MDCR	Housing, Referred by HUD	Mount Clemens, MI	Mount Clemens, MI
Mount Clemens, MI	7/30/10	8/2/10	Lack of Jurisdiction for MDCR	Housing	Mount Clemens, MI	Mount Clemens, MI
Not provided	8/12/10	11/14/10	Claimant failure to cooperate	Housing, Black or African American, Referred by HUD, Other terms & conditions, Race	Rochester, MI	Shelby Township, MI
Harrison Township, MI	9/2/10	3/31/11	Insufficient evidence - No Adjustment	Housing, White, Real Estate; Rental; Leasing, Harassment/Not Sexual , Mental Disability	Harrison Township, MI	Harrison Township, MI
Eastpointe, MI	9/17/10	6/22/11	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Race	Bloomfield Hills, MI	Eastpointe, MI
Fraser, MI	10/25/10	1/26/11	Withdrawn - No interest in pursuing w/ MDCR / fed agency	Housing, American , White, Eviction, Physical Disability	Fraser, MI	Fraser, MI
Fraser, MI	11/2/10	12/31/10	Settlement Agreement	Housing, Referred by HUD, Failure to accommodate, Mental Disability	Fraser, MI	Fraser, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Utica, MI	11/18/10	12/28/11	Insufficient evidence - No Adjustment	Housing, Pakistani, Referred by HUD, Muslim, Real Estate; Rental; Leasing, Eviction, National Origin , Religion	Sterling Heights, MI	Utica, MI
Roseville, MI	12/2/10	5/31/11	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Retaliation , Race	Roseville, MI	Roseville, MI
Shelby Township, MI	12/15/10	7/27/11	Settlement Agreement	Housing, White, Other terms & conditions, Familial Status	Clinton Township, MI	Shelby Township, MI
Roseville, MI	1/12/11	1/19/11	Customer declined to file	Housing, Failure to accommodate , Physical Disability	Roseville, MI	Roseville, MI
Not provided	1/25/11	12/21/11	Insufficient evidence - No Adjustment	Housing, White, Referred by HUD, Other terms & conditions, Sex	Richmond, MI	Santa Rosa, CA
Fraser, MI	1/25/11	3/4/11	Withdrawn - Adjustment	Housing, White, Referred by HUD, Failure to accommodate , Physical Disability	Fraser, MI	Southfield, MI
Shelby Township, MI	2/1/11	5/31/11	Insufficient evidence - No Adjustment	Housing, Black or African American, Harassment/Not Sexual, Race	Shelby Township, MI	Shelby Township, MI
Mount Clemens, MI	2/15/11	2/17/11	Lack of Jurisdiction for MDCR	Housing, White, Other terms & conditions	Mount Clemens, MI	Mount Clemens, MI
Not provided	3/10/11	2/1/12	Insufficient evidence - No Adjustment	Housing, White, Referred by HUD, Failure to accommodate , Physical Disability	Washington, MI	Bingham Farms, MI
Mount Clemens, MI	4/8/11	4/14/11	Lack of Jurisdiction for MDCR	Housing, White, Other terms & conditions	Mount Clemens, MI	Mount Clemens, MI
Fraser, MI	5/3/11	5/11/11	Lack of Jurisdiction for MDCR	Housing, White, Other terms & conditions	Fraser, MI	Fraser, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Roseville, MI	5/27/11	5/31/11	Lack of Jurisdiction for MDCR	Housing, Black or African American	Roseville, MI	Roseville, MI
Not provided	6/6/11	6/6/11	Customer declined to file	Housing, White, Other terms & conditions	Washington Township, MI	Roseville, MI
Not provided	7/1/11	2/27/12	Insufficient evidence - No Adjustment	Housing, Black or African American, Failure to rent, Race	Washington Township,	Rochester Hills, MI
Not provided	7/18/11	8/3/11	Lack of Jurisdiction for MDCR	Housing, Black or African American, Other terms & conditions, Race	Eastpointe, MI	Eastpointe, MI
Clinton Township, MI	7/26/11	1/30/12	Insufficient evidence - No Adjustment	Housing, White, Failure to accommodate , Physical Disability	Clinton Township, MI	Mount Clemens, MI
Center Line, MI	8/10/11	9/19/11	Signed/notarized complaint not returned	Housing, Black or African American, Other terms & conditions, Physical Disability	Center Line, MI	Shelby Township, MI
Not provided	8/25/11	9/29/11	Attempts to contact claimant unsuccessful	Housing, Multi-Racial, Harassment/Not Sexual, Race	Port Huron, MI	Richmond, MI
Not provided	9/19/11	1/30/12	Insufficient evidence - No Adjustment	Housing, Referred by other agency, Divorced, Other terms & conditions, Sex , Marital Status	Bloomfield Hills, MI	Centerline, MI
Not provided	9/27/11	10/17/11	Lack of Jurisdiction for MDCR	Housing	Eastpointe, MI	Westland, MI
Mount Clemens, MI	10/10/11	10/12/11	Customer declined to file	Housing, Failure to accommodate , Physical Disability	Mount Clemens, MI	Mount Clemens, MI
Mount Clemens, MI	10/10/11	12/21/11	Withdrawn - Adjustment	Housing, Failure to accommodate , Physical Disability	Mount Clemens, MI	Mount Clemens, MI
Not provided	10/14/11	10/26/11	Attempts to contact claimant unsuccessful	Housing	Shelby Township, MI	Not provided

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Utica, MI	11/7/11	5/31/12	Insufficient evidence	Housing, Black or African American, Other terms & conditions, Race	Saint Clair Shores, MI	Utica, MI
Shelby Township, MI	11/28/11	12/19/11	Settlement Agreement	Housing, Failure to accommodate , Physical Disability , Eviction /cardiovascular impair., Other (Write In)	Birmingham, MI	Shelby Township, MI
Shelby Township, MI	11/28/11	5/21/12	Settlement Agreement	Housing, Failure to accommodate , Physical Disability , Eviction	Birmingham, MI	Shelby Township, MI
Not provided	12/13/11	2/8/12	Attempts to contact claimant unsuccessful	Housing	Shelby Township, MI	Lansing, MI
Roseville, MI	12/21/11	3/30/12	Insufficient evidence - No Adjustment	Housing, Black or African American, Other terms & conditions, Race , Retaliation	Roseville, MI	Roseville, MI
Mount Clemens, MI	1/24/12	3/30/12	Withdrawn - Adjustment	Housing, White, Eviction, Familial Status	Mount Clemens, MI	Macomb, MI
Macomb, MI	2/9/12	4/30/12	Insufficient evidence - No Adjustment	Housing, Black or African American, Real Estate Developer, Failure to rent, Race	Detroit, MI	Macomb, MI
Not provided	3/9/12	3/22/12	Customer declined to file	Housing, Black or African American, Other terms & conditions, Age	Eastpointe, MI	Detroit, MI
Mount Clemens, MI	3/19/12	4/4/12	Lack of Jurisdiction for MDCR	Housing, Other terms & conditions	Detroit, MI	Mount Clemens, MI
Not provided	3/30/12	4/19/12	Lack of Jurisdiction for MDCR	Housing, Other terms & conditions, Age	Roseville, MI	Frankfort, MI
Utica, MI	5/3/12	5/31/12	Signed/notarized complaint not returned	Housing, Other terms & conditions , Physical Disability	Utica, MI	Utica, MI

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

APPENDIX 5 – FHCMD Data

**Discrimination Complaint Activity Involving Properties in Macomb County
Processed by the Fair Housing Center of Metropolitan Detroit
October 2006 – September 2007**

Community	# of Complaints	* Type of Complaint										** Type of Transaction									
		R	A	S	C	Re	NO	FS	MS	H/D	O	Ren	Sa	Mg	Cp	Cd	Ap	In	GH/Z	Ad	
Fraser	1									1					1						
Macomb Township	1	1													1						
Mt. Clemens	2	2													1		1				
Shelby Township	1	1													1						
MACOMB COUNTY TOTAL	5	4	0	1	0	2	1	0	2	0	0	0	0	0							

* Type of Complaint = Discrimination based on Race (R), Age (A), Sex (S), Color (C), Religion (Re), National Origin (NO), Familial Status (FS), Marital Status (MS), Handicap/Disability (H/D), or Other (O).

** Type of Transaction = Rental (Ren), Sales (Sa), Mortgage (Mg), Cooperative (Cp), Condominium (Cd), Appraisal (Ap), Residential Insurance (In), Group Home/Zoning (GH/Z), or Advertising (A).

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

**Discrimination Complaint Activity Involving Properties in Macomb County
Processed by the Fair Housing Center of Metropolitan Detroit
October 2007 – September 2008**

Community	# of Complaints	* Type of Complaint										** Type of Transaction										
		R	A	S	C	Re	NO	FS	MS	H/D	O	Ren	Sa	Mg	Cp	Cd	Ap	In	GH/Z	Ad		
Center Line	1									1					1							
Eastpointe	2	2													1	1						
Macomb	1	1														1						
MACOMB COUNTY TOTAL	4	3	0	1	0	2	2	0														

* Type of Complaint = Discrimination based on Race (R), Age (A), Sex (S), Color (C), Religion (Re), National Origin (NO), Familial Status (FS), Marital Status (MS), Handicap/Disability (H/D), or Other (O).

** Type of Transaction = Rental (Ren), Sales (Sa), Mortgage (Mg), Cooperative (Cp), Condominium (Cd), Appraisal (Ap), Residential Insurance (In), Group Home/Zoning (GH/Z), or Advertising (A).

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

**Discrimination Complaint Activity Involving Properties in Macomb County
Processed by the Fair Housing Center of Metropolitan Detroit
October 2008 – September 2009**

Community	# of Complaints	* Type of Complaint										** Type of Transaction										
		R	A	S	C	Re	NO	FS	MS	H/D	O	Ren	Sa	Mg	Cp	Cd	Ap	In	GH/Z	Ad		
Eastpointe	2	2												1								
Fraser	1	1												1	1							
Harrison Township	1									1									1			
Macomb	1	1													1							
Mt. Clemens	5	4								1				3	1				1			
Washington Township	1									1									1			
MACOMB COUNTY TOTAL	11	8	0	3	0	5	3	0	0	3	0	0	0									

* Type of Complaint = Discrimination based on Race (R), Age (A), Sex (S), Color (C), Religion (Re), National Origin (NO), Familial Status (FS), Marital Status (MS), Handicap/Disability (H/D), or Other (O).

** Type of Transaction = Rental (Ren), Sales (Sa), Mortgage (Mg), Cooperative (Cp), Condominium (Cd), Appraisal (Ap), Residential Insurance (In), Group Home/Zoning (GH/Z), or Advertising (A).

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

**Discrimination Complaint Activity Involving Properties in Macomb County
Processed by the Fair Housing Center of Metropolitan Detroit
October 2009 – September 2010**

Community	# of Complaints	* Type of Complaint										** Type of Transaction													
		R	A	S	C	Re	NO	FS	MS	H/D	O	Ren	Sa	Mg	Cp	Cd	Ap	In	GH/Z	Ad					
Macomb	4	3	1											1	1	2									
Mt. Clemens	1	1																						1	
Roseville	2	1									1			1											
MACOMB COUNTY TOTAL	7	5	1	0	1	0	0	2	1	2	1	1	0												

* Type of Complaint = Discrimination based on Race (R), Age (A), Sex (S), Color (C), Religion (Re), National Origin (NO), Familial Status (FS), Marital Status (MS), Handicap/Disability (H/D), or Other (O).

** Type of Transaction = Rental (Ren), Sales (Sa), Mortgage (Mg), Cooperative (Cp), Condominium (Cd), Appraisal (Ap), Residential Insurance (In), Group Home/Zoning (GH/Z), or Advertising (A).

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

**Discrimination Complaint Activity Involving Properties in Macomb County
Processed by the Fair Housing Center of Metropolitan Detroit
October 2010 – September 2011**

Community	# of Complaints	* Type of Complaint										** Type of Transaction									
		R	A	S	C	Re	NO	FS	MS	H/D	O	Ren	Sa	Mg	Cp	Cd	Ap	In	GH/Z	Ad	
Eastpointe	1			1						1					1						
Harrison Township	1									1									1		
Mt. Clemens	1									1					1						
New Baltimore	1									1					1						
Roseville	2	1													2						
Shelby Township	1	1								2					1						
Washington	1	1													1						
MACOMB COUNTY TOTAL	8	3	0	1	0	0	0	0	0	6	0			6	1	0	0	1	0	0	0

* Type of Complaint = Discrimination based on Race (R), Age (A), Sex (S), Color (C), Religion (Re), National Origin (NO), Familial Status (FS), Marital Status (MS), Handicap/Disability (H/D), or Other (O).

** Type of Transaction = Rental (Ren), Sales (Sa), Mortgage (Mg), Cooperative (Cp), Condominium (Cd), Appraisal (Ap), Residential Insurance (In), Group Home/Zoning (GH/Z), or Advertising (A).

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

APPENDIX 6 – HUD Data

Cases Filed From Macomb County, MI - Calendar Year 2006

HUD Case Number	Case Name	HUD Filing Date	Bases	Issues	Closure Date	Closure Reason	Case Completion Type	Violation City	Number of Filed Cases
05-06-0791-8	Marangos, Dimitrios vs Lakeside Park Apartments	03/15/06	National Origin,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	11/30/06	No Cause	No Cause	Shelby Township	1
05-06-1227-8	Abner, Barbara v M.I. Wang (Clinton River Apartments)	05/01/06	Race,	310 - Discriminatory refusal to rent,	06/23/06	No Cause	No Cause	Mount Clemens	1
05-06-1295-8	Banks, Linda v MGA Homes, Inc.	05/31/06	Race,	381 - Discrimination in terms/conditions/privileges relating to sale,	06/30/06	Withdrawn After Resolution	Conciliated/ Settled	Shelby Township	1
05-06-1294-8	Brinker, Sarah v Roma Valley Apartments	06/01/06	Disability,	510 - Failure to make reasonable accommodation,	06/30/06	Withdrawn After Resolution	Conciliated/ Settled	Shelby Township	1
05-06-1329-8	Mitchell, Valerie v. Keystone Management Group/Memphis Manor	06/13/06	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,	06/27/07	No Cause	No Cause	Memphis	1
05-06-1570-8	Johnson, Monika vs. Woods Condominium Association	06/12/06	Race, Religion,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	09/18/06	Withdrawn After Resolution	Conciliated/ Settled	Chesterfield	1
05-06-1577-8	Billingsley, Joseph vs. ATL Residential LLC	07/20/06	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation,	11/16/06	Unable to Locate Complainant	Administrative Closure	Shelby Township	1

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

05-06-1732-8	Nichols, Carol v. Hanover Grove Consumer Housing Co-Op I	08/11/06	Disability,	510 - Failure to make reasonable accommodation,	10/29/07	Withdrawn After Resolution	Cause (FHAP)	Fraser	1
05-06-1790-8	Elfakir, Mohamad B. v Mt. Clemens Housing Commission	08/11/06	Disability, National Origin,	310 - Discriminatory refusal to rent,	08/30/07	No Cause	No Cause	Mt. Clemens	1
05-06-1874-8	Shoemaker, Jack v. Hidden Oaks Condo Association	09/12/06	Familial Status, Retaliation	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	10/30/06	Conciliated/Settled	Conciliated/Settled	Harrison Township	1
05-07-0113-8	Banks, Linda v MGA Homes, Inc.	10/16/06	Race,	300 - Discriminatory refusal to sell,	12/28/06	No Cause	No Cause	Washington Township	1
05-07-0614-8	O'Neal, John v Cornerstone Appraisal, LLC	12/18/06	Race,	356 - Discrimination in the appraising of residential real property,	05/10/07	No Cause	No Cause	Mt. Clemens	1

Cases Filed From Macomb County, MI - Calendar Year 2007

HUD Case Number	Case Name	HUD Filing Date	Bases	Issues	Closure Date	Closure Reason	Case Completion Type	Violation City	Number of Filed Cases
05-07-0451-8	Sobek, Tina v. Stamper and Company	01/23/07	Race,	320 - Discriminatory advertising, statements and notices, 382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	04/30/08	No Cause	No Cause	Roseville	1

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

05-07-0418-8	Marangos, Dimitrios v. (Powell, Cheryl)Lakeside Park Apartments	01/17/07	Retaliation	310 - Discriminatory refusal to rent,	06/30/07	No Cause	No Cause	Shelby Township	1
05-07-0534-8	Black, Corwanda v. Northport Apartments	02/21/07	Race,	382 - Discrimination in terms/conditions/privileges relating to rental,	02/29/08	No Cause	No Cause	Macomb	1
05-07-0557-8	Martin, Kevin vs Spring Hill Apartments	02/27/07	Race,	310 - Discriminatory refusal to rent,	05/31/07	No Cause	No Cause	Shelby Township	1
05-07-0638-8	Allen, Marcella v. Roseville Housing Commission	03/12/07	Race,	382 - Discrimination in terms/conditions/privileges relating to rental,	04/30/07	Conciliated/Settled	Conciliated/ Settled	Roseville	1
05-07-0735-8	Sanders, Beneva v Oak Hill Apartments	03/23/07	Race,	310 - Discriminatory refusal to rent,	06/29/07	No Cause	No Cause	Utica	1
05-07-1352-8	Muszall, Charline v. Wingate Management (Clinton Place Apts)	07/31/07	Race, Disability,	382 - Discrimination in terms/conditions/privileges relating to rental, 430 - Otherwise deny or make housing available, 510 - Failure to make reasonable accommodation,	12/06/07	Conciliated/Settled	Conciliated/ Settled	Mt. Clemens	1
05-07-1523-8	Hannah, Lakesha v. Garfield Commons Apts.	09/07/07	Familial Status,	382 - Discrimination in terms/conditions/privileges relating to rental,	01/16/08	Withdrawal Without Resolution	Administrative Closure	Clinton Township	1
05-07-1673-8	Moon, Kimberly v. Babcock Forest Cooperative	09/27/07	Race,	381 - Discrimination in terms/conditions/privileges relating to sale,	06/12/09	Conciliated/Settled	Conciliated/ Settled	Eastpointe	1
05-07-1676-8	Sharp, Daniel v. Millstone Pond Mobile Park	09/22/07	Race,	382 - Discrimination in terms/conditions/privileges relating to rental,	05/30/08	No Cause	No Cause	Lenox	1
05-08-0107-8	Hageman, Katherine v. Kapraun, Fritz, et al	10/30/07	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental,	05/05/09	No Cause	No Cause	Mt. Clemens	1

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

05-08-0180-8	Tucker Warren v Willow Point Mobile Home Park	11/01/07	Race	380-Discriminatory terms, conditions, privileges, or services and facilities	06/26/08	Withdrawal without resolution	Administrative Closure	Harrison Township	1
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Cases Filed From Macomb County, MI - Calendar Year 2008

HUD Case Number	Case Name	HUD Filing Date	Bases	Issues	Closure Date	Closure Reason	Case Completion Type	Violation City	Number of Filed Cases
05-08-0546-8	Zatorski, Norman v Woodside Manor Apartments	02/07/08	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 510 - Failure to make reasonable accommodation,	05/30/08	Withdrawn After Resolution	Conciliated/Settled	Fraser	1
05-08-0547-8	Marko, Tim v Woodside Manor Apartments	02/07/08	Disability,	510 - Failure to make reasonable accommodation,	04/30/08	Withdrawn After Resolution	Conciliated/Settled	Fraser	1
05-08-0529-8	Lipari, Nanette, v Stamper and Company	01/24/08	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental,	05/28/08	Conciliated/Settled	Conciliated/Settled	Fraser	1
05-08-0660-8	Hudson, Layla v Robert J. Bates Enterprises LLC	02/28/08	Disability,	310 - Discriminatory refusal to rent,	05/15/08	No Cause	No Cause	Fraser	1
05-08-0584-8	Asselin, Neil v. Charleston Condo Assc./Key Property Services	02/20/08	Disability,	510 - Failure to make reasonable accommodation,	06/27/08	Conciliated/Settled	Conciliated/Settled	Washington	1

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

05-08-0665-8	Skaggs, Robert v. Hometown America Management, LLC	03/07/08	Disability,	350 - Discriminatory financing (includes real estate transactions),	06/30/08	Withdrawn After Resolution	Conciliated/Settled	Macomb	1
05-08-0714-8	Moon, Kimberly v. Babcock Forest Cooperative	03/06/08	Race, Retaliation	381 - Discrimination in terms/conditions/privileges relating to sale,	06/12/09	Conciliated/Settled	Conciliated/Settled	Eastpointe	1
05-08-1097-8	Johnson, Stefanie v Crystal Lake Apts	05/23/08	Race,	382 - Discrimination in terms/conditions/privileges relating to rental,	06/25/08	No Cause	No Cause	Shelby Township	1
05-08-0955-8	Dedvukaj, Liliana v. Monterey Court Condominium	04/25/08	National Origin,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	08/26/08	No Cause	No Cause	Fraser	1
05-08-1176-8	Gruninger, Deborah v Shelby Park Manor Apartments	05/21/08	Disability,	384 - Discrimination in services and facilities relating to rental,	07/31/08	No Cause	No Cause	Shelby Township	1
05-08-1130-8	Williams, Larlene vs Michael A. Merkler	05/20/08	Race,	310 - Discriminatory refusal to rent,	09/30/08	Withdrawal Without Resolution	Administrative Closure	Macomb	1
05-08-1187-8	Mayfield, Hervin v. Woodside Manor Apartments	05/30/08	Race,	440 - Other discriminatory acts,	06/26/08	Withdrawal Without Resolution	Administrative Closure	Fraser	1
05-08-1318-8	Matthews, Valerie v Grant Manor Senior Apartments	06/20/08	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	07/31/08	No Cause	No Cause	Eastpointe	1
05-08-1570-8	Ogbonna, Cyril v. Kingston Manor Apartments	07/18/08	Race, Disability,	310 - Discriminatory refusal to rent, 410 - Steering,			Cause (FHAP)	Mt. Clemens	1
05-08-1607-8	Bradley, Sirquicia v. Staller	07/18/08	Race,	382 - Discrimination in terms/conditions/privileges relating to rental,	11/20/08	No Cause	No Cause	Eastpointe	1
05-09-0343-8	Smith, Joi v. Theresa A. Salinaz	12/15/08	Race,	312 - Discriminatory refusal to rent and negotiate for rental,	09/29/09	No Cause	No Cause	Roseville	1

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Cases Filed From Macomb County, MI - Calendar Year 2009

HUD Case Number	Case Name	HUD Filing Date	Bases	Issues	Closure Date	Closure Reason	Case Completion Type	Violation City	Number of Filed Cases
05-09-0509-8	Kora, Tyranesha v. PA Management	01/12/09	Race,	312 - Discriminatory refusal to rent and negotiate for rental,	10/29/10	Withdrawn After Resolution	Conciliated/ Settled	Richmond	1
05-09-0535-8	Lewis, Wendy v Unity Real Estate (19309 W. 14 Mile Rd)	01/21/09	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	06/25/09	No Cause	No Cause	Mt. Clemens	1
05-09-0537-8	Lewis, Wendy v Unity Real Estate (210 N. Christine)	01/21/09	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	06/25/09	No Cause	No Cause	Mt. Clemens	1
05-09-0564-8	Miller, Chareise v. Classic Real Estate	01/27/09	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	03/30/09	No Cause	No Cause	New Baltimore	1
05-09-0607-8	Munoz, Tina Louise v. New Haven Housing Commission	02/02/09	Disability,	310 - Discriminatory refusal to rent,	03/30/09	Withdrawn After Resolution	Conciliated/ Settled	New Haven	1
05-09-0675-8	Rodriguez, Lakeisha v. Apple Valley Townhomes	02/14/09	Race,	382 - Discrimination in terms/conditions/privileges relating to rental,	04/30/09	No Cause	No Cause	Romeo	1
05-09-1075-8	Gursinski, Terri v LeRoy Apartments	05/04/09	Disability, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities,	05/26/09	Withdrawn After Resolution	Conciliated/ Settled	Roseville	1
05-09-1176-8	Little, Zelta v Pebble Creek Apartments	05/22/09	Race, Familial Status,	310 - Discriminatory refusal to rent,	08/31/09	No Cause	No Cause	Shelby Township	1
05-09-1382-8	Elsholz, Joshua vs Prentiss Point Apartments	07/01/09	Familial Status,	382 - Discrimination in terms/conditions/privileges relating to rental,	11/28/09	No Cause	No Cause	Harrison Township	1
05-09-1542-8	Anderson, Cecilia v. Camelot Villa	07/27/09	Race,	350 - Discriminatory financing (includes real estate transactions),	11/30/09	No Cause	No Cause	Macomb	1

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05-09-1732-8	Turner, Beatrice v. Centerline Park Towers	08/24/09	Disability,	510 - Failure to make reasonable accommodation,	09/25/09	Withdrawn After Resolution	Conciliated/ Settled	Centerline	1
05-09-1731-8	LAD Fair Housing Center v. Poirier, Jr, Phillip J.	08/24/09	Religion,	322 - Discriminatory advertisement - rental,	08/31/10	Conciliated/Settled	Cause (FHAP)	Roseville	1
05-10-0205-8	Drane, Gwendolyn v. Park Place Towers	10/29/09	Race, Disability,	382 - Discrimination in terms/conditions/privileges relating to rental,	05/29/10	No Cause	No Cause	Mount Clemens	1
05-10-0287-8	Legal Aid and Defender v Kensington Place Apartments	11/20/09	Disability,	332 - False denial or representation of availability - rental, 380 - Discriminatory terms, conditions, privileges, or services and facilities,	07/30/10	Conciliated/Settled	Conciliated/ Settled	Roseville	1

Cases Filed From Macomb County, MI - Calendar Year 2010

HUD Case Number	Case Name	HUD Filing Date	Bases	Issues	Closure Date	Closure Reason	Case Completion Type	Violation City	Number of Filed Cases
05-10-0595-8	Bolden, James v Clinton Manor Apartments	02/08/10	Race,	382 - Discrimination in terms/conditions/privileges relating to rental, 384 - Discrimination in services and facilities relating to rental,	06/28/10	No Cause	No Cause	Harrison Township	1
05-10-0711-8	Legal Aid and Defender v. San Remo Villa Apartments	03/02/10	Disability,	332 - False denial or representation of availability - rental,	02/28/12	Conciliated/Settled	Conciliated/ Settled	Harrison Township	1
05-10-0954-8	Washington, Charles v. Hometown America Management, LLC	03/30/10	Race, Sex,	310 - Discriminatory refusal to rent,	08/30/10	Conciliated/Settled	Conciliated/ Settled	Macomb	1

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05-10-1373-8	Drane, Gwendolyn v Park Place Towers	06/09/10	Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities,	08/30/10	No Cause	No Cause	Mount Clemens	1
05-10-1260-8	Bolden, James v Clinton Manor Apartments	06/09/10	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 382 - Discrimination in terms/conditions/privileges relating to rental,	11/15/10	No Cause	No Cause	Harrison Township	1
05-10-1787-8	Spears, Mark v Harrison Court, Inc.	09/16/10	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental, 384 - Discrimination in services and facilities relating to rental,	03/31/11	No Cause	No Cause	Harrison Township	1
05-11-0141-8	Doebler v William Anthony v Woodside Manor Apartments	11/02/10	Disability,	510 - Failure to make reasonable accommodation,	12/27/10	Conciliated/Settled	Conciliated/Settled	Fraser	1
05-11-0212-8	Khan, Asif v. Oak Hill Apartments	11/10/10	National Origin, Religion,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing available, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	12/27/11	No Cause	No Cause	Shelby Township	1
05-11-0274-8	Dugan, Peggy v Fraser Woods Apartments	11/24/10	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental,	01/25/11	Withdrawal Without Resolution	Administrative Closure	Fraser	1
05-11-0360-8	Allen, Marcella v. Roseville Housing Commission	12/10/10	Race, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities,	05/26/11	No Cause	No Cause	Roseville	1

Analysis of Impediments to Fair Housing Choice - Macomb County and the City of Roseville, MI – January 2013

Cases Filed From Macomb County, MI - Calendar Year 2011

HUD Case Number	Case Name	HUD Filing Date	Bases	Issues	Closure Date	Closure Reason	Case Completion Type	Violation City	Number of Filed Cases
05-11-0490-8	Caporuscio, Robin v. Provident Funding	01/04/11	Sex,	353 - Discrimination in the terms/conditions for making loans,	12/20/11	No Cause	No Cause	Richmond	1
05-11-0548-8	Metevier, Gregory v. Aberdeen Village Condo Association	01/20/11	Disability,	381 - Discrimination in terms/conditions/privileges relating to sale,	06/07/11	No Cause	No Cause	Shelby Township	1
05-11-0641-8	Jones, Hazel v Shelby Park Manor Apartments	02/16/11	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 382 - Discrimination in terms/conditions/privileges relating to rental,	05/31/11	No Cause	No Cause	Shelby Township	1
05-11-0726-8	Daniels, Jason v Fourmidable Group Inc et al	03/09/11	Disability,	332 - False denial or representation of availability - rental, 510 - Failure to make reasonable accommodation,	01/31/12	No Cause	No Cause	Washington	1
05-11-1264-8	Dooley, Lucia vs. Concord Management et al	07/27/11	Race, Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	02/24/12	No Cause	No Cause	Shelby Township	1
05-12-0008-8		10/03/11	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental,			Open	Center Line	1
05-12-0067-8		10/03/11	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental,			Open	Center Line	1

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APPENDIX 7 - Survey Instrument

I. INTRODUCTION

THIS SURVEY IS FOR INFORMATIONAL PURPOSES ONLY AND ALL SURVEY RESPONDENTS IDENTITIES WILL REMAIN ANONYMOUS.

This survey is for the Analysis of Impediments to Fair Housing Choice (A.I.), a document required of Macomb County and the City of Roseville by the U.S. Department of Housing and Urban Development (HUD). The Federal Fair Housing Act prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, familial status, and disability.

II. BACKGROUND

HUD defines Impediments to Fair Housing Choice as:

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

If you have encountered a barrier/impediment to renting or buying a home because of your race, color, national origin, religion, family status, gender, disability, or sexual orientation, you may have experienced housing discrimination.

Examples of Possible Housing Discrimination:

- An agent refusing to sell, rent, or show available housing.
- A person only being shown housing in areas or neighborhoods of minority concentration.
- A landlord providing different housing services, or enforcing different rules, for minority tenants.
- A prospective tenant being told the dwelling is not appropriate for a family.
- A dwelling has an available sign, but prospective tenants are told it is not available.
- The existence of planning and zoning regulations that limit the ability or choices of certain groups to secure decent housing.
- A person being denied a loan, or getting a higher interest rate, because of being a member of a certain group.
- A person being denied a loan, or getting a different interest rate, because of buying in a minority neighborhood.

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III. SURVEY QUESTIONS

1. Do you live within the limits of Macomb County, or have your address listed as Macomb County?
 - Yes
 - No

2. In which part of Macomb County do you reside?
 - Armada (Village)
 - Armada Township
 - Bruce Township
 - Center Line
 - Chesterfield Township
 - Eastpointe (City)
 - Fraser (City)
 - Harrison Township
 - Lenox Township
 - Macomb Township
 - Memphis (City)
 - Mount Clemens (City)
 - New Baltimore (City)
 - New Haven (Village)
 - Ray Township
 - Richmond (City)
 - Richmond Township
 - Romeo (Village)
 - Roseville (City)
 - Shelby Township
 - Utica (City)
 - Washington Township
 - Other (please specify)

3. Which ethnic or cultural group do you consider yourself a member of? Please check one:
 - Anglo/White
 - African American/black
 - Hispanic/Chicano/Latino
 - American Indian/Native American
 - Asian/Oriental/Pacific Islander
 - Multiracial
 - Prefer not to answer
 - Other (please specify): _____

4. What is your current marital status? Please check one.
 - Married
 - Single head of household

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- Domestic partners
- Divorced
- Widowed
- Prefer not to answer

5. Which income category does your total household income fall into? Please check one:

- Less than \$20,000
- \$20,001 to \$30,000
- \$30,001 to \$40,000
- \$40,001 to \$50,000
- \$50,001 to \$60,000
- \$60,001 to \$70,000
- \$70,001 or more
- Prefer not to answer

6. Do you, or someone in your household, qualify as a “protected class” according to the Fair Housing Act? (Please see next question for a list of protected classes.)

- Yes
- No

7. If you answered "Yes" to question #6, to which protected class do you/your household belong? (check all that apply)

- Race
- Color
- Religion
- Sex
- National Origin
- Familial Status (family with one or more persons under 18 years of age)
- Disabled/handicapped

8. Do you have children under the age of 18 years?

- Yes
- No

9. Housing discrimination can occur if someone is denied housing or housing financing based on which of the following categories (check all that apply):

- Race
- Color
- Religion
- Sex
- Disability/Handicap
- Family Status (family with one or more persons under 18 years of age)
- National Origin
- Age
- Sexual Orientation
- Poor English Language Skills
- Citizenship Status

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- Level of Income
- Source of Income (public assistance)
- Other (please list) _____

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

- Very Knowledgeable
- Somewhat Knowledgeable
- Not Knowledgeable

11. Have you or anyone you know ever experienced housing discrimination in Macomb County?

- Yes, I have
- Yes, a person I know has
- No

12. If yes, which of the following best describes the person or organization that discriminated against you or the person you know?

- rental property manager/owner
- seller of a housing unit
- condominium or homeowner's association
- real estate professional
- loan officer or mortgage broker
- municipal employee
- other (please list) _____

13. What best describes the location where the discrimination occurred?

- rental apartment complex
- individual housing unit for rent
- single family housing unit for sale
- condominium for sale
- real estate office
- lending institution
- Public Housing Authority
- City office
- other (please list) _____

14. What do you believe was the basis for the discrimination you or the person you know experienced?

- Race
- Color
- Religion
- Sex
- Disability/Handicap
- Family Status
- National Origin
- Age
- Sexual Orientation

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- Poor English language skills
- Citizenship Status
- Level of Income
- Source of Income (public assistance)
- Other (please list):

15. What do you see as current impediments to fair housing choice, if any, Macomb County?

- Race
- Color
- Ethnicity
- National Origin
- Sex
- Sexual Orientation
- Family Status
- Disability
- Age
- Insufficient Income
- Lack of sufficient quality affordable housing
- Insufficient public transportation
- Municipal codes, ordinances, or regulations
- Other (please list): _____

16. Do you feel your housing choices are geographically limited to certain areas or neighborhoods in Macomb County?

- No
- Yes

If yes, on what basis? (you may select from list above at question #14):

17. Do you think that affordable housing options are located throughout Macomb County, or are they concentrated in certain areas/neighborhoods?

- Spread throughout Macomb County
- Concentrated in certain areas/neighborhoods, such as:

18. Do you perceive certain geographic areas or neighborhoods within Macomb County to be undesirable?

- No
- Yes

If yes, please identify: _____

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

- Yes
- No

Why/why not? _____

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

- Yes
- No

Why/why not? _____

21. Do you feel there is an adequate supply of affordable housing that is available to senior citizen residents?

- Yes
- No

Why/why not? _____

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

- Yes
- No

Why/why not? _____

23. What did you do, or would you do, if you were discriminated against in housing choice? (Check all that apply)

- Nothing
- I wouldn't know what to do
- Complain to the individual/organization that discriminated against me
- Contact County offices
- Contact my elected municipal representative
- Contact a local fair housing organization
- Contact HUD
- Contact a private attorney
- Contact the City Attorney
- Contact the State Attorney General
- Other (please identify):

24. Are you familiar with fair housing services or other social services provided by Macomb County?

- Yes
- No

List the County services you know of such as senior, youth, disability, and employment services. Provide names/descriptions, if possible.

25. Have you seen or heard information regarding fair housing programs, laws, or enforcement within Macomb County?

- Yes
- No, (please skip to question #27)

26. If you answered yes to question #25, what information have you seen/heard? (check all that apply):

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- fair housing flyers or pamphlets
- fair housing handbook
- fair housing public service announcement on the radio
- fair housing public service announcement on the television
- fair housing information at a public event
- other (please list): _____

27. Do you think that adequate fair housing information is available in other language translations?

- Yes
- No

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

- Very Effective
- Somewhat Effective
- Not Effective

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

- public meeting(s)
- fair housing literature/information in public libraries and government bldgs
- television advertisements/announcements
- radio advertisements/announcements
- bilingual advertisements/announcements
- information on the County/City websites
- other (please describe):

30. Do you have any suggestions for changes to fair housing laws and practices that would increase fair housing choice and/or remove impediments to fair housing choice?

If yes, please list:

31. Please list below what additional actions would you suggest that Macomb County could take to address impediments and improve fair housing choice for all residents:

IV. SURVEY COMPLETION

THANK YOU FOR PARTICIPATING IN THE FAIR HOUSING SURVEY. YOUR RESPONSES WILL INFLUENCE IMPORTANT FAIR HOUSING PLANNING DECISIONS MADE BY MACOMB COUNTY AND THE CITY OF ROSEVILLE.