



Holland
MICHIGAN

City of Holland **Assessment to Fair Housing**

FINAL · MARCH 27, 2024



City of Holland

Assessment of Fair Housing

FINAL – March 27, 2024

Single Program Participant
Consolidated Plan Participant
Time period covered: 2015 – 2022
New AFH

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01. Introduction

The City of Holland has prepared this Assessment of Fair Housing, with assistance from McKenna. This document analyzes the various potential impediments to fair housing choice throughout the city.

Why Fair Housing?

Since 1968, the United States Government, by way of the U.S. Department of Housing and Urban Development (HUD), has required all recipients of HUD funding to:

...certify that they take meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. (HUD Interim Final Rule, July 31, 2021)

While effectively “repealed” with the “Preserving Neighborhood and Community Choice (PCNC)” rule of 2020, HUD’s Interim Final Rule, entitled Restoring Affirmatively Furthering Fair Housing Definitions and Certifications, which went into effect in July of 2021, restores the substantive definitions as established in the 2015 AFFH rule, and reinstates the requirement that HUD participants certify their compliance with AFFH and take meaningful steps to address the fair housing challenges in their jurisdictions.

But Fair Housing is a crucial value of the City of Holland and therefore we advocate for fair housing for reasons beyond Federal requirements. Fair housing is about ensuring that the housing needs of marginalized and vulnerable populations (e.g., people with disabilities, minority groups, single parent households with children, etc.) are not overlooked, but rather are addressed proactively. We believe this will help ensure housing stability among not only these, but among all of our communities. On the other hand, housing discrimination is inherently unfair because it disregards some of the legal rights of affected individuals and families and thereby creates an uneven playing field for them in the housing market. This distorts the housing market, which inhibits their ability to be upwardly mobile and reduces their quality of life.

Current HUD-funded Programs

Holland is a HUD entitlement community. It receives an annual allocation of Community Development Block Grant (CDBG) funds directly from HUD. Were the City to not have the entitlement community designation, it would have to seek all of its HUD funding from the State, Ottawa/Allegan Counties, and/or a neighboring entitlement jurisdiction.

The City of Holland's Community & Neighborhood Services Department (CNS) is responsible for administering the program. CDBG funds are intended to help develop viable urban communities that offer decent, affordable housing, a suitable living environment, and expanded economic opportunities. Funded projects and activities must principally benefit low and moderate-income persons or neighborhoods.

The City currently administers an ongoing CDBG-funded Home Repair Program, including a Home Energy Retrofit option for participating residents.

The City also regularly sub-allocates up to 15% of its annual CDBG allocation to support local public services carried out by non-profit partners, and regularly sub-allocates funding to support fair housing education, outreach and testing carried out by the Fair Housing Center of West Michigan (FHCWM).

02. Community Participation Process

Outreach Activities

This Assessment was updated over a period of six (6) months, starting in February of 2023 and concluding with the submittal of the draft plan in late July 2023. The City of Holland held one Public Workshop to obtain public and stakeholder input at 6:00 PM on Thursday, May 18, 2023. The event was held at City Hall in City Council Chambers, a room often used by the City for public outreach events. An event flyer was created, and invitations sent via email to both the Continuum of Care (CoC) listserv and from Community & Neighborhood Services to an additional list of organizations. The event was also publicized in the local paper of record, the Holland Sentinel, as well as on the City of Holland Facebook page.

The McKenna team also conducted over 20 phone interviews with the executives and key staff of local and regional non-profit, community based, and social service organizations regarding the state of fair and affordable housing in the City.

Public Feedback

Public Workshop

Approximately 10 people attended the May 18th Public Workshop. In order to get the most honest and reliable anecdotal data, every effort was made to provide forum participants with a safe and secure space where they could share their opinions and experiences. For this reason, participants were not asked to provide any identifying information such as their name or contact information. Instead, participants were asked only to identify themselves based on their current relationship to housing in Holland (e.g., renter, homeowner, landlord, etc.). The result was a highly informative and insightful conversation that helped provide a deeper context to the quantitative and regulatory data outlined in this report.

Several common themes emerged over the course of the evening which, while scheduled to run from 6 to 7:30 PM, wrapped up well after 9:00 PM due to the high level of engagement and interest in the subject expressed by the participants.

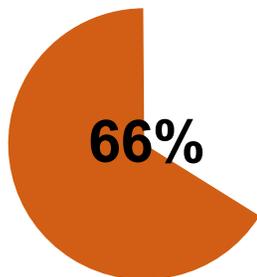
Community Opposition to New Housing

Several workshop participants stated that there is an underlying and irrational fear of multifamily housing on the part of many residents. Multiple family homes— and in particular rental properties— are viewed as detrimental to neighborhood property values. Renters are often viewed as transients with little connection to the existing neighborhood.

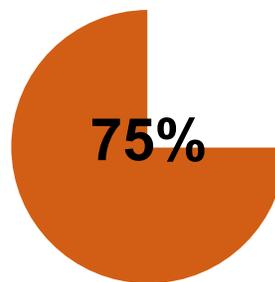
During the initial presentation by McKenna staff, a couple of slides were shown which compared resident responses to a series of questions posed in Communitywide Survey for the 2023 Holland Comprehensive Plan. These slides are reproduced below:

Holland Master Plan Survey Results (Preliminary)

“Holland Needs a Wider Variety of Housing”



“Holland should promote housing diversity”

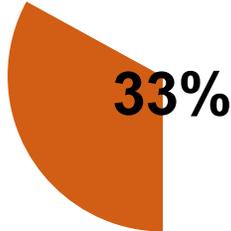


But...

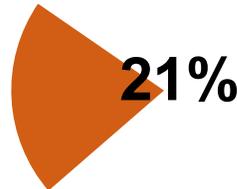
CITY OF HOLLAND • ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING • MAY 18, 2023

Holland Master Plan Survey Results (Preliminary)

“My neighborhood needs a wider variety of housing”



“My neighborhood has vacant or undeveloped sites that would be good for new housing.”



CITY OF HOLLAND - ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING - MAY 16, 2023

Several attendees responded affirmatively with the apparent disconnect in sentiment toward affordable housing on the part of City residents shown in the slides. One workshop participant, however, noted that they viewed their neighborhood as being synonymous with their subdivision, and that there were no vacant lots there. The same participant also noted that they weren't thinking about their neighborhood as a larger area when they answered the survey question. Two other participants added:

“People don't know what affordable housing looks like. How do you communicate what this is?”

“Affordable Housing is seen as synonymous with subsidized housing, which has negative connotations.”

There appeared to be at least some agreement among workshop participants that there was a collective responsibility to provide City residents with more affordable housing options:

“One thing we know for sure, we cannot stay the same.”

“We need a group to come together in opposition to the negative voices.”

Other issues that were raised by workshop participants:

Rental Challenges

“Landlords are concerned about who their tenants are.”

“Hard to find housing for people with disabilities – Landlord won’t install accommodations. Is that discrimination or cost concerns? City or State dollars could help landlords with accessibility?”

“In Ottawa County people without money are at the whim of their landlord and the market. Difficult to find stable affordable housing.”

“I would be ok with apartments “if it could be done right” – Blended into existing community character (visually, style-wise).”

Market Perceptions

“Demand is going up, not sure if it has stabilized.”

“A lot of home sales aren’t “disclosed” -- sold off-market, by word-of-mouth – makes it exclusive to people who are in the same circles.”

“People from outside the city are buying up the housing stock to rent out for retirement, 2nd homes. Driving the cost up, creating more rentals.”

“Are there ways to partner with other local jurisdictions for housing? Outside the city seems to have more space, Holland is built up.”

Student Housing

“Hope College owns private housing, which takes housing off the market.”

“Does off-campus housing, if owned by the College, still have to abide by federal fair housing laws?”

Challenges for Seniors and People with Disabilities:

(From a workshop participant who identified themselves as a senior citizen)

“I want to buy a smaller house but I can’t find anything that’s in my price range in the area that is for sale (not many are selling).”

(From a workshop participant who identified themselves as a senior with mobility difficulty)

“I want to age in place. I was trying to add a ramp to our ranch home onto our patio – the ramp went within the setback and I had to get a variance. The Builder said I should request the variance based on disability status. I was approved, but it took the better part of a year, added a lot of time to the process. Going to be more of an issue in the future with the number of seniors in Holland.”

“Accessible and Affordable – What can we do to get builders to create more affordable and accessible housing instead of housing with the highest profit margin?”

Additional Event Feedback

One attendant didn’t want to come in person, checked if it would be online – suggested streaming in the future.

Phone Interviews

Those interviewed for the AI represented a wide range of stakeholders and included local and regional non-profits and social service providers, community leaders and elected officials, and for-profit developers and landlords. Multiple interviewees identified the same or similar impediments to fair and affordable housing in the City. These impediments reflect the challenges faced by vulnerable populations and highlight the need for comprehensive strategies to address housing disparities effectively. These included:

1. **Limited Affordable Housing Stock:** Nearly all of those interviewed agreed that of the most significant challenges is the shortage of affordable housing units. Community leaders, social service providers, and for-profit builders alike expressed concerns about the lack of available affordable housing options as well as the lack of land on which to build. There was also relative consensus that government, including local government, should be part of the solution to the City's housing crisis.
2. **Community Opposition and Resistance to Change:** Many of those interviewed cited neighborhood resistance to the development of both multiple family and affordable housing as a key impediment to the diversification of housing options for people in the City. Several interviewees attributed this to a lack of understanding on the part of residents regarding what affordable housing is and whom it was designed to serve.

However, the impact of additional density on the environment, transportation systems, infrastructure, and public services must be evaluated when new housing is proposed. These impacts are not necessarily readily identifiable without both input from local residents and objective data to guide decision making by City leaders.
3. **Discrimination and Bias:** Interviewees highlighted the persistence of housing discrimination and bias, particularly against racial and ethnic minorities, individuals with disabilities, and families with children. Several interviewees cited the need for more fair housing compliance education for small and independent landlords. One interviewee mentioned the effect of home "pre-sales", which prevents some for-sale homes from ever entering the open market.
4. **Language and Cultural Barriers:** Several local and regional non-profit leaders noted that language and other cultural and community barriers have prevented many Limited-English-Proficiency (LEP) residents from accessing needed housing resources and accurate information. This has cut both ways, with Hispanic immigrant and Latino/a communities remaining "under the radar" and just out of reach of fair housing enforcement agencies who have been working over the years to address fair housing complaints in those communities. One local community leader noted that the "culture of positivity" that tends to dominate much of the City often effectively discourages vulnerable groups from coming forward in reporting discrimination and other housing violations.
5. **Insufficient Housing and Wraparound Support Services:** Many interviewees cited a need for expanded housing support services, particularly for people with disabilities and/or mental illness to help individuals and families overcome barriers to housing access as well as maintain housing stability. Many said that, while such support services existed, they were either not available consistently or in all areas of the City.
6. **Inadequate Public Transportation:** Sentiments were mixed on the part of those interviewed regarding universal access to the City's public bus system. While many interviewees praised the existing network and bus schedule, others stated that service was not consistent throughout the entire City and did not serve all areas equally. Others stated that the current bus system was not accessible for people with physical or developmental disabilities.

To address these impediments, community leaders and social service providers emphasized the importance of collaboration among various stakeholders, including government agencies, nonprofit organizations, developers, and the community. They tended to advocate for a mixed, holistic approach which employed a variety of strategies. These included expanding the affordable housing stock, combating discrimination through a combination of community, landlord, and tenant education as well as enforcement, investing in comprehensive support services, and ongoing and expanded community engagement to develop sustainable and equitable housing solutions for all residents.

03. Demographic Analysis

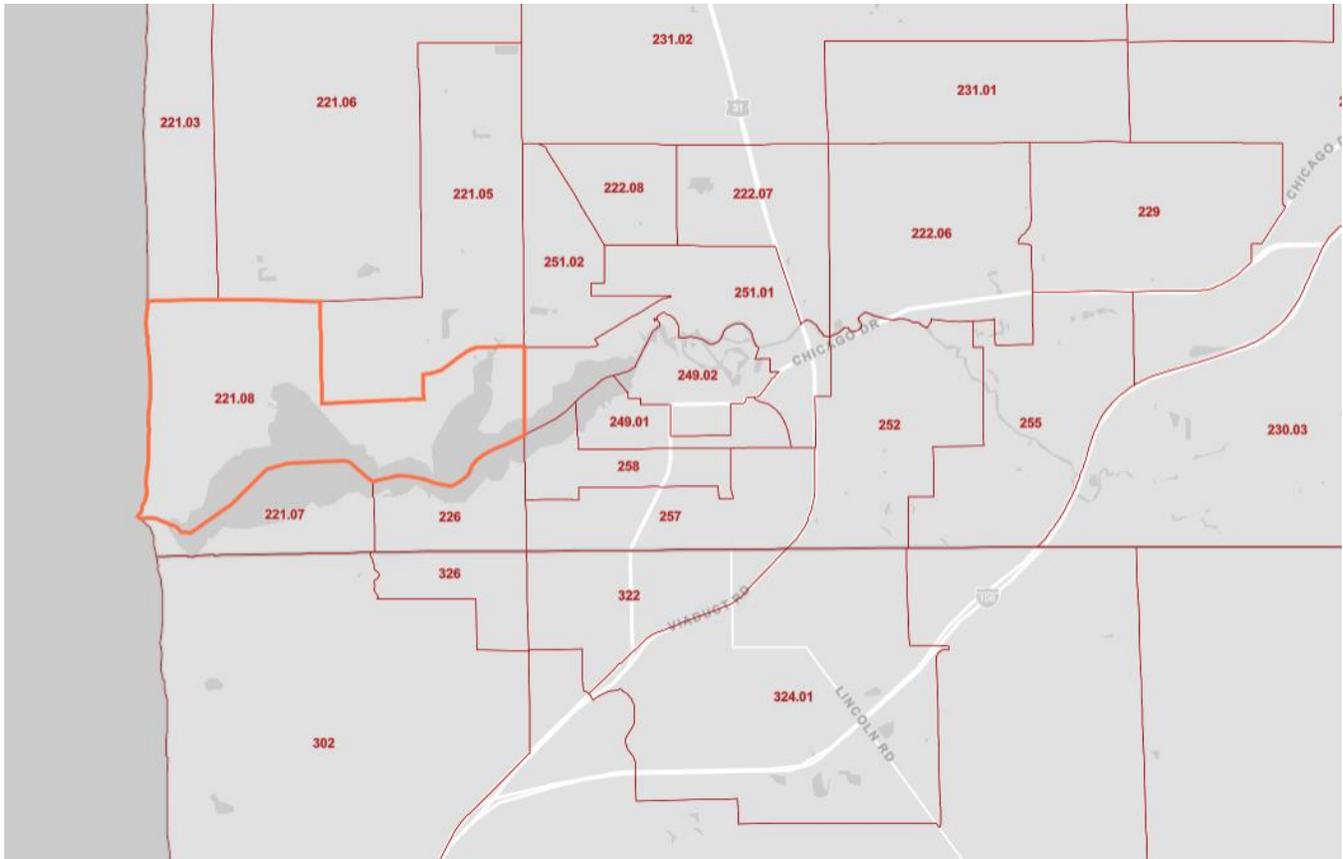
Data can showcase a community profile of Holland that allows the City to analyze potential impediments to fair housing choice, especially those based on demographic factors like age, household size, and race.

The data utilized in the following quantitative analysis was derived, primarily, from the 2020 United States Decennial Census and HUD's Affirmatively Furthering Fair Housing (AFFH) data analysis tools. In some cases, the 2021 US Census American Community Survey 5-Year Estimates are also used.

Description of Jurisdiction

The jurisdiction covered by this Analysis of Impediments is the City of Holland, Michigan (the City). The population of Holland, according to the 2020 Census, is 34,378 residents. Holland is located in West Michigan, approximately 25 miles southwest of Grand Rapids. The City straddles two counties, Ottawa County in the North and Allegan County to the South, with the County line along 32nd Street. Holland has an area of approximately 17.5 sq. miles. The City of Holland abuts Lake Macatawa and is just east of the Lake Michigan shoreline.

Map 1: Census Tracts in and around the City of Holland



Source: U.S. Census 2020

Demographic Profile

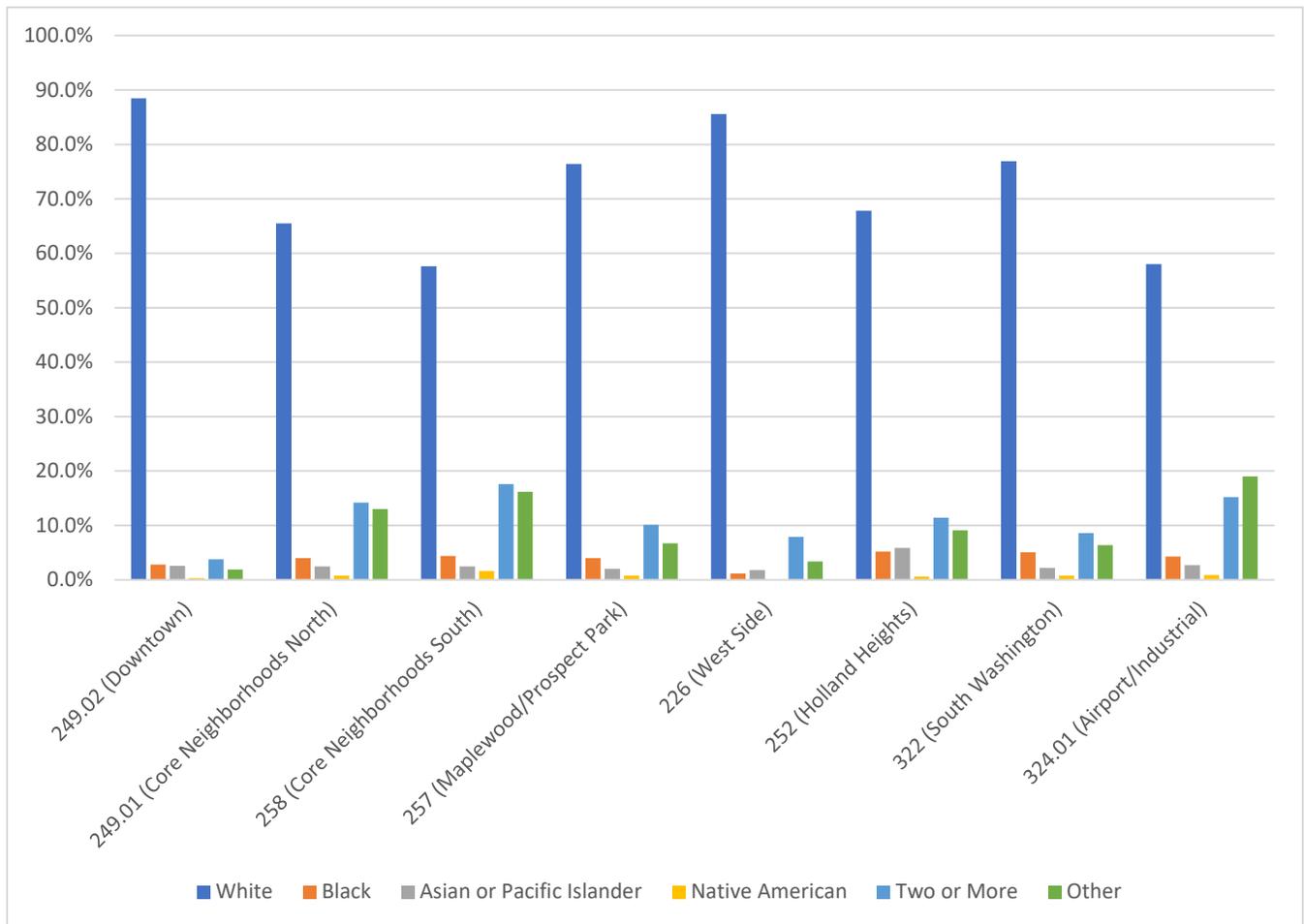
Table 1 shows the demographic information on the City of Holland from the 2020 Census and AFFH data. Table 2 shows the change in demographics every 10 years from 1990 to 2020 for Holland. These trends help further explain the population and population patterns in the City.

Table 1: Demographic Data, City of Holland, HUD AFFH Table 1 (2020)

Race/Ethnicity	Number	Percent (%)
White, Non-Hispanic	22,398	67.2%
Black, Non-Hispanic	1,862	5.6%
Hispanic	7,438	22.3%
Asian or Pacific Islander, Non-Hispanic	661	2.0%
Native American or Alaska native	489	1.5%
Two or More Races, Non-Hispanic	916	2.7%
Some Other Race, Non-Hispanic	11	0%
Sex		
Male	16,206	48.6%
Female	17,123	51.4%
Age		
Under 18	6,925	20.8%
18-64	21,035	63.11%
65+	5,369	16.12%
Family Type		
Families with Children	3,586	47.09%
National or Regional Origin (Foreign-Born)		
Total Foreign-Born	2,315	6.9%
Mexico	1,142	49.3%
South Eastern Asia (Laos, Cambodia, Vietnam, Malaysia)	245	10.6%
Other Africa (Nation not available)	212	9.2%
Caribbean (Cuba, Jamaica)	171	7.4%
Eastern Europe (Croatia, Russia, Poland)	112	4.8%
Other Central America (Guatemala, El Salvador)	101	4.4%
Eastern Asia (China, Japan, Korea)	98	4.2%
Canada	66	2.9%
Western Europe (Germany, Netherlands)	57	2.5%
Northern Europe (Sweden, UK, Denmark)	39	1.7%
Western Asia (Lebanon, Israel)	25	1.1%
Eastern Africa (Ethiopia, Other)	21	0.9%
India	14	0.6%
Middle Africa (Democratic Republic of Congo)	6	0.3%
South America (Venezuela, Chile)	5	0.2%

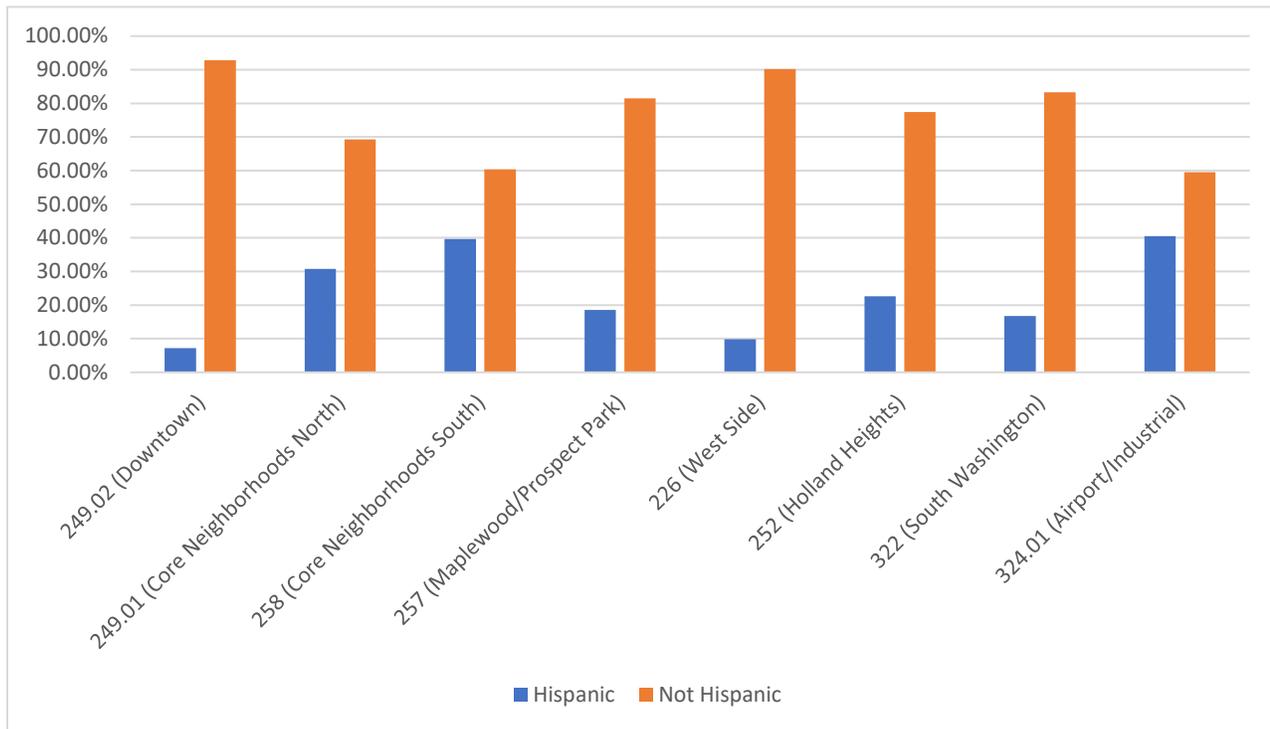
Source: U.S. Census 2020 American Community Survey Table S0201, HUD AFFH version AFFHT0006 released July 2020
 Nations listed in parentheses are those national origins within the specified regional group that are present in Holland.

Figure 1: Racial Identity by Census Tract



Source: US Census 2020

Figure 2: Hispanic Identity by Census Tract



Source: US Census 2020

Table 2: Demographic Trends (1990-2020), City of Holland

Race/Ethnicity	1990		2000		2010		2020	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
White, Non-Hispanic	24,914	81.16%	24,492	69.92%	22,852	69.05%	22,398	67.2%
Black, Non-Hispanic	296	0.96%	960	2.74%	1,358	4.10%	1,864	5.6%
Hispanic	4,423	14.41%	7,823	22.33%	7,484	22.62%	7,438	22.3%
Asian or Pacific Islander, Non-Hispanic	925	3.01%	1,366	3.90%	1,147	3.47%	661	2.0%
Native American, all races	83	0.27%	218	0.62%	201	0.61%	489	1.5%
National Origin								
Foreign Born	2,143	6.97%	3,718	10.61%	3,650	11.03%	2,315	6.9%
Limited English Proficiency (LEP)								
LEP	1,809	5.88%	3,296	9.41%	2,880	8.70%	1,471	4.4%
Sex								
Male	14,547	47.31%	16,667	47.58%	15,733	47.54%	16,206	48.6%
Female	16,204	52.69%	18,361	52.42%	17,360	52.46%	17,123	51.4%
Age								
Under 18	8,351	27.16%	9,617	27.46%	7,885	23.83%	6,925	20.8%
18-64	18,252	59.35%	20,781	59.33%	20,597	62.24%	21,035	63.11%
65+	4,148	13.49%	4,630	13.22%	4,611	13.93%	5,369	16.12%

Source: HUD AFFH version AFFHT0006 released July 2020

Foreign-Born Residents

According to the 2020 American Community Survey, just under 7% of residents of Holland were born outside the United States. This is a return to 1990 numbers, and greater than a 1/3 reduction from 2010 to 2020. This could be a result of a number of factors, including the possibility of underreporting, which was a common issue in 2020. Of the foreign-born population, the American Community Survey estimated that half (49.3%) were originally from Mexico. 10% of the foreign-born population was from Southeast Asia, primarily Laos and Cambodia. The next largest-population group, representing 9.2% of foreign-born residents, were from Africa, though unfortunately the Census did not provide specific national origins for this group. Other groups represented much smaller portions of the foreign-born population, representing a wide variety of nations of origin, and can be found in Table 1. Despite the region's history as a destination for immigrants from the Netherlands, there are only 57 individuals living in the City that were born in Western Europe.

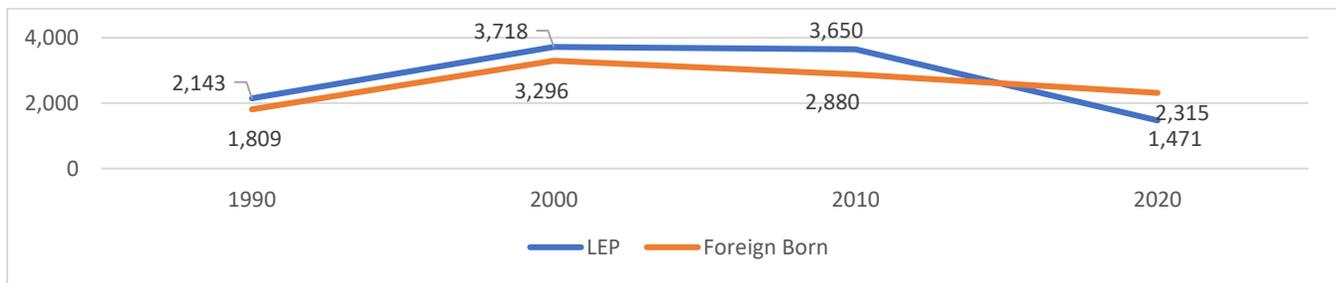
Large-scale immigration to the Holland area was rare between the initial Dutch migration in the 19th Century and approximately 1990. While there are over 2,300 foreign-born individuals in the City of Holland today, and even more in the wider region, the Holland community lacks many of the informal systems of community support that are found in regions that experienced higher rates of immigration during the 20th Century.

Strong neighborhood organizations, however, do exist within the City of Holland, and can be leveraged to provide the support networks needed for new residents. Further, social isolation is not unique to immigrant groups or to the Holland area, and is a growing concern nationally and internationally. Proactive steps must be taken to unite communities and support the development of social capital and economic mobility.

Limited English Proficiency

The proportion of the population classified as being of Limited English Proficiency (LEP) in Holland has decreased by nearly 50% over the past 10 years, according to estimates by the American Community Survey. 1,471 residents (4.4%) were estimated to speak English “less than very well” in 2020. 82% of the LEP population speaks Spanish as their primary language. Other languages spoken in Holland by speakers with limited English proficiency include “Indo-European languages”, “Asian and Pacific Islander languages”, and “other languages”.

Figure 3: Limited English Proficiency and Foreign-Born Population, 1990-2020



Source: HUD AFFH version AFFHT0006 released July 2020

Disability

More than 1 in 10 residents of Holland has a disability – 4,408 according to the 2021 ACS. The census distinguishes six different types of disabilities: cognitive, ambulatory, independent living, hearing, vision, and self-care difficulties. Many individuals with disabilities will have more than one difficulty, so the sum of the population with each type of disability will be greater than the number of people with disabilities. Ambulatory (walking) difficulties are the most prevalent in Holland with 2,028 residents (6.3%), followed closely by cognitive difficulties with 1,965 (6.1%), and independent living difficulties with 1,257 (4.7%). Hearing difficulties are experienced by 1,141 residents (3.4%), self-care difficulties by 751 residents (2.3%), and vision difficulties by 620 residents (1.8%).

Table 3: Disability Types, City of Holland, HUD AFFH 2021

Disability Type	Number	Percent of Total Population
Hearing Difficulty	1,141	3.4%
Vision Difficulty	620	1.8%
Cognitive Difficulty	1,965	6.1%
Ambulatory Difficulty	2,028	6.3%
Self-Care Difficulty	751	2.3%
Independent Living Difficulty	1,257	4.7%
Total Disabled Population	4,408	13%

Source: HUD AFFH version AFFHT0006 released July 2021

Sex, Age, and Household Types

In Holland, 51.4% of the population is female and 48.6% of the population is male. This proportion has remained relatively consistent over the past 40 years.

There are 6,925 residents of Holland under the age of 18, 20.8% of the City’s population. There are 5,369 residents ages 65 and older, 16.1% of the population. There was a drop of about 4% of the population under 18 from 2000 to 2010, likely demonstrating the largest generation, Millennials, coming of age in that decade. There has been an 16% increase in senior citizens in Holland, with an estimated 5,369 residents over the age of 65 representing 16% of the city’s population.

There are 12,535 Household Units in the City of Holland, with an average household size of 2.42. There are 7,459 Families living in the City of Holland, with an average household size of 3.09. About one third (30.9%) of the households in Holland have one or more people under 18 years old, and another 31% has people over the age of 65. There are slightly more than 4,000 households of people living alone, 32.5% of the total population – half of those households are individuals over the age of 65.

Table 4: Household Data, City of Holland

Households and Families	
Total Households	12,535
Average Household Size	2.42
Total Families	7,459
Average Family Size	3.09

Household Types	Number	Percentage
Households with one or more people under 18 years	3,873	30.9%
Households with one or more people 65 years and over	3,961	31.6%
Householder living alone	4,074	32.5%
Householder living alone 65 years and over	1,892	15.1%

Source: 2021 American Community Survey 5-Year Estimates Table DP02

Understanding and Identifying Segregation

HUD considers the thresholds appearing in Table 5 below to indicate low, moderate, and high levels of segregation:

Table 5: Interpreting the Dissimilarity Index

Measure	Values	Description
Dissimilarity Index [range 0-100]	<40	Low Segregation
	40-54	Moderate Segregation
	>55	High Segregation

The “dissimilarity index” provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the

composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast, if one population is clustered entirely within a single Census tract, the dissimilarity index score for the city will be 100. The higher the dissimilarity index value, the higher the level of segregation in an area.

Table 6: Race/Ethnicity Dissimilarity Index Released 2020, City of Holland

Race/Ethnicity	Index
Non-White/White	33.64
Black/White	23.89
Hispanic/White	38.10
Asian or Pacific Islander/White	34.42

Source: HUD AFFH version AFFHT0006 released July 2020

Table 7: Race/Ethnicity Dissimilarity Index Trend (1990-2020), City of Holland

Dissimilarity Index Trends	1990	2000	2010	2020
Non-White/White	35.0	24.0	23.5	33.6
Black/White	17.1	18.7	14.7	23.9
Hispanic/White	39.5	29.6	25.8	38.1
Asian or Pacific Islander/White	25.7	21.5	30.3	34.4

Source: HUD AFFH version AFFHT0006 released July 2020

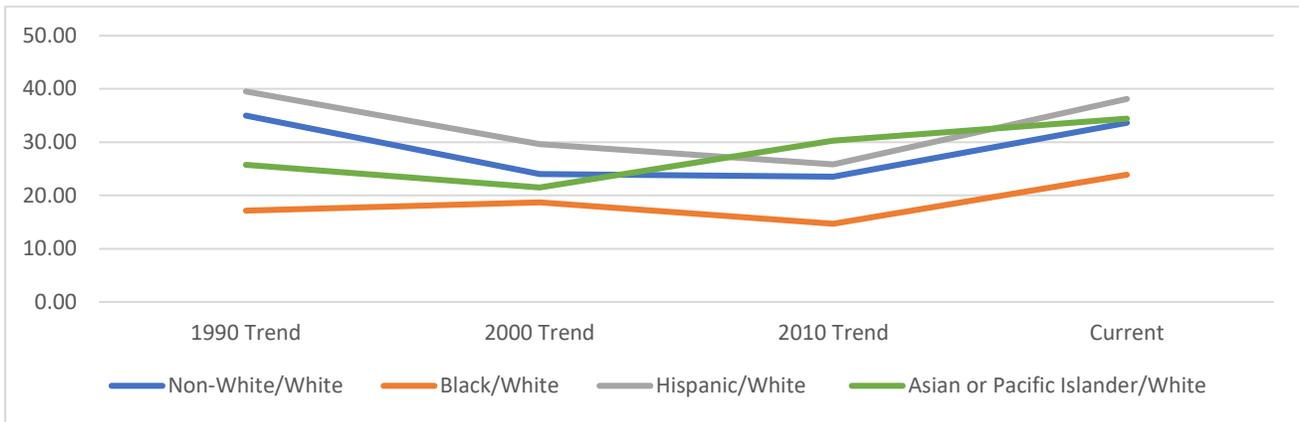
Tables 6 and 7 show dissimilarity indices for the City of Holland. All of Holland’s Index scores are below 40, meaning there is not a high amount of segregation in the city. It is notable, however, that the City does not have very high populations of racial and ethnic minorities overall, so this is not unexpected. Three of the four index scores do fall within the 30 to 39 range, which is close to the threshold for moderate segregation. The highest score is that between Hispanic and White individuals, with a score of 38.1.

The Hispanic population of the region has grown, but the community’s numbers are stagnant/declining in the City of Holland. Segregation between these groups could become more prevalent in upcoming years, both within the City, and within the broader region, as housing prices in Holland’s central neighborhoods continue to rise.

There is low, but not non-existent segregation between Asian and White residents of the city, with a score of 34.4. The more general category comparing segregation between White and Non-White persons has a score of 33.6. The lowest amount of segregation is between White and Black residents, with a 23.9 – significantly lower than all other groups. It is relevant to note that the populations of minorities other than Hispanics are low, so detecting segregation at the census tract level would be unlikely even if there were small scale racial or ethnic enclaves in the city.

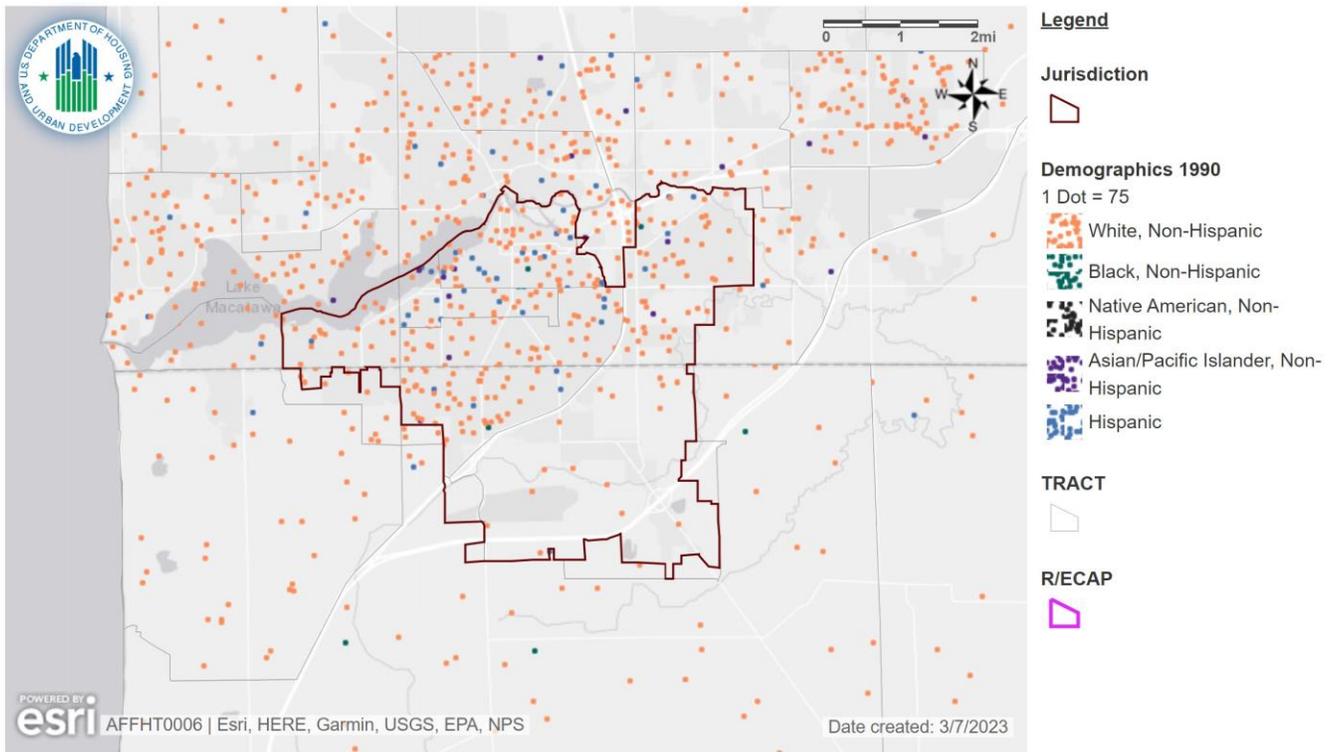
In general, segregation in Holland was decreasing until 2010, but has increased in the decade since. One potential reason for the increase may be the rapid rise in home values, especially in Holland’s core neighborhoods, since 2010. This increase may be pricing out immigrant and minority households, who then seek more affordable housing in other parts of the City, or in neighboring communities like Holland Charter Township.

Figure 4: Trends in Dissimilarity Index

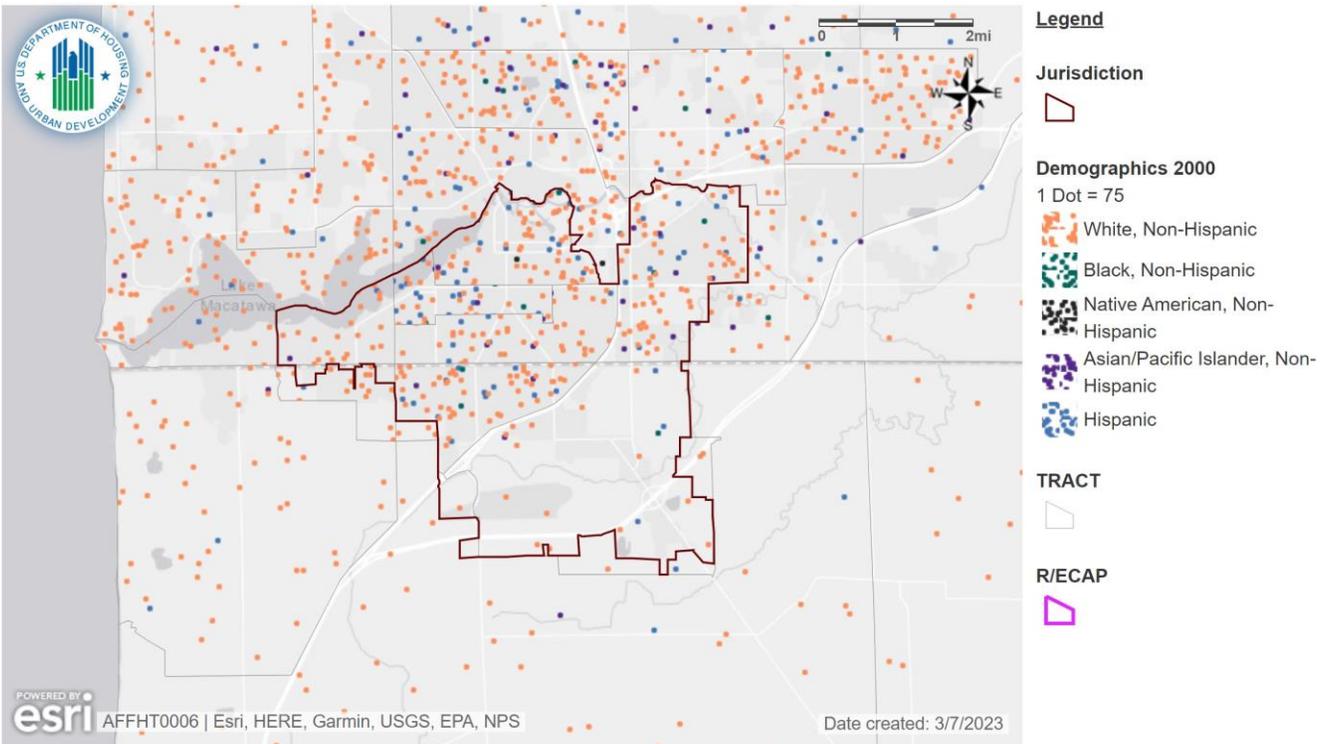


Source: HUD AFFH version AFFHT0006 released July 2020

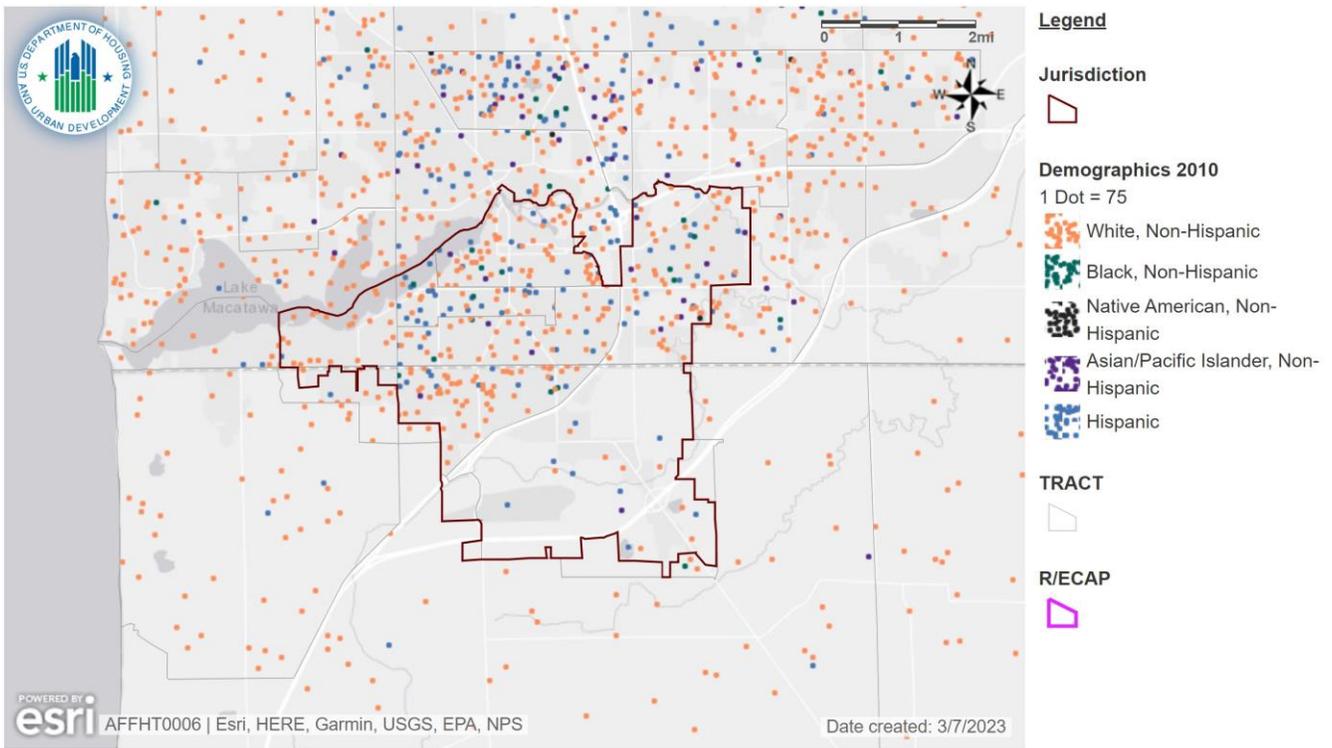
Map 2: Past Race/Ethnicity Density (1990), City of Holland



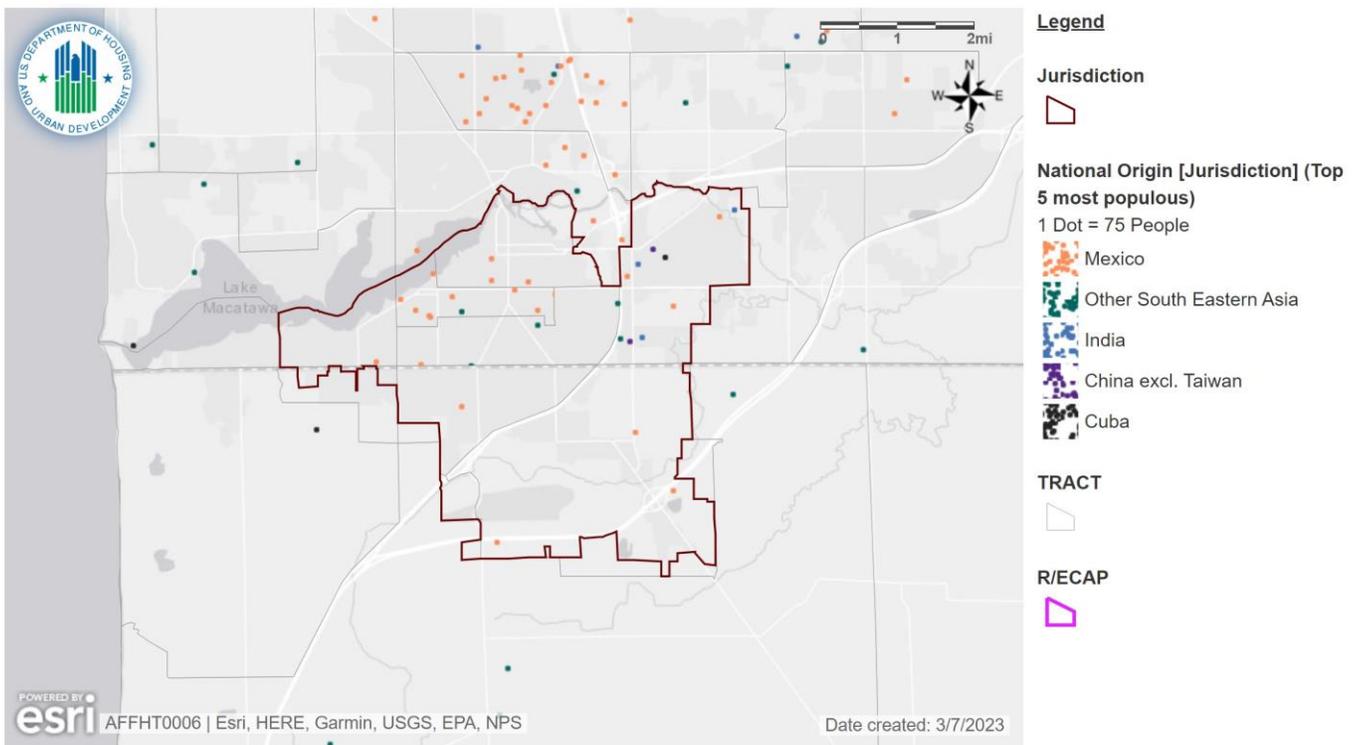
Map 3: Past Race/Ethnicity Density (2000), City of Holland



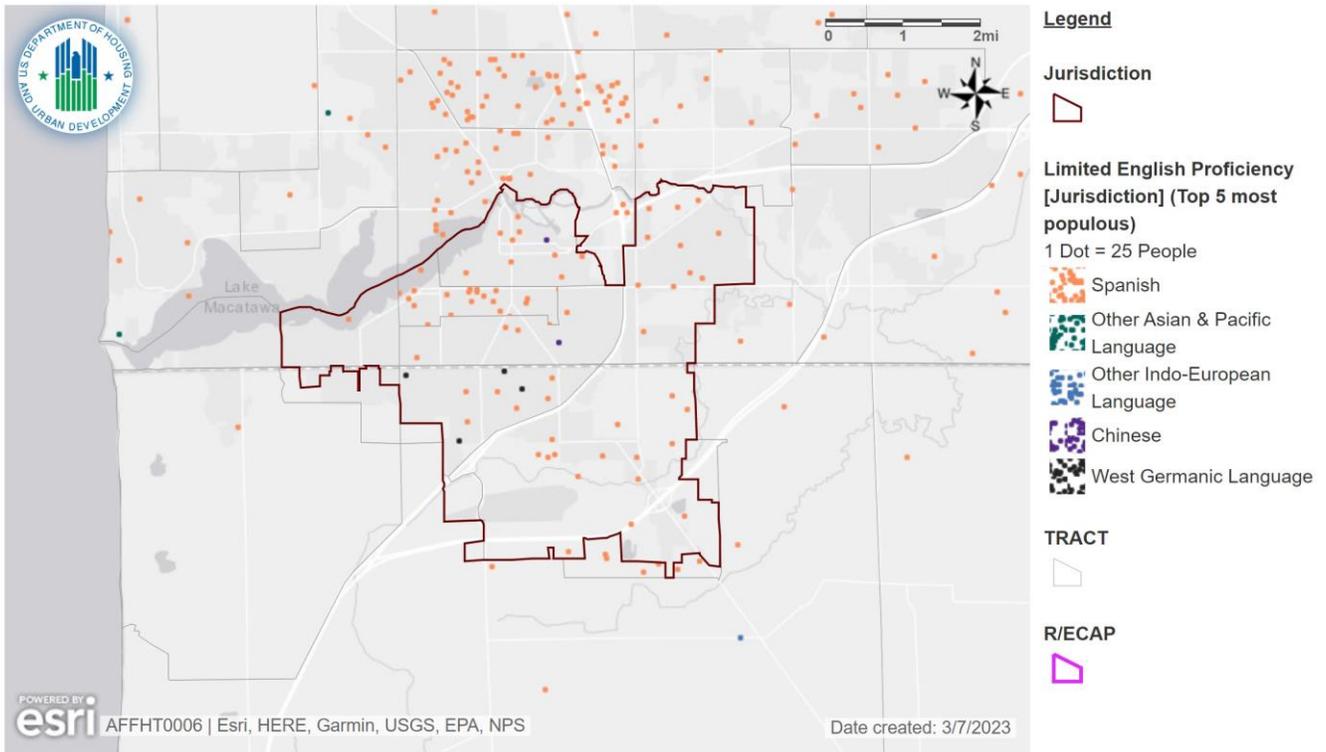
Map 4: Past Race/Ethnicity Density (2010), City of Holland



Map 5: National Origin Density, City of Holland



Map 6: LEP Persons by Top 5 Languages, City of Holland



Disparities in Access to Opportunity

HUD has developed a two-stage process for analyzing disparities in access to community assets. The first stage involves quantifying the degree to which a neighborhood offers features commonly viewed as important community assets such as education, employment, and transportation, among others. This stage uses metrics that rank each neighborhood along a set of key criteria, each of which are determinative of the presence of these community assets. In the second stage, HUD combines these community asset rankings with residential data for each population subgroup to develop a measure of that group's general access or exposure to each community asset. These indexes were calculated for the primary racial/ethnic groups: White, Black, Hispanic, Asian or Pacific Islander, and Native American. It is also important to determine index scores by group across the overall population and for the population below the Federal Poverty Line.

The Federal Poverty Line, also known as the Federal Poverty Threshold, is defined as the level of income required to sustain a “minimum food diet multiplied by three to account for other family expenses.”¹ The United States Department of Health and Human Services issues and manages the Federal Poverty Guidelines, which the U.S. Census Bureau uses in its annual calculation of the Federal Poverty Threshold. As the data presented in Table 11 has been taken from the 2020 Decennial Census, the measure of Federal Poverty, based on household size, is as follows:

Table 8: 2020 Poverty Guidelines for the 48 Contiguous States and the District of Columbia

Persons in Household	Poverty Guideline
1	\$12,760
2	\$17,240
3	\$21,720
4	\$26,200
5	\$30,680
6	\$35,160
7	\$39,640
8	\$44,120

For families/households with more than 8 persons, add \$4,480 for each additional person.

Source: US Census Bureau

Table 9 below summarizes the data, and the sections describe the index scores in more detail. Bar graphs demonstrating each index provide a visual representation of the scores between racial groups for both the overall population and those in poverty. For each metric, maps are also provided, including maps demonstrating other demographic distinctions with index scores by census tracts, to explore other distributions of protected groups across the area. The city of Holland had very close scores between the population groupings, showing minimal disparity or inequality. The scores that showed the most unevenness was the Labor Market Index score, which indicated that the Hispanic, African American, and Native American populations have reduced participation in the labor market compared to White and Asian residents.

¹ <https://www.census.gov/topics/income-poverty/poverty/about/history-of-the-poverty-measure.html>

Table 9: Opportunity Indicators by Race/Ethnicity, City of Holland

	Index						
	Low Poverty	School Proficiency	Jobs Proximity	Labor-Market Engagement	Transit Trips	Low Transportation Cost	Environmental Health
Total Population							
White	45.30	68.42	61.28	42.30	54.07	70.65	81.29
Black	39.06	66.45	57.85	42.44	54.66	75.09	81.08
Hispanic	39.96	69.28	53.26	44.39	55.29	70.76	80.93
Asian or Pacific Islander	36.57	69.47	61.08	39.55	53.00	76.59	81.44
Native American	37.29	68.37	54.59	43.80	54.42	75.64	81.08
Population Below Federal Poverty Line							
White	46.26	68.17	59.62	42.57	55.29	70.96	81.08
Black	43.59	65.56	63.83	41.92	51.61	74.43	82.18
Hispanic	41.24	69.02	50.78	45.00	56.94	72.27	80.44
Asian or Pacific Islander	56.25	72.36	64.04	37.55	56.40	66.65	79.95
Native American	37.13	61.02	53.39	48.35	55.00	79.54	82.00

Source: HUD AFFH version AFFHT0006 released July 2020

Figure 5: City of Holland Opportunity Indicators, Total Population

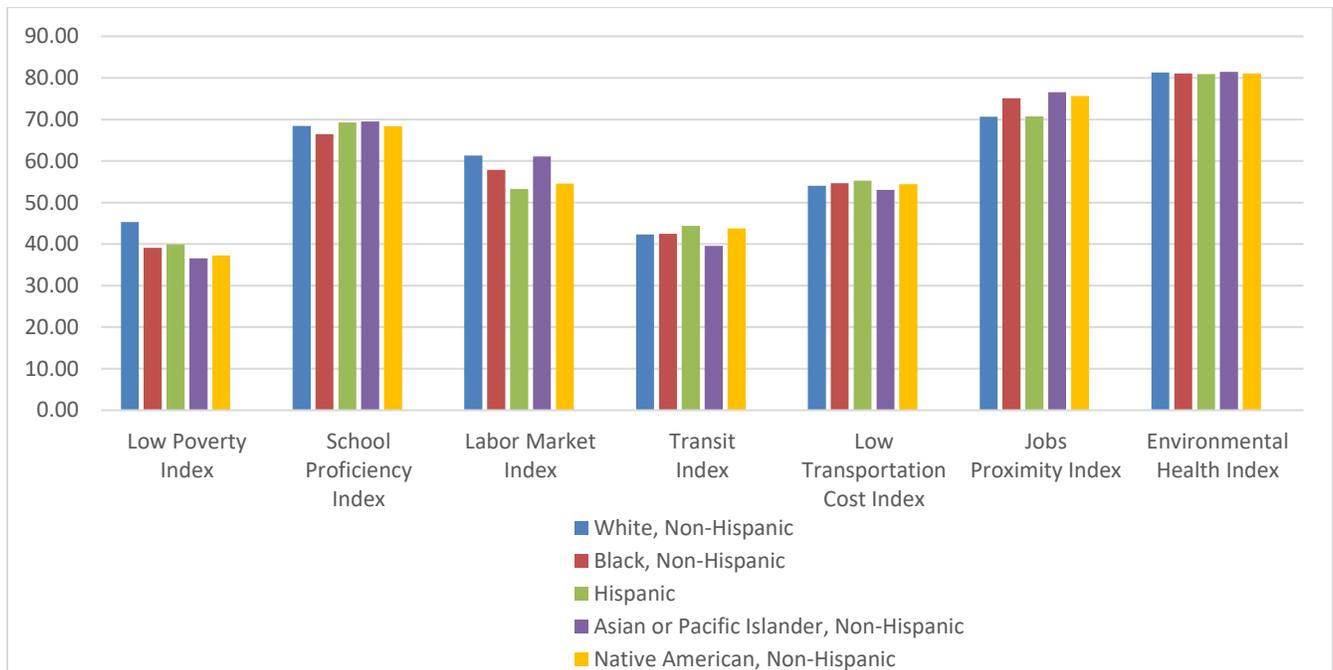
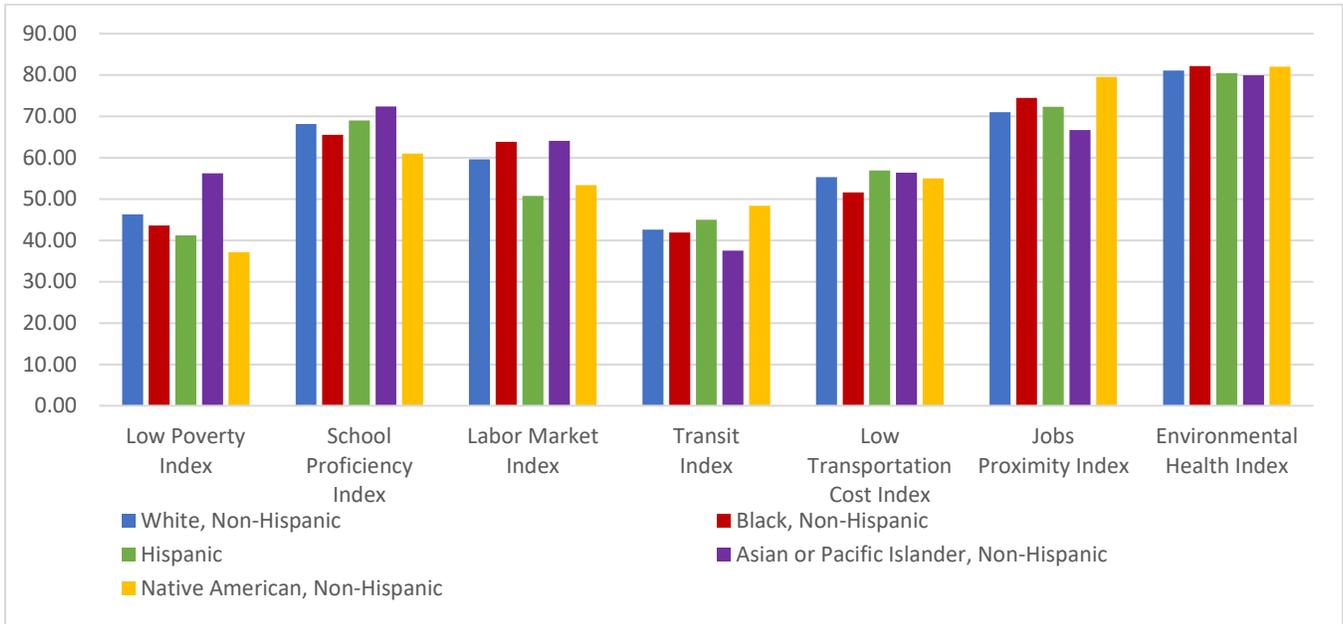


Figure 6: City of Holland Opportunity Indicators, Population below the Poverty Line



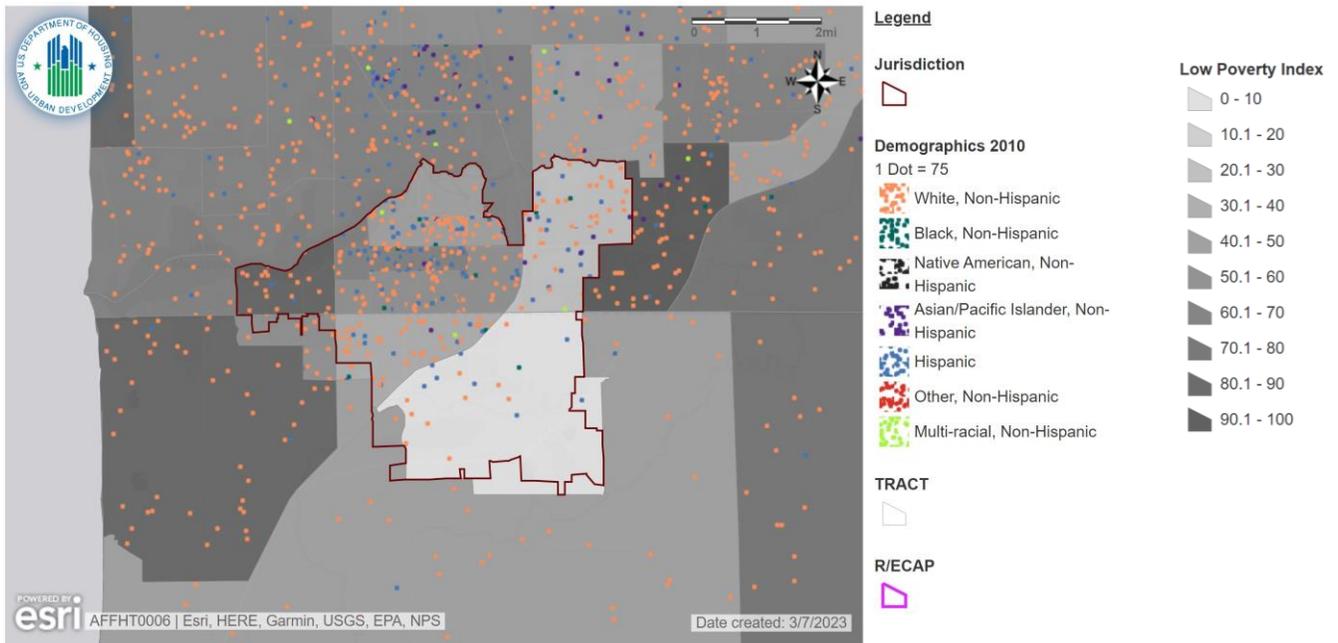
Low Poverty Index

HUD has created a simple poverty index to capture the depth and intensity of poverty in a given neighborhood. The metric for the population below the poverty line can show if those in poverty are living in high-poverty areas, which can make it harder to get out of poverty. The Low Poverty Index is based on the poverty rate for the group and inverted to create an index score ranging from 0 to 100. Lower scores indicate higher poverty levels, and higher scores indicate lower poverty levels.

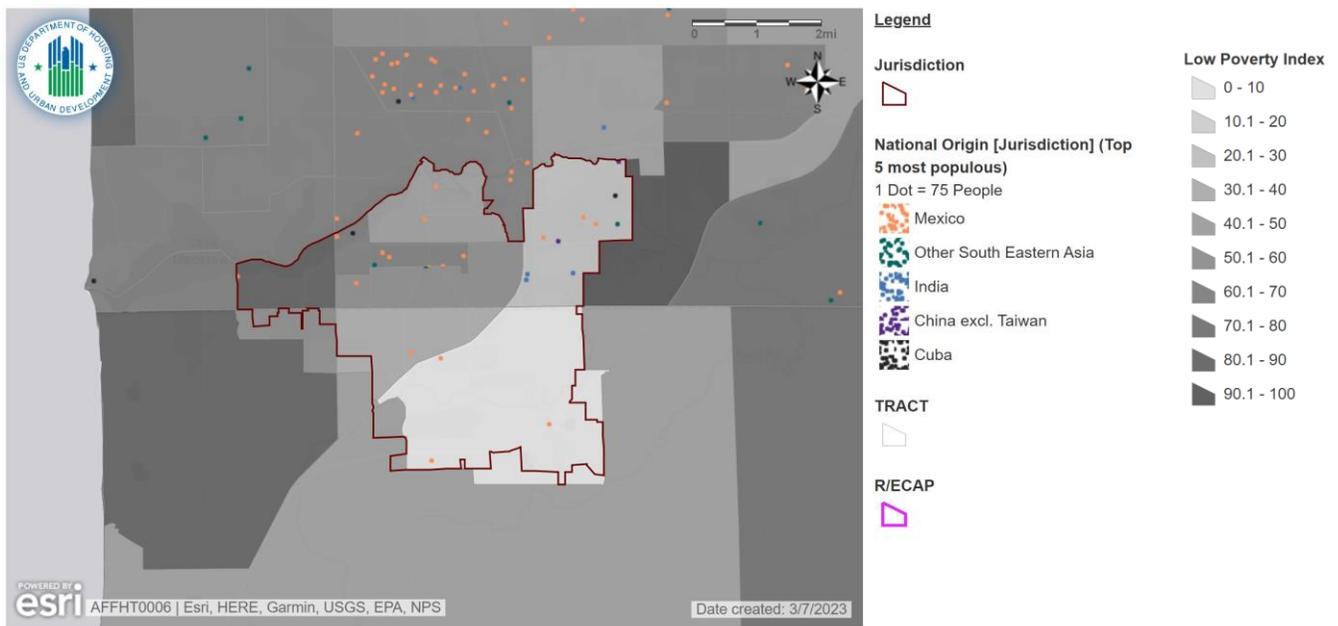
Across the city of Holland, there seems to be a relatively even exposure to poverty, with an eight-point range in scores across all groups in the total population. The White population had the highest score of 45.3—notably, this is 5 points higher than the next-highest score. The remaining groups are relatively close together. The Hispanic group scored 39.96, followed African Americans (39.06), Native Americans (37.29), with the Asian population having the lowest score of 37.29. These lower scores fall within a 3-point range of each other.

Interestingly, the groups living below the poverty line generally have higher scores on the low poverty index than the total population. This is a generally positive development – it indicates that low-income households could be spread evenly among the population— meaning that the overall population is exposed to more poverty than the low-income population is. However, this could also be a result of the small population size resulting in fewer census tracts in the City, so concentrated areas of poverty would not show up at the census tract level. For the population below the poverty line the range was wider—the highest and lowest scores were separated by almost 20 points. The Asian population had the highest score (56.25), indicating lower poverty exposure than their peer groups. Native Americans had the lowest score, 37.13; the next-lowest scoring group was Hispanics with 41.24; then the Black population (43.59), and the second-highest scoring group was the White population with 46.26.

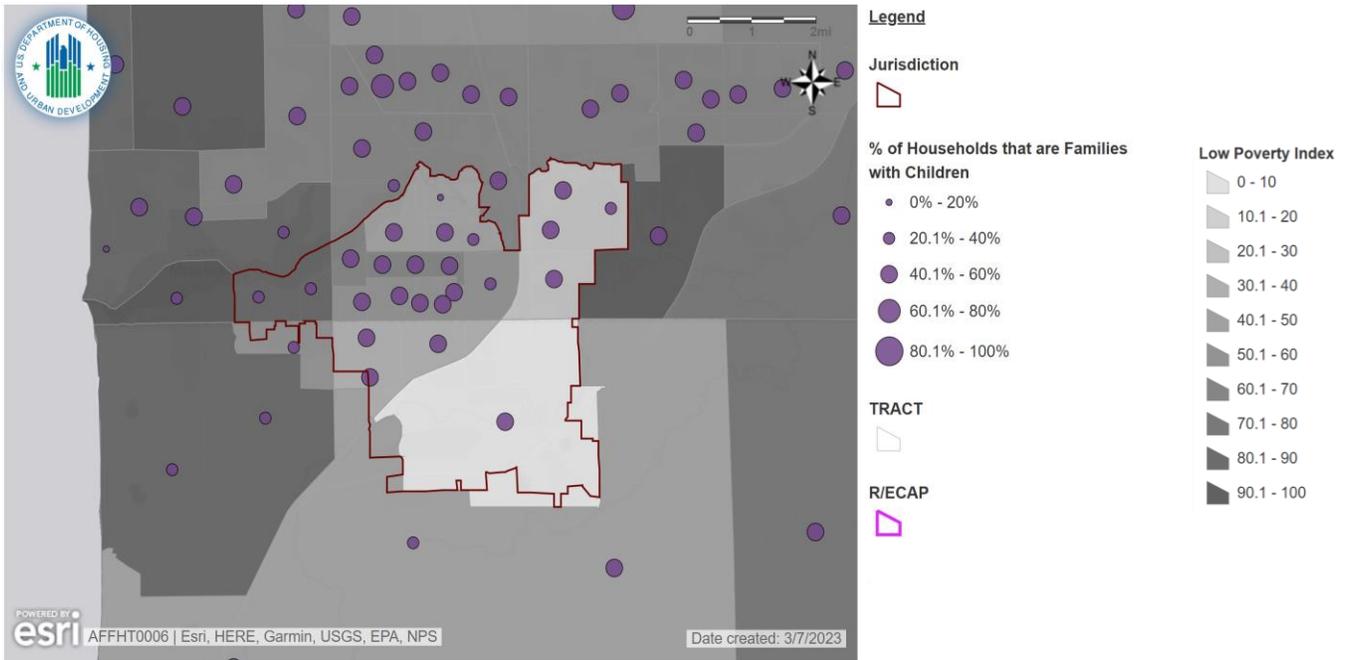
Map 7: Low Poverty Index – Race/Ethnicity, City of Holland



Map 8: Low Poverty Index – National Origin, City of Holland



Map 9: Low Poverty Index – Family Status, City of Holland



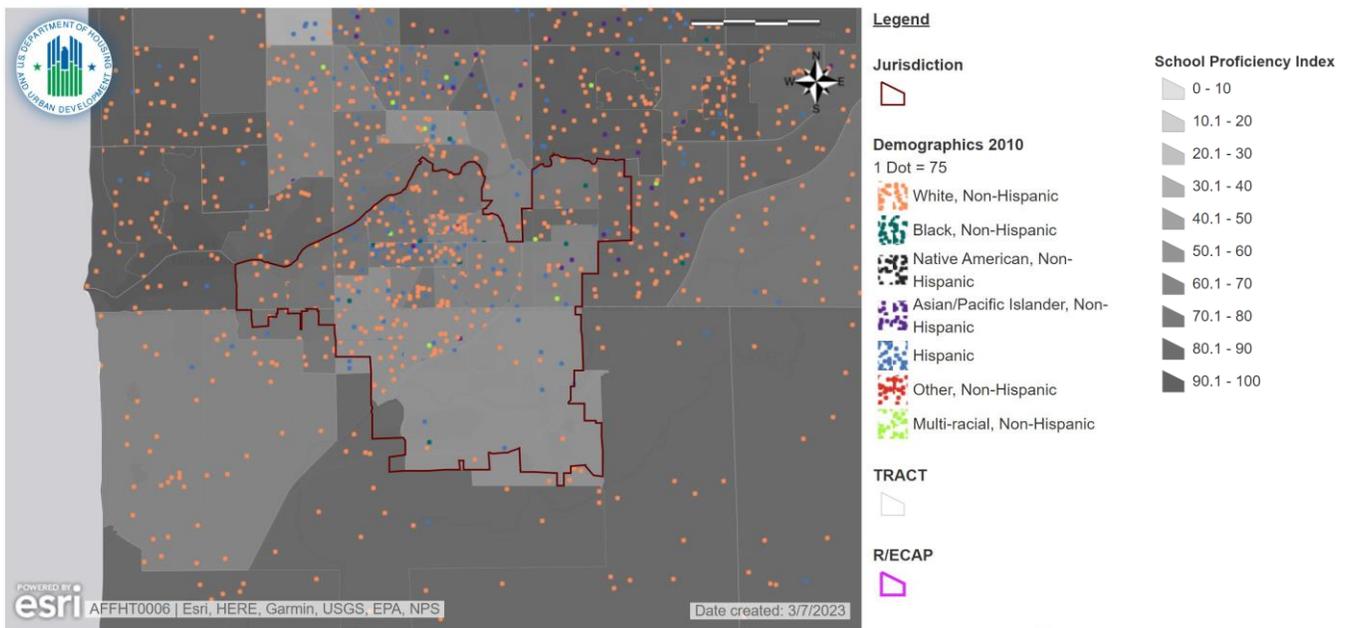
School Proficiency

The School Proficiency Index uses 4th grade performance on state math and reading exams to describe the performance of local elementary schools. A higher score indicates greater access to higher-achieving elementary schools. **HUD data only includes public schools, so the schools analyzed are Holland Public Schools' three neighborhood-based elementary schools, as well as the bilingual elementary school which is available to residents across the City. Notably, charter schools and private schools are NOT included in this analysis.**

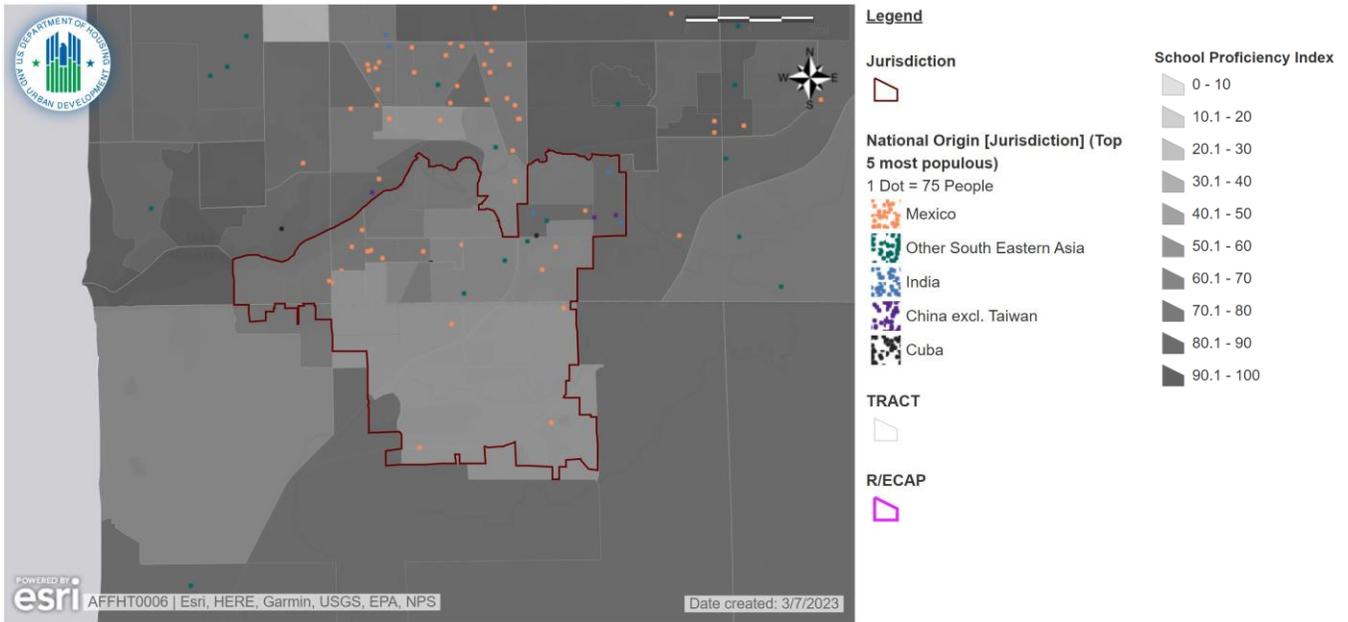
For the four schools analyzed, there is little difference between racial and ethnic groups on the School Proficiency Index. All of the scores across the total population are within about one point of each other, between 68 and 69, as can be seen on the opportunity indicators table. There is some difference for Native Americans (61.02) and African Americans (65.56). The remaining three groups are very close to the total population scores – the Asian population has a higher score for those below the poverty line, with a score of 72.36. The White population scored 68.17 and the Hispanic population scored 69.02.

Additionally, a portion of the City of Holland falls within the Hamilton Public School District. However, most of that land is industrial or West Michigan Regional Airport, and the proportion of Holland residents in the Hamilton School District is small. **Hamilton Public Schools are not included in this analysis.**

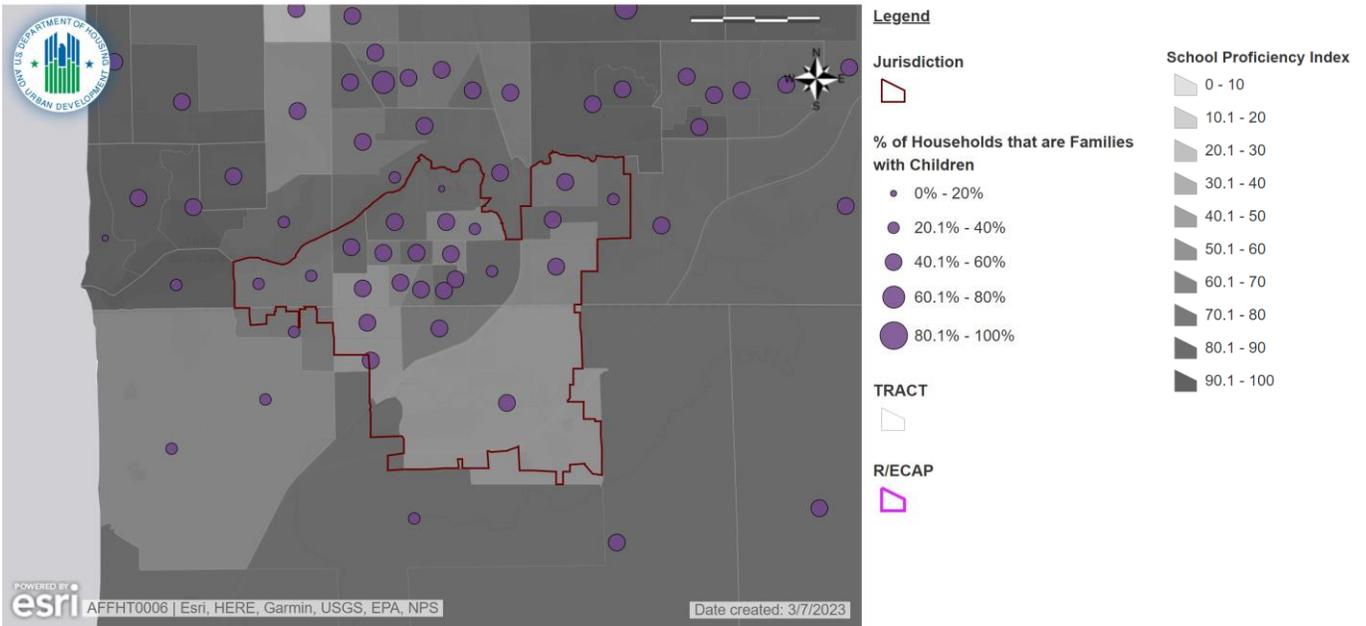
Map 10: Schools Proficiency Index – Race/Ethnicity, City of Holland



Map 11: Schools Proficiency Index – National Origin, City of Holland



Map 12: Schools Proficiency Index – Family Status, City of Holland



Job Proximity & Labor Market Engagement

The Jobs Proximity Index quantifies the accessibility of a given residential neighborhood (Census Block Group) as a function of its distance to all job locations within a Census Core-Based Statistical Area (CBSA), with larger employment centers weighted more heavily. Interpretation Values are percentile ranked with values ranging from 0 to 100. The higher the index value, the better the access to nearby employment opportunities for residents in a neighborhood. Map 17 shows Jobs Proximity Index scores by Census Tract in shades of gray, with a dot density map to demonstrate the distribution of racial groups.

A similar, though more nuanced measure of employment by neighborhood can be found in the Labor Market Engagement Index, which provides a summary description of the relative intensity of labor market engagement and human capital in a census block group. The Index is percentile ranked nationally in a range of 0 to 100 based upon the level of employment, labor force participation, and educational attainment in a given neighborhood. Map 18 shows Labor Market Engagement Index scores by Census Tract in shades of gray, with a dot density map to demonstrate the distribution of racial groups.

Job Proximity Index

There is a close six-point range across the total population on the Jobs Proximity Index. The top three scores are close together—Asians scored highest with 76.64, trailed closely by Native Americans (75.64), and African Americans (75.09). The two lowest scoring groups are Hispanic residents (70.76) and White residents (70.65). These scores are very high for all groups, so there is good access to job opportunities across the board.

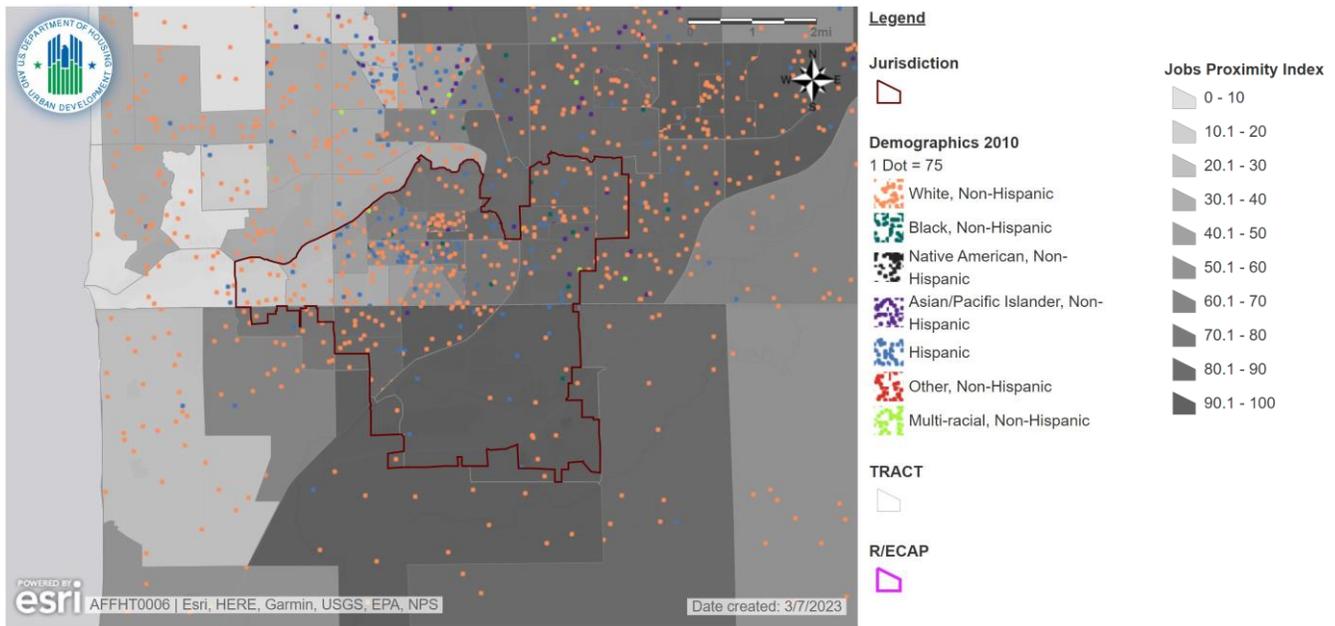
Oftentimes, those in poverty choose to live closer to job opportunities due to the expense of a long commute. If this is not possible, it will become harder for them to come out of poverty. This is somewhat reflected in the Job Proximity Index scores for the population below the poverty line. There is also a larger range for the high-poverty group, the lowest and highest scores are 13 points apart. Native Americans have the highest score (79.54), and the next-highest group is 5 points lower. The Black population below the poverty line has a score of 74.43, followed by the Hispanic population (72.27), and the White population (70.96). The Asian population has the lowest score, four points lower, with 66.65.

Labor Market Index

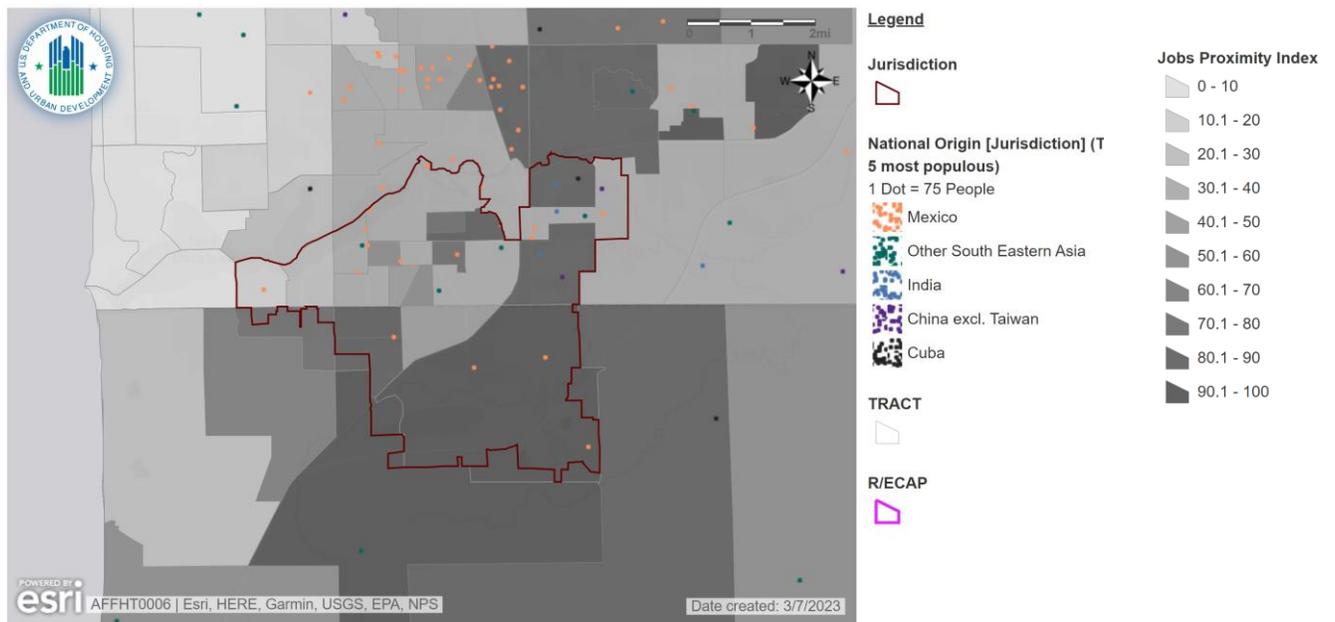
The scores on the Labor Market Index for the total population also fall within a six-point range of one another. The highest scoring group is the White population (61.28), followed closely by the Asian population with 61.08. Taking a step down, African Americans scored in the middle (57.85), followed by Native Americans (54.59), and Hispanics had the lowest Labor Market Index score of 53.26. All of these scores are within a 9-point range, but they do show some difference in labor market participation among minority groups, especially Hispanics and Native Americans.

For the Population below the poverty line, some groups scored higher on the Labor Market Index than for the population as a whole. This may show that those living in poverty in these groups are actively working and participating in the labor market at a higher rate than the overall population. The low-income groups that scored higher than the overall population were African Americans (63.83) and Asians (64.04). These were also the highest two scores for this section. The score for Native Americans living below the poverty line (53.39) was only slightly lower than for the overall population of that group. The White population under the poverty line had a slightly lower score of 59.62, about 1.5 points below the overall White population. Finally, Hispanics below the poverty line had the lowest score across all groups, scoring 50.78 on the Labor Market Index. Overall, the population below the poverty line had more range than the overall population, spanning about 14 points.

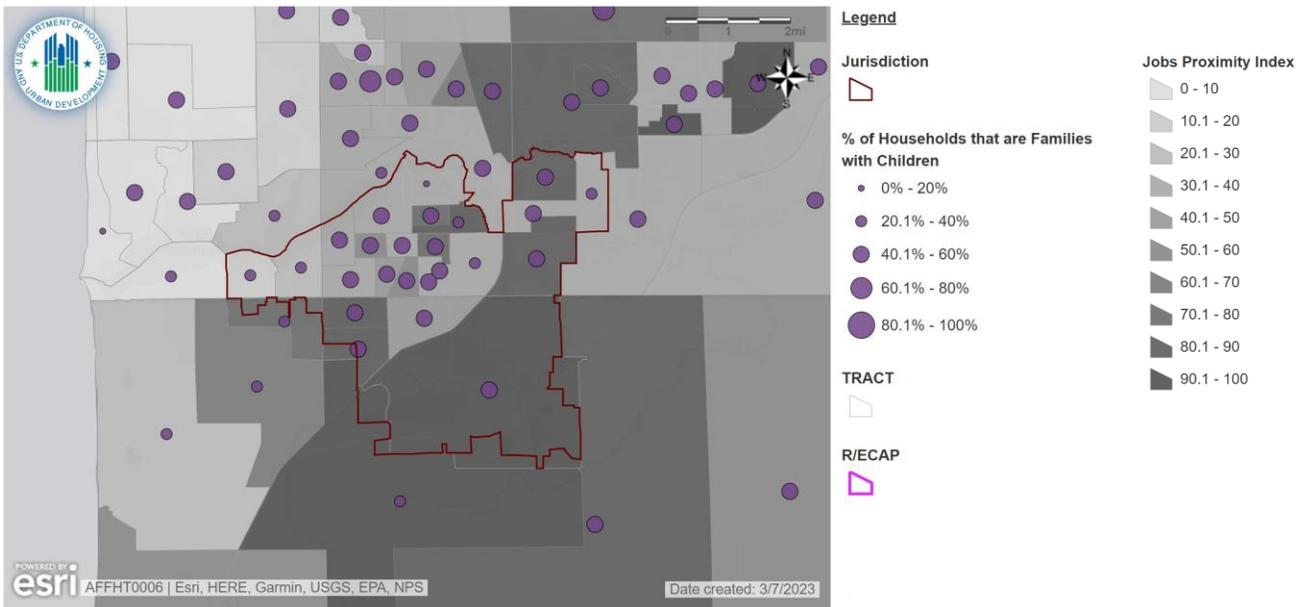
Map 13: Jobs Proximity Index – Race/Ethnicity, City of Holland



Map 14: Jobs Proximity Index – National Origin, City of Holland



Map 15: Jobs Proximity Index – Family Status, City of Holland



Low Transportation Cost

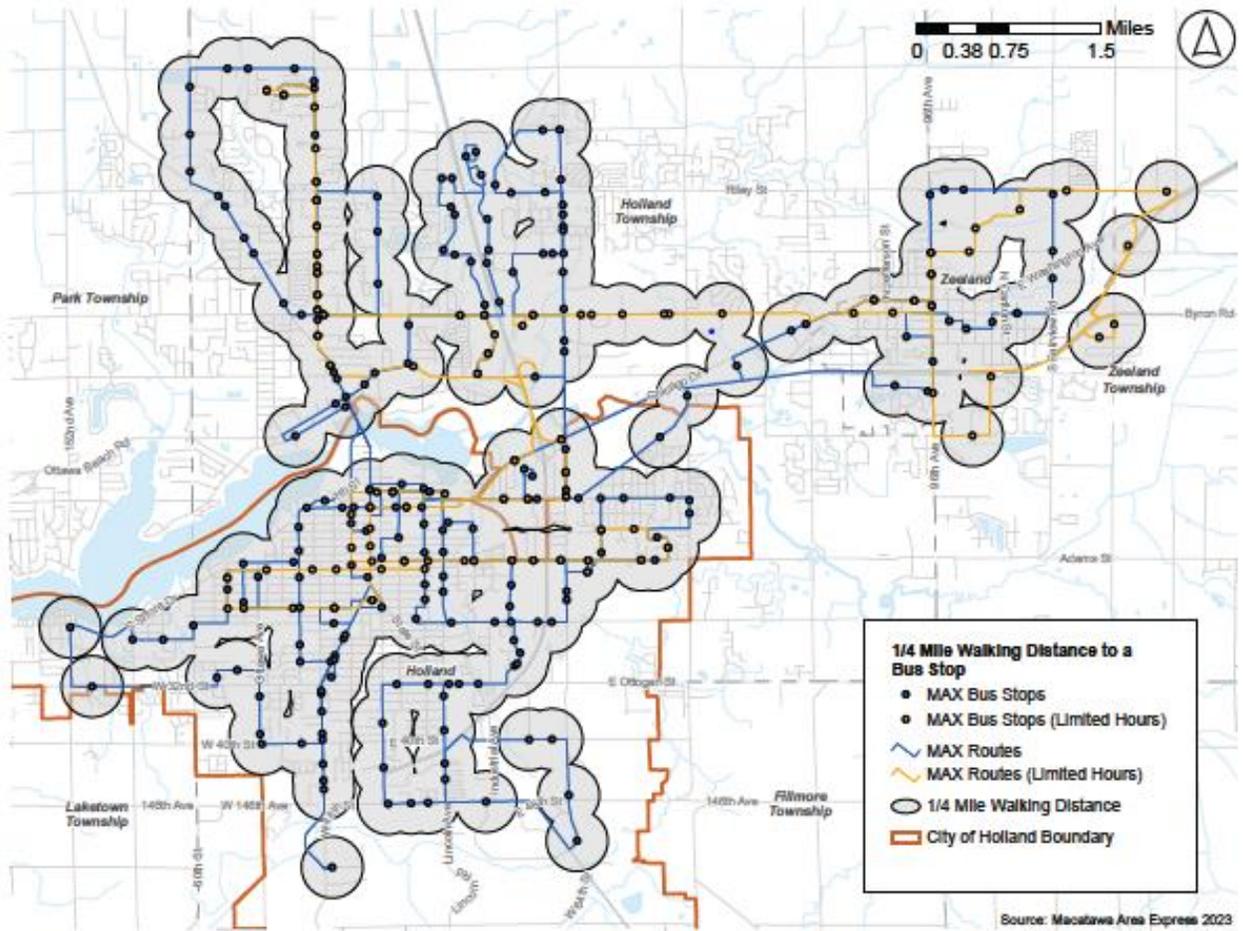
The Low Transportation Cost Index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters in Ottawa County. The index is percentile ranked nationally, with values ranging from 0 to 100. Low Transportation Cost Index provides insight into trip length as well as access to alternative forms of transportation, and overall spending on transportation. A lower Low Transportation Cost Index score indicates higher spending on transportation and longer trip lengths.

Across the overall population and across the population below the poverty line scores are relatively even throughout. For the overall population, the highest and lowest scores are separated by about two points. The highest scoring group in the overall population is the Hispanic group (55.29), which follows with their high job proximity score. The lowest scoring group in the overall population is the Asian population, with a score of 53.00. All other groups fall within that range and can be found on the Opportunity Index Table.

For those below the poverty line, almost every group scored slightly higher than the overall population, following the logic of the job proximity index scores. The only group below the poverty line that scored lower than the overall population was the Black population, which scored 51.61, 3 points lower than the score of the overall population.

For context, the map below shows bus stops for the Macatawa Area Express (MAX), the transit system serving greater Holland, along with a quarter mile radius around each stop. While MAX buses are readily available to much of the City of Holland and its neighbors, routing and frequency could be improved to better serve the community. In particular, because of the “downtown hub and spoke” routing model, the system lacks efficient “crosstown” routes, especially running east-west.

Map 16: ¼ Mile Walking Distance to a Bus Stop (MAX Bus System Access from Master Plan 2023)

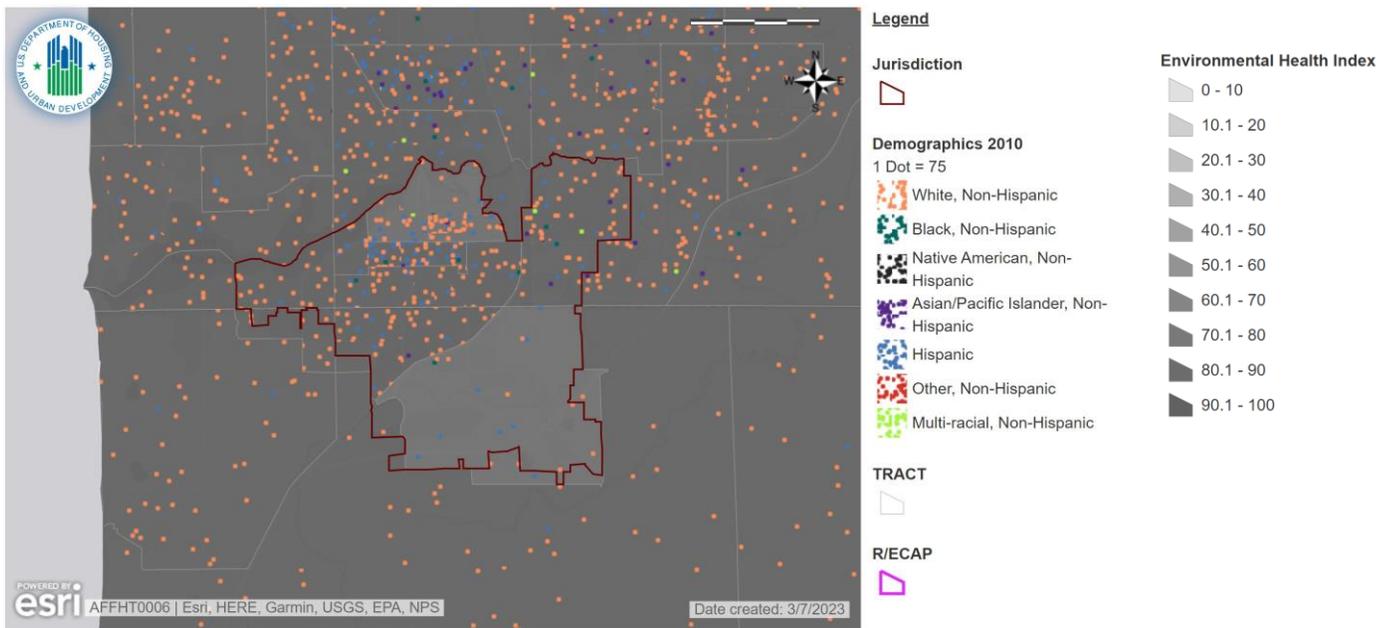


Environmental Health Index

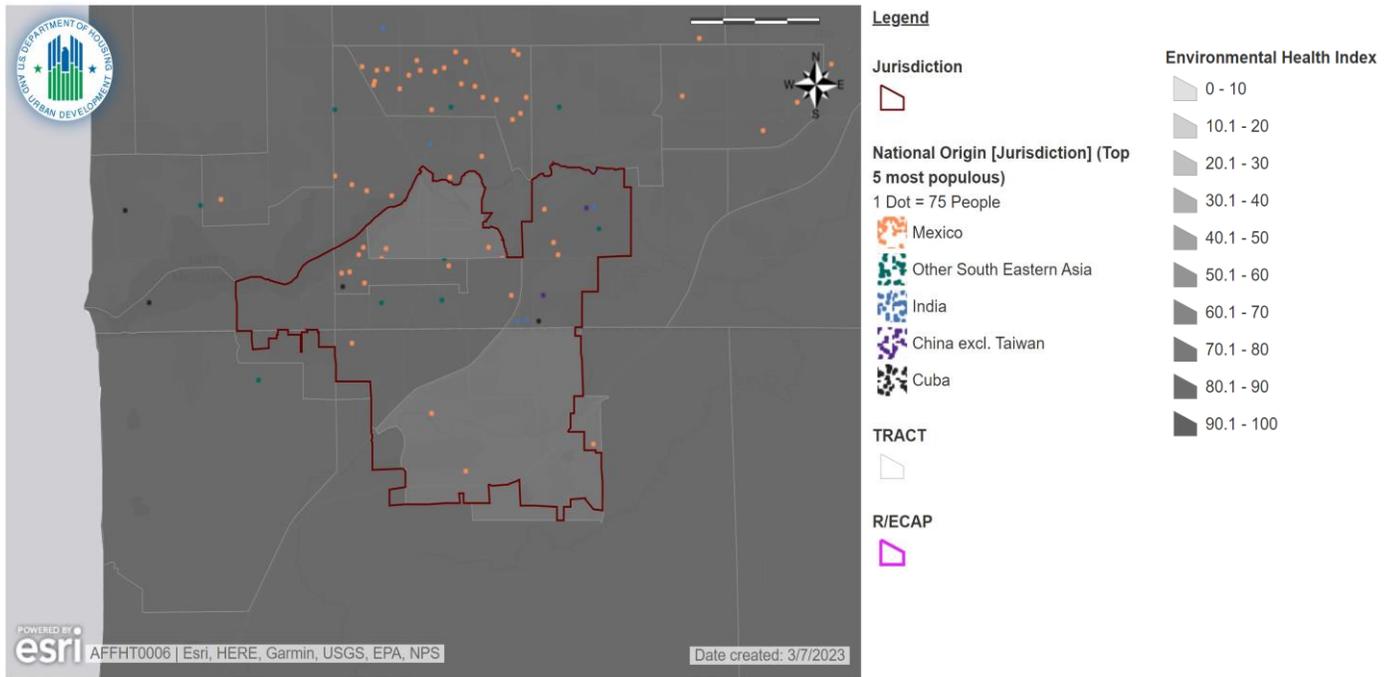
The Environmental Health Index describes potential exposure to harmful toxins at the census tract level. It uses EPA estimates of air quality carcinogenic, respiratory, and neurological hazards. A lower score indicates higher exposure to harmful toxins.

All scores in the City of Holland scored very highly on the Environmental Health Index, and with minimal differences between groups. All scores across both the overall and poverty-stricken groups were within about two points of each other, between 79.95 and 82. Asians below the poverty line had the lowest score (79.95). All other scores can be found on the Opportunity Index Table.

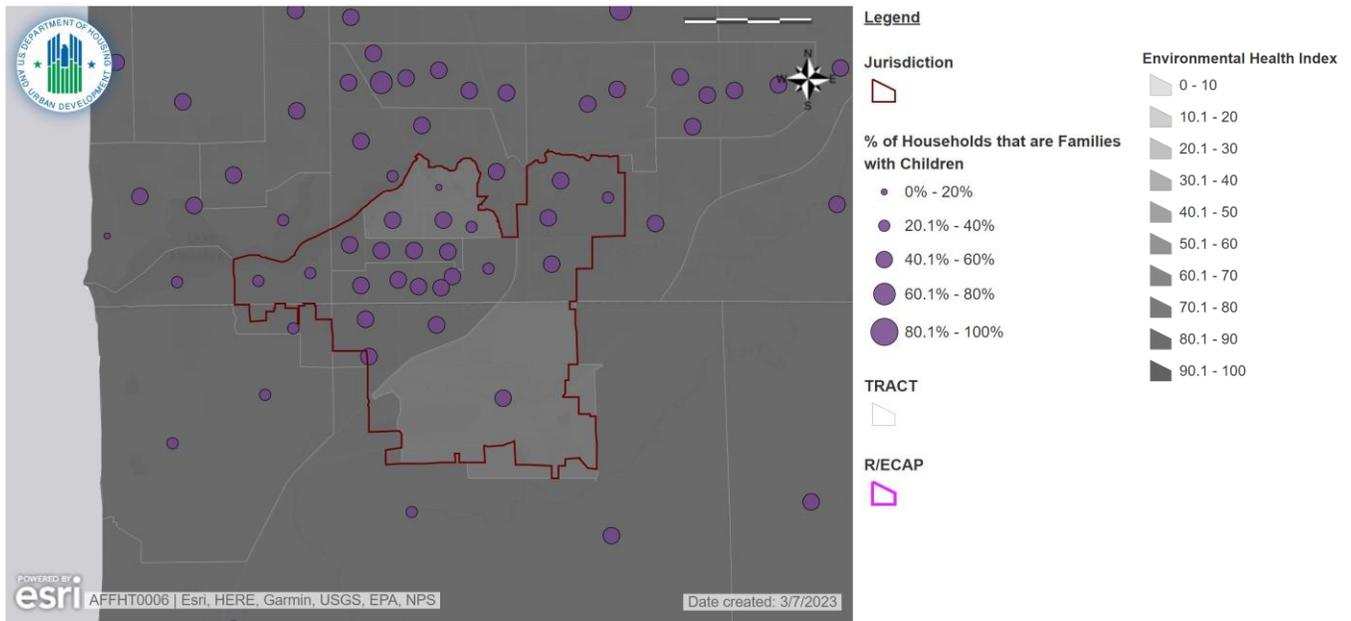
Map 17: Race/Ethnicity – Environmental Health Index, City of Holland



Map 18: National Origin – Environmental Health Index, City of Holland



Map 19: Family Status – Environmental Health Index, City of Holland



Disproportionate Housing Needs

HUD designates a list of four “Housing Problems”. Households that experience at least one of these four problems are considered to have Disproportionate Housing Needs. To understand disparities between racial and ethnic groups this document compares the number of households with disproportionate housing needs by head of household race/ethnicity. The Housing Problems are:

- Incomplete kitchen facilities
- Incomplete plumbing facilities.
- More than 1 person per room.
- Monthly housing costs, including utilities, exceeds 30% of income.

HUD also designates a list of four “Severe Housing Problems” – they are as follows. Households that experience at least one of these four problems are considered to have Severely Disproportionate Housing Needs.

- Incomplete kitchen facilities
- Incomplete plumbing facilities
- More than 1.5 persons per room
- Monthly housing costs, including utilities, exceeds 50% of income.

Statistically, Native Americans are the most likely racial group to experience housing problems. While the Native American population of Holland is small (comprised of approximately 30 households) relative to other racial and ethnic groups, every Native American household included in the data experienced some sort of housing problem. Households identifying as “some other race” are the second mostly likely racial group to experience housing problems, at just over 52%. Households identifying as White are actually the third mostly likely, at just over 30%, with Asian (22%) and Black (18%) household less likely to experience housing problems.

Nearly 48% of households identifying as Hispanic, regardless of race, experience housing problems.

Table 10: Households Experiencing One or More Housing Problems by Race/Ethnicity and Family Size, City of Holland

One or More Housing Problems	Number	Percent (%)
White, Non-Hispanic	2,655	30.30%
Black, Non-Hispanic	49	17.95%
Hispanic	984	47.70%
Asian or Pacific Islander, Non-Hispanic	64	21.77%
Native American, Non-Hispanic	30	100.00%
Other, Non-Hispanic	70	52.24%
Total	3,855	33.32%
Family Type		
Family Households, <5 people	1,265	21.14%
Family Households, >5 people	674	45.42%
Non-Family Households	1,905	46.59%

Source: HUD AFFH version AFFHT0006 released July 2020
All percentages indicate the share of the total number of households in City of Holland.

Cost Burden

HUD considers a household to be burdened by the cost of housing if housing costs equal 30% or more of the household’s monthly income. Non-white households are more likely to experience cost burdens than white households, with households identifying as black being the most likely racial group to be cost burdened, at just over 56%. Households identifying as “some other race” are the second mostly likely racial group to experience cost burden, at just over 41%. The other non-white racial groups are closer to the White rate of 32%, though slightly above it.

Nearly 42% of households identifying as Hispanic, regardless of race, are cost burdened by their housing.

Table 11: Households Experience Severe Housing Cost Burden by Race/Ethnicity, City of Holland

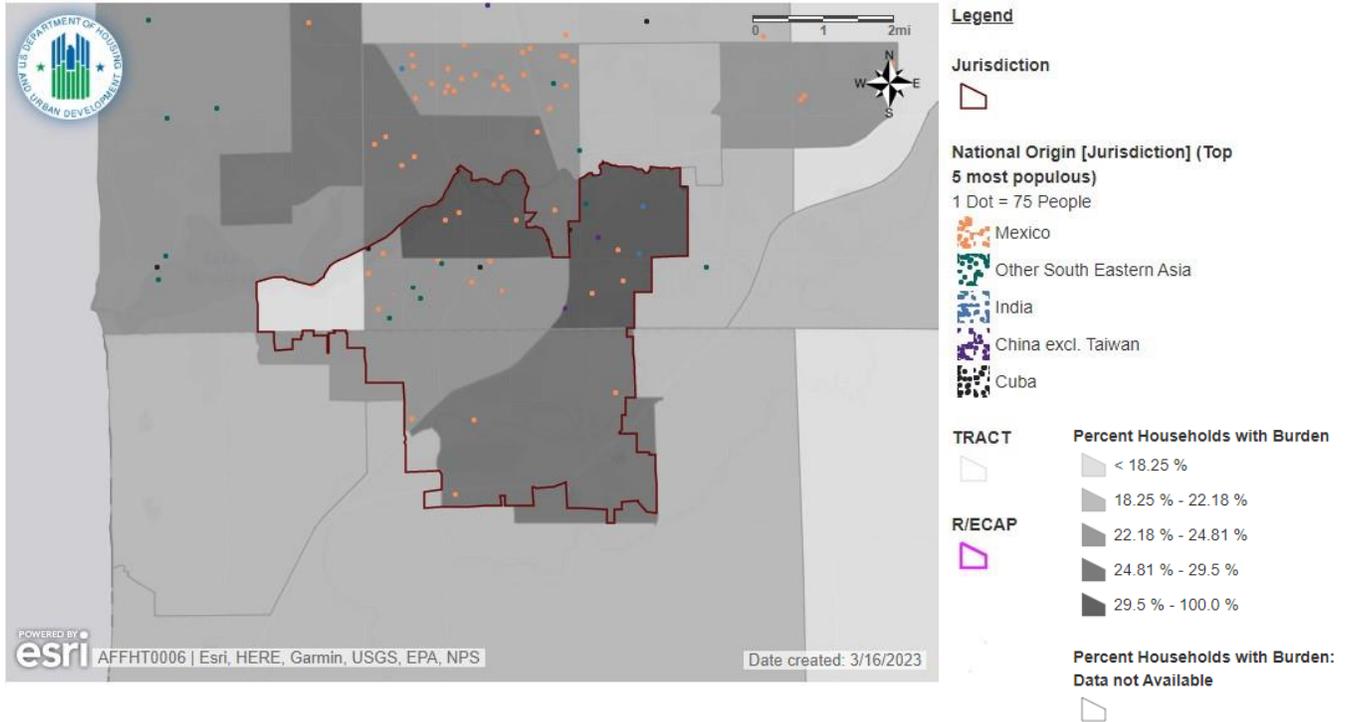
Severe Housing Burdens	Number	Percent (%)
White	10,269	32.33%
Black	943	56.20%
Hispanic	611	41.73%
Asian or Pacific Islander	1,471	36.57%
Native American	57	33.33%
Other	280	41.07%

Source: HUD AFFH version AFFHT0006 released July 2020
 All percentages indicate the share of the total number of households in City of Holland.

Map 20: Households Experiencing One or More Housing Burdens with Race/Ethnicity Density, City of Holland



Map 21: Households Experiencing One or More Housing Burdens with National Origin Density, City of Holland



Differences in rates of renter and owner-occupied housing by race/ethnicity.

In the City of Holland, non-White households are disproportionately more likely to rent than White households. Over 80% of homeowners are Non-Hispanic Whites, despite that racial group making up just 69% of the population. Households identifying as black make up just 1.3% of homeowners, compared to 3.2% of the population. Households identifying as Hispanic, regardless of race, make up just over 14% homeowners, but over 22% of the population.

Table 12: Homeownership and Rental Rates by Race/Ethnicity, City of Holland

Race/Ethnicity	Homeowners		Renters	
	Number	Percent (%)	Number	Percent (%)
White, Non-Hispanic	5,585	80.36%	3,190	69.05%
Black, Non-Hispanic	90	1.29%	170	3.68%
Hispanic	1,005	14.46%	1,065	23.05%
Asian or Pacific Islander, Non-Hispanic	150	2.16%	150	3.25%
Native American, Non-Hispanic	15	0.22%	15	0.32%
Other, Non-Hispanic	105	1.51%	35	0.76%
Total Household Units	6,950	–	4,620	–

Source: HUD AFFH version AFFHT0006 released July 2020

Publicly Supported Housing Analysis

Table 13: Total Units of Publicly Supported Housing, City of Holland

Housing Units	Number	Percent (%)
Total Housing Units	13,279	-
Public Housing	0	-
Project-based Section 8	375	2.82%
Other Multifamily (LIHTC)	305	2.29%
HCV Program	262	1.97%

Source: HUD AFFH version AFFHT0006 released July 2020

Availability of Publicly Supported Housing

The 2021 American Community Survey reports that 908 households in City of Holland had incomes less than \$14,999 in 2020, and 1,117 had incomes between \$15,000 and \$24,999. The city’s 942 publicly-supported housing units are insufficient—serving less than half of the households below 30% of AMI.

Likelihood of Racial/Ethnic Groups to Live in One Category of Publicly Supported Housing

Public Housing: Public housing is housing that is owned and managed by a Public Housing Authority (PHA). There are no public housing units in the City of Holland.

Project Based Section 8: Of the total number of households in the City of Holland, 0.4% of non-Hispanic White households, 8.2% of non-Hispanic Black households, and 3.2% of Hispanic households (regardless of race) live in housing units supported by Project Based Section 8. No households identifying as Asian live in housing units supported by Project Based Section 8, according to HUD AFFH data.

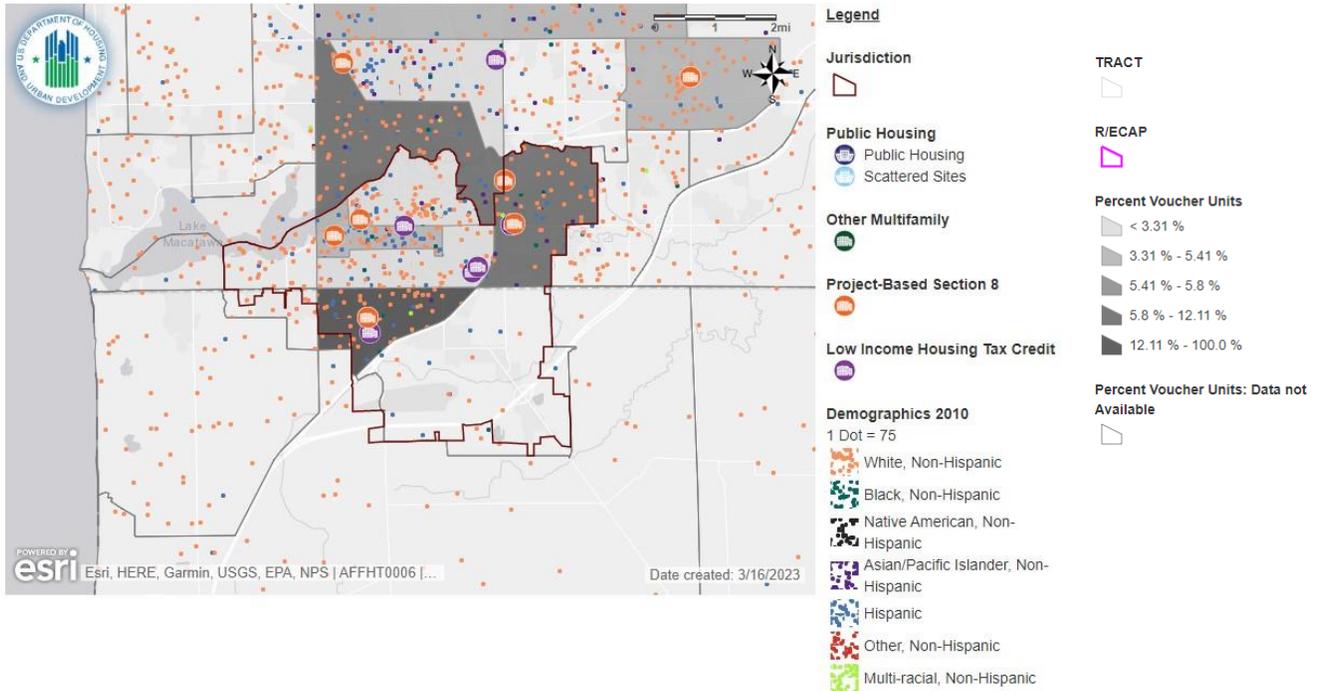
Housing Choice Vouchers: Data is not available for the racial identity of Housing Choice Voucher program participants.

Demographics of Publicly Supported Housing Compared to Overall City

The representation of racial/ethnic groups in publicly supported housing is not proportional to the proportions in City of Holland as a whole. Black Non-Hispanic residents are over 20 times more likely to live in Publicly Supported Housing than White Non-Hispanic Residents, and over twice as likely to live in Publicly Supported Housing than Hispanic residents. However, because White Non-Hispanic residents are the largest racial group in the city, over 70% of residents in publicly supported housing are White Non-Hispanic.

While publicly supported housing is clustered in the City's core neighborhoods and along the US-31 corridor, it is well-located in proximity to Holland's major job centers (its downtown and its industrial area in the southern part of the City near West Michigan Regional Airport). While publicly supported housing is conveniently located, the absence of higher density residential zoning districts on the west side will likely prevent any publicly supported projects from being built there.

Map 22: Public Housing, Project-Based Section 8, Other Multi-Family, and LIHTC Locations Mapped with Race/Ethnicity Density, City of Holland



Map 23: Voucher Density with Race/Ethnicity Density Map, City of Holland

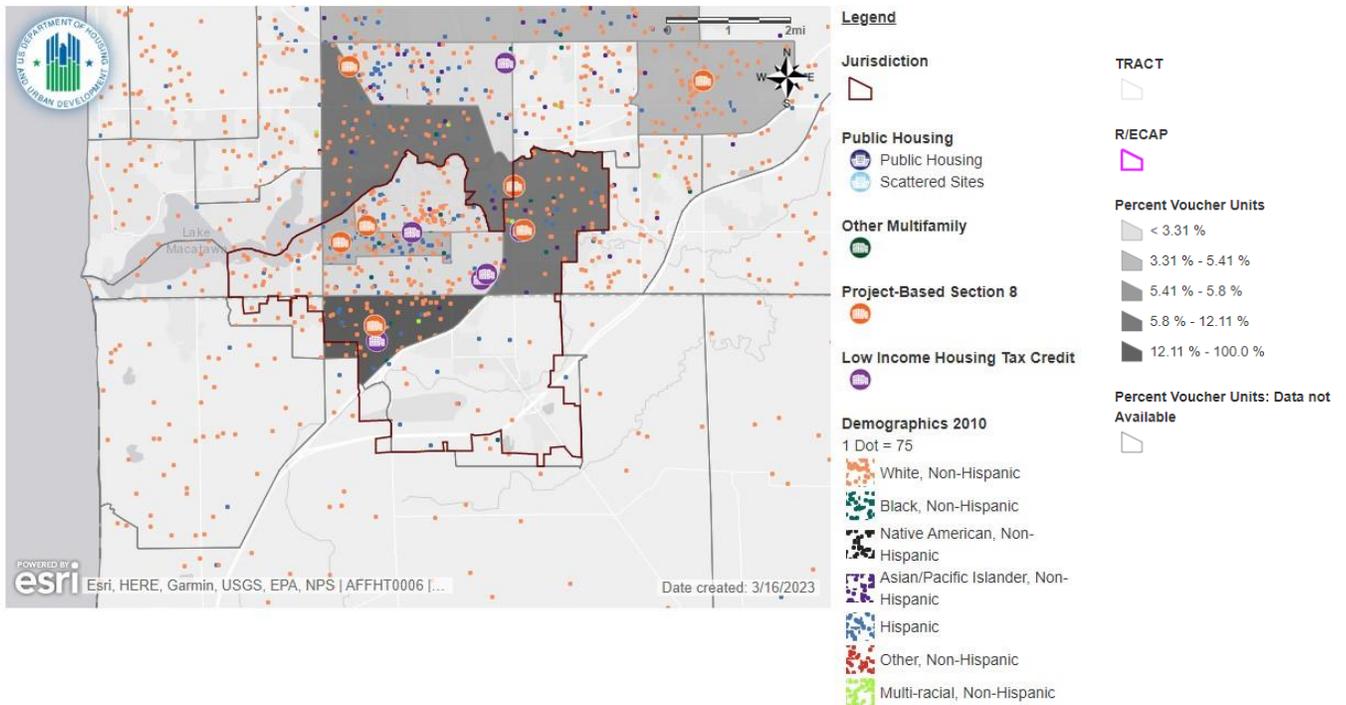


Table 14: Number of Bedrooms for Units for Publicly Supported Housing, City of Holland

Housing Units	0-1 Bedroom Units		2 Bedroom Units		3+ Bedroom Units		Households with Children	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Project-Based Section 8 (by # of units)	200	54.50%	124	33.79%	36	9.81%	105	28.61%
HCV Program (by # of households)	56	22.48%	115	46.39%	77	31.13%	137	55.07%

Source: HUD AFFH version AFFHT0006 released July 2020

Balance of Unit Types

While more than half of Project-Based Section 8 housing units are one unit or less, more than a third are two-bedroom units. Households with children are likely to need at least two bedrooms, often more. Only 9.81% of Project-Based Section 8 units contain more than three bedrooms, while 28.61% of Project-Based Section 8 households have children. More than half of all HCV households have children (55.07%) and over 80% of HCV units have at least two bedrooms. There is more variety among HCV units, such is the nature of the program. Housing Choice Vouchers provide households with the opportunity to obtain market-priced housing at a reduced cost, thus allowing them to find units that fit their needs.

Disability and Accessibility

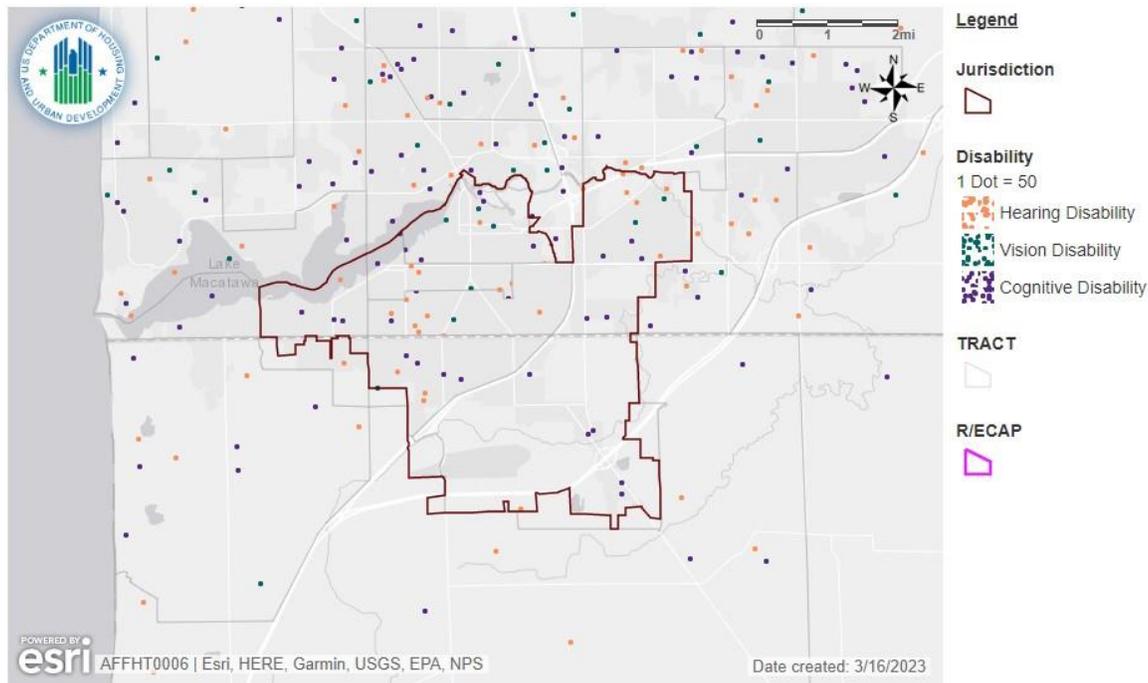
Table 15: Persons with Vision, Hearing, Cognitive, Ambulatory, Self-Care, and Independent Living Difficulties, City of Holland

Disability Type	Number	Percent (%)
Hearing Difficulty	1,204	3.95%
Vision Difficulty	447	1.47%
Cognitive Difficulty	1,759	5.78%
Ambulatory Difficulty	1,704	5.60%
Self-Care Difficulty	768	2.52%
Independent Living Difficulty	1,550	5.09%

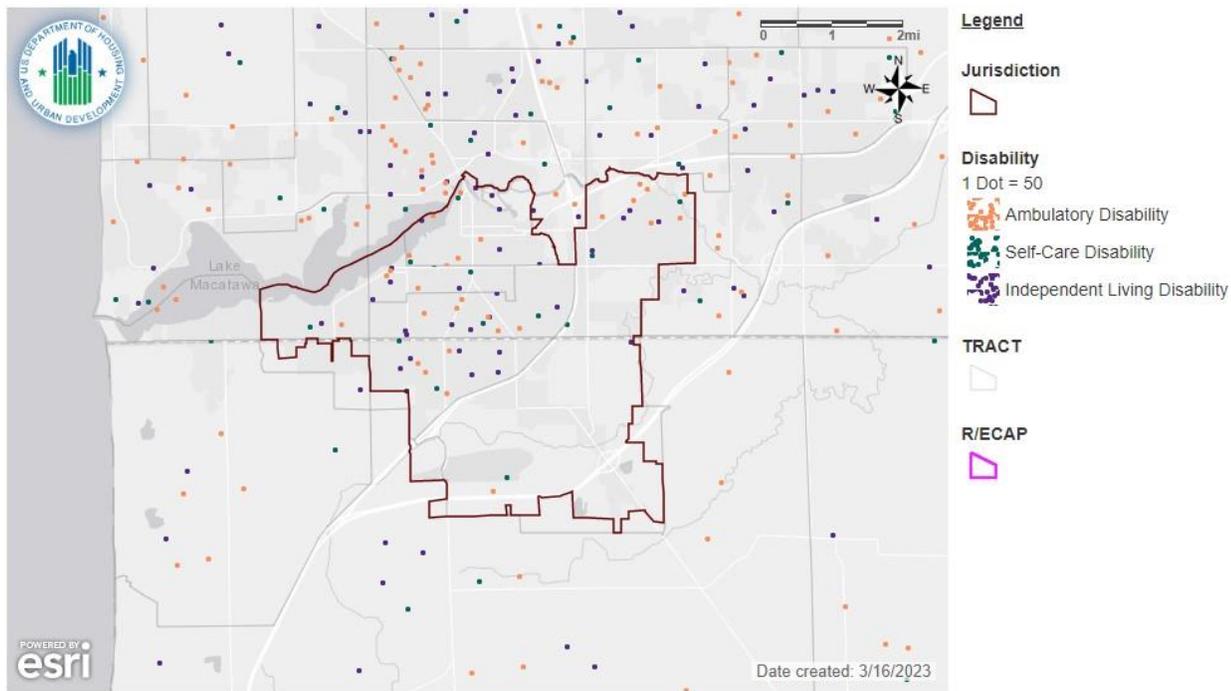
Source: HUD AFFH version AFFHT0006 released July 2020

The most prevalent single disability in the City is Cognitive difficulty (5.78%), followed closely by Ambulatory (walking) difficulties (5.6%). Table 18 breaks down the number of individuals experiencing each type of disability in Holland. Notably, this does not identify the number of individuals with disabilities, but the total number of types of difficulties faced by people with disabilities. This is because many people with disabilities might have multiple difficulties that require vastly different accommodations. It is more useful to know the types of difficulties that are most common rather than a generalized number of people with any disability.

Map 24: Population Density of Persons with Disabilities – Persons with Hearing, Vision, and Cognitive Disability, City of Holland



Map 25: Population Density of Persons with Disabilities – Ambulatory, Self-Care, and Independent Living Disability, City of Holland



Geographic Distribution of Persons with Disabilities.

The majority of persons with disabilities are distributed evenly with the overall population. The more populous census tracts have more people with disabilities living there. Cognitive difficulties are more prevalent in the Southern portion of the City than other types of disabilities.

Table 16: Persons with Disabilities by Age Range, City of Holland

Age of People with Disabilities	Number	Percent (%)
Age 5-17 with Disabilities	375	1.23%
Age 18-64 with Disabilities	1,985	6.52%
Age 65+ with Disabilities	1,600	5.25%

Source: HUD AFFH version AFFHT0006 released July 2020

Age of Persons with Disabilities

In the City of Holland, those ages 18 to 64 have the highest proportion of individuals with disabilities of the three age groups, with 6.52% of this group having a disability. Of those ages 65 and up, 5.25% have a disability. Finally, a small proportion of children between 5 and 17 years old have a disability, at 1.23% of the group.

Map 26: All Persons with Disabilities by Age Range, City of Holland

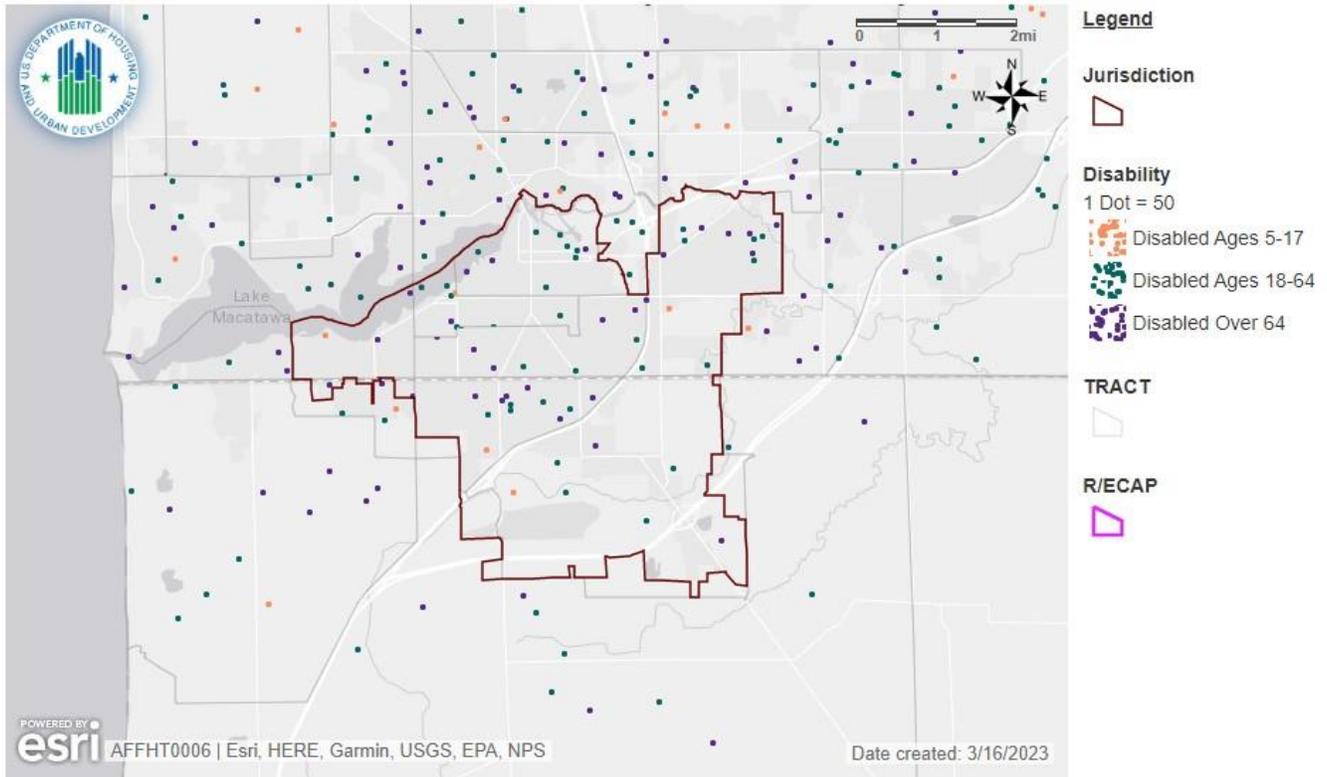


Table 17: Disability by Publicly Supported Housing Program Category, City of Holland

Housing Program	Households including a member with a Disability	
	Number	Percent (%)
Project-Based Section 8	67	18.25%
HCV Program	47	18.73%

Source: HUD AFFH version AFFHT0006 released July 2020

* Data for all individuals was not available. Data for available races/ethnicities (i.e. Whites, Blacks, Asians, and Hispanics) has been totaled and included instead.

04.

Fair Housing Testing & Enforcement Data

The Fair Housing Center of West Michigan (FHCWM) is a regional provider of fair housing education, outreach, and enforcement services. FHCWM provides services under contract with HUD and has been supported financially by the City of Holland with its CDBG funding for several years. The tables on the following pages represent the findings of their testing work in the City.

Table 18: Complaint Based Tests by Basis of Complaint

(Fair Housing Center of West Michigan (FHCWM) Fair Housing Testing of Properties in Holland, Michigan, June 1, 2015 - June 15, 2022)

Basis of Complaint*	Number	Percent
Age	6	6.3%
Disability Status	31	32.3%
Familial Status	21	21.9%
Gender	3	3.1%
National Origin/Ethnicity	5	5.2%
Marital Status	3	3.1%
Race/Color	17	17.7%
Religion/Creed	0	0%
Sexual Orientation	1	1.0%
Source of Income	9	9.4%
Total Complaints	70	

*Complaint may have more than one basis; percentages are out of a total of 96 complaint bases.

Table 19: Complaint Based Tests by Property Type(

Fair Housing Center of West Michigan (FHCWM) Fair Housing Testing of Properties in Holland, Michigan, June 1, 2015 - June 15, 2022)

Complaints by Property Type	Number	Percent
Mortgage	2	2.9%
Sales	9	12.9%
Reasonable Accommodation	11	15.7%
Reasonable Modification	5	7.1%
Rental	41	58.6%
Retaliation	1	1.4%

Zoning	1	1.4%
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Summary of Complaints

Over 7 years from 2016 through 2022, a total of 70 complaints of housing discrimination within the City of Holland were filed with the FHCWM. About one-third of complaints (31.3%) allege discrimination based on disability status of the complainant. Familial Status also made up a significant portion of complaints (21.9%), as well as Race or Creed related complaints (17.7%).

The majority of complaints (58.6%) alleged discrimination relating to rental housing. Reasonable Accommodation and Reasonable Modification related complaints are specific to accommodations and modifications for rentals, bringing the total percentage of rental-specific complaints up to 81.4%.

Table 20: Complaint Based Tests by Protected Class.

(Fair Housing Center of West Michigan (FHCWM) Fair Housing Testing of Properties in Holland, Michigan, June 1, 2015 - June 15, 2022)

Basis	Total	E	NSD	INC
Disability	13	3	5	5
Familial Status	34	11	21	2
Gender-Female	2	2	0	0
Marital Status	1	0	1	0
National origin-Hispanic/Latino	7	4	2	1
Race-Black	25	11	12	2
Race-Other	1	1	1	0
Sexual Orientation	2	1	0	1
Source of Income	8	0	7	1
Total	94	32	49	12

Table 21: Complaint Based Tests by Type

(Fair Housing Center of West Michigan (FHCWM) Fair Housing Testing of Properties in Holland, Michigan, June 1, 2015 - June 15, 2022)

Type	Total	E	NSD	INC
Design & Construction	3	0	2	1
Lending	4	2	2	0
Rental	64	18	34	12
Sales	23	12	11	0
Total	94	32	49	13

- E** = Evidence of differences in treatment-based variable tested
- NSD** = No significant differences in treatment
- INC** = Inconclusive / unable to discern if there are or are not differences in treatment

Summary of Tests

Between January of 2016 and December of 2022, the FHCWM conducted 94 tests of potential housing discrimination in the City of Holland. Tests were a mixture of complaint-based, systemic, and audit testing. Just over half of all tests (52%) found no significant differences in treatment between protected classes, one-third (34%) found evidence of differences in treatment, and the remainder of tests (12%) were inconclusive.

Thirteen (13) tests based on disability status were conducted, of which 23.1% found evidence of discrimination. Thirty-four (34) tests were conducted based on familial status, with 32.4% resulting in evidence of discrimination. Of two (2) gender-based tests, both found evidence of discrimination against female participants. In one (1) test, no conclusive evidence of discrimination based on marital status was found. In seven (7) tests for national origin-based discrimination against Hispanic/Latino individuals, 57.1% found evidence of discrimination. Across twenty-five (25) tests of race-based discrimination against Black individuals, 44% found evidence of discrimination. For testing of discrimination against other races across two tests, 50% found evidence of discrimination. Two (2) tests for discrimination based on sexual orientation were conducted, one of which found evidence of discrimination. Finally, out of eight (8) tests conducted for discrimination based on source of income, none found conclusive evidence of discrimination.

Of the 94 survey tests, the majority were conducted on rentals (68.1%). Of rental tests, 28.1% found evidence of discrimination, 53.1% found no significant evidence, and 18.1% were inconclusive. Twenty-three tests were conducted on sales, making up 24.5% of tests. Of sales tests, 52.2% found evidence of discrimination and 47.8% found no significant evidence.

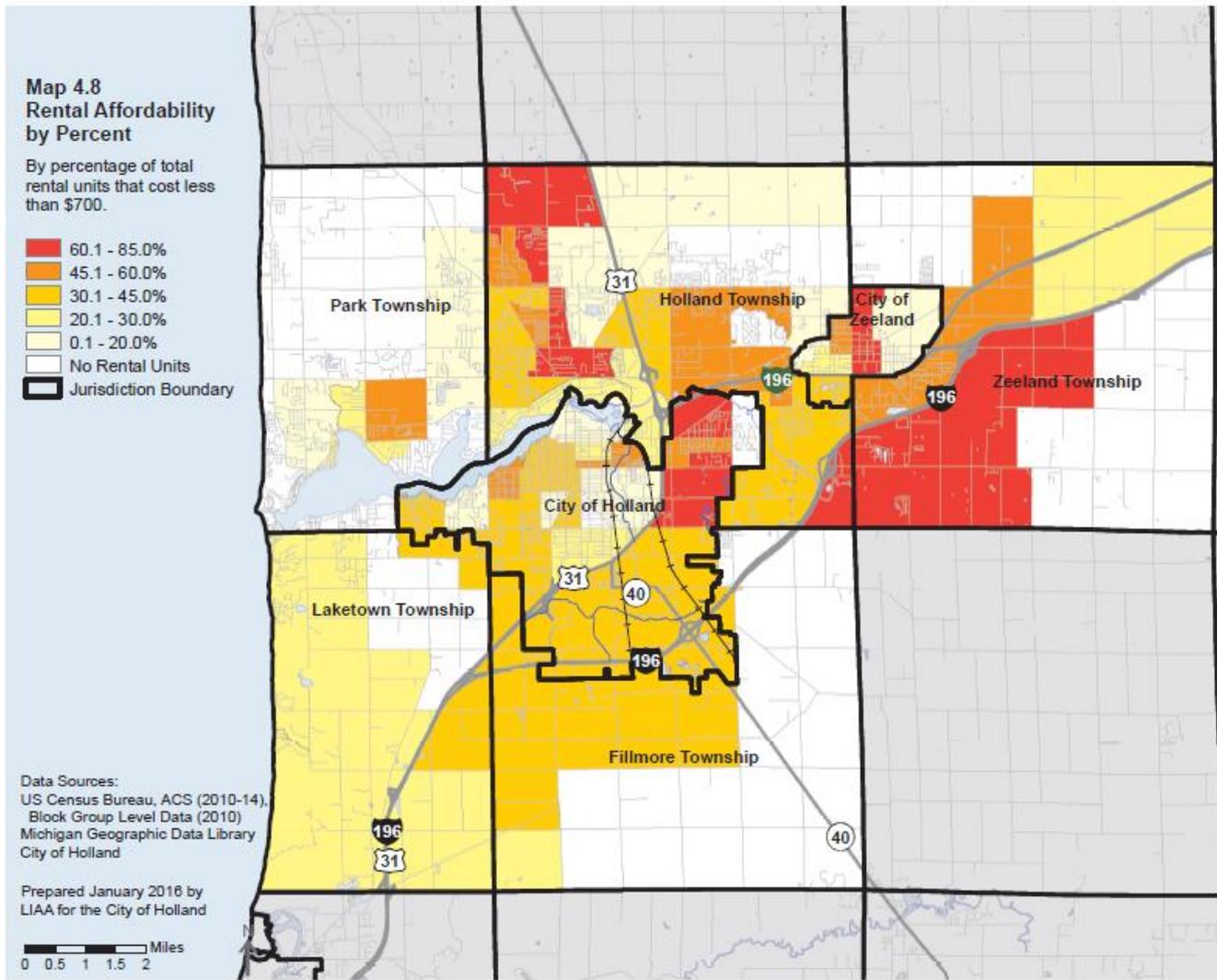
05.

Master Plan & Zoning Opportunities and Challenges

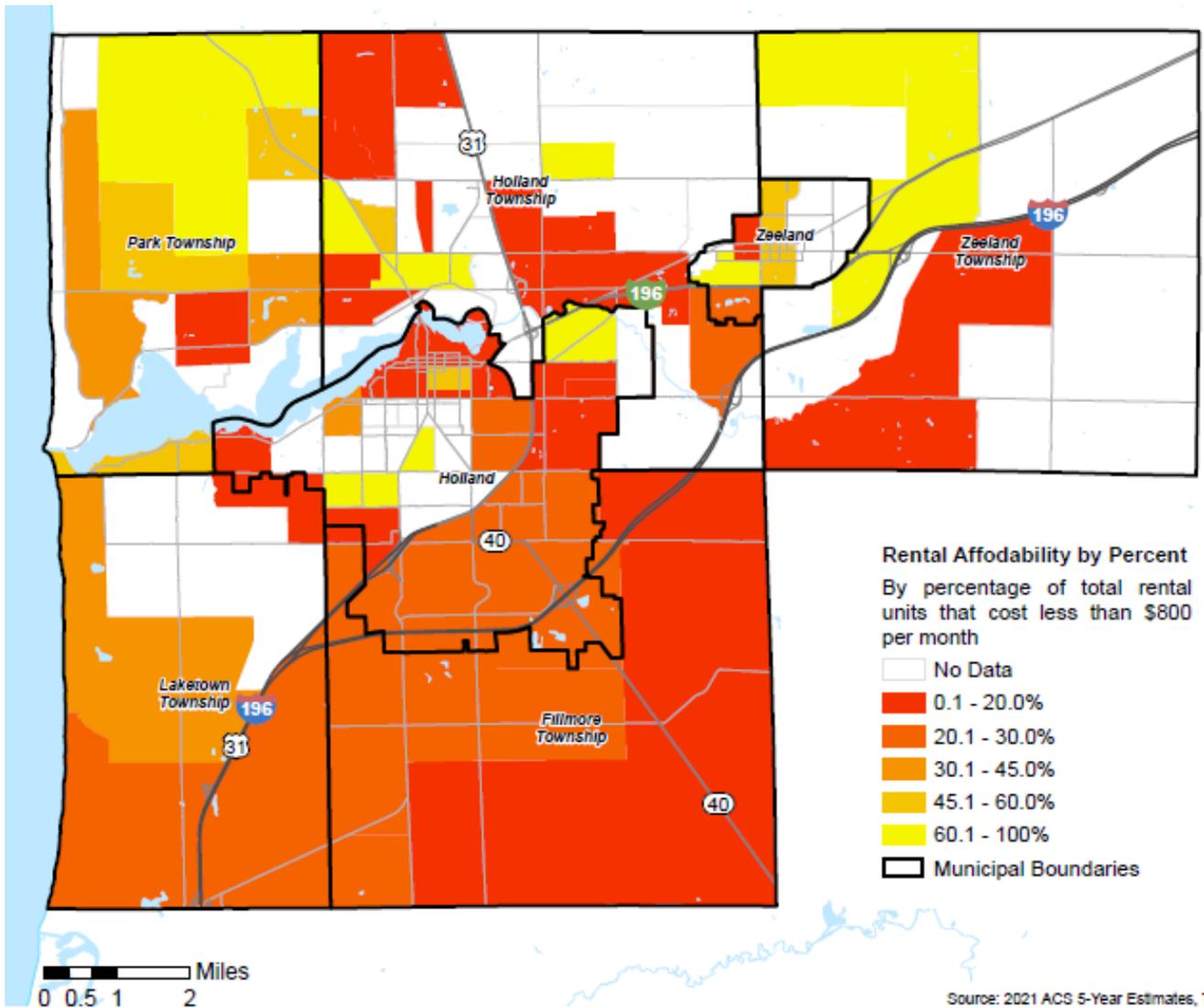
Master Plan

At the time of the completion of this 2023 Analysis of Impediments to Fair Housing, the City of Holland was undertaking a “Refresh” to its 2017 Master Plan. The 2017 City of Holland Master Plan analyzed housing data and provided recommendations for market interventions that would improve access and affordability. The 2023 Refresh updated that data, showing that the problem of housing affordability had become even more severe, especially in the most desirable neighborhoods of the City and region. A map of rental affordability by Census Tract was included in both the 2017 and 2023 plans. The maps are shown below for comparison.

Map 27: Rental Housing Affordability, 2016 (from Holland Master Plan 2017)



Map 28: 2020 Rental Housing Affordability, 2021 (from Holland Master Plan 2023)



While data is not available for all neighborhoods, the trend is clear—even though the City increased its threshold for housing affordability from \$700 to \$800, the percentage of rental units that were deemed “affordable” plummeted. The decline in affordability occurred region-wide, but the biggest increases were in outlying areas, which have limited access to jobs and public transportation.

There are some areas in the core of Holland where the percentage of rental units renting for under \$800 is over 60% - particularly the portion of the “Westcore” neighborhood south of 16th Street, and the neighborhoods south of 32nd Street and west of Washington Avenue. These areas are a bright spot for housing access – they have public transportation links, as well as retail, parks, jobs, and schools in close proximity. Unfortunately, opportunities for additional build-out of housing in these areas are limited.

Master Plan Housing Goals

During the 2023 Refresh, the City of Holland updated the housing goals in the Master Plan, based on community engagement and progress made by the City since the 2017 Plan. The following chart was included in the Master Plan refresh, demonstrating the change from 2017 to 2023:

2017 Action Step	Progress Since 2017	2023 Public Engagement	2023 Action Step
Identify desired housing types and densities for different neighborhood areas and ensure that the Zoning Ordinance supports their development.	UDO	45% "Strongly Agree" that Holland needs a wider variety of housing. 50% "Strongly Agree" that Holland should promote housing diversity. However, only 13% Strongly Agree that their neighborhood needs a wider variety of housing and only 9% Strongly Agree that their neighborhood has land available for new housing.	Identify desired housing types and densities for different neighborhood areas and ensure that the Zoning Ordinance supports their development.
Promote higher-density development that is well-designed and amenity-rich along with a mix of housing unit types in redevelopment and infill development projects adjacent to and in Downtown and on major thoroughfares.	UDO FBC, RMU, NMU, and CMU Districts.	Percentage of Respondents stating that a housing type would be "appropriate on a major road" or "appropriate downtown" in the online Visual Preference Survey: <ul style="list-style-type: none"> • Urban Single Family: 54% on Major Roads, 54% Downtown • Suburban Single Family: 75% on Major Roads, 24% Downtown • Attached Townhouses: 84% on Major Roads, 22% Downtown • Cottage Court: 71% on Major Roads, 40% Downtown • Duplex: 82% on Major Roads, 35% Downtown • Suburban Multi-Family: 94% on Major Roads, 32% Downtown • Urban Multi-Family: 89% on Major Roads, 62% Downtown • Mixed Use: 76% on Major Roads, 68% Downtown • High-Rise (12ish stories): 72% on Major Roads, 63% Downtown 	Promote higher-density development that is well-designed and amenity-rich along with a mix of housing unit types in redevelopment and infill development projects adjacent to and in Downtown and on major thoroughfares.
Promote and support the renovation, rehabilitation and increased energy efficiency of existing housing stock throughout the City.	UDO Non-Conformity Relaxation UDO TNR District	51% "Strongly Agree" that the City should promote renovation of existing housing stock, but only 29% Strongly Agree that it should be financially subsidized by the City. That number increases to 39% if the money is State or Federal.	Promote and support the renovation, rehabilitation and increased energy efficiency of existing housing stock throughout the City.
Pursue the creation and funding of programs that provide for the maintenance and rehabilitation of our housing stock, including the City's Home Repair Program and the City's Home Energy Retrofit Program.	Home Repair Program Home Energy Retrofit Program		Pursue the creation and funding of programs that provide for the maintenance and rehabilitation of our housing stock, including the City's Home Repair Program and the City's Home Energy Retrofit Program.

2017 Action Step	Progress Since 2017	2023 Public Engagement	2023 Action Step
Work with nearby jurisdictions to identify the regional need for affordable housing and devise strategies to provide affordable housing throughout the region.	Housing Next MSHDA New Housing Developments	45% "Strongly Agree" that Holland needs a wider variety of housing. 50% "Strongly Agree" that Holland should promote housing diversity.	Work with nearby jurisdictions to identify the regional need for affordable housing and devise strategies to provide affordable housing throughout the region.
Work to promote the design and construction of affordable housing that changes perceptions of its quality and makes it a desirable element of the community.	UDO TNR, CMU, GMU, and I Districts.	However, only 13% Strongly Agree that their neighborhood needs a wider variety of housing and only 9% Strongly Agree that their neighborhood has land available for new housing.	Work to promote the design and construction of affordable housing that changes perceptions of its quality and makes it a desirable element of the community.
Promote housing diversity to accommodate different household sizes, income levels, housing types, and density.			Promote housing diversity to accommodate different household sizes, income levels, housing types, and density.
Encourage owner occupied housing; occupancy or ownership by transient, disrespectful, or non-investing individuals is discouraged.			Encourage the creation of housing units available and affordable to entry-level buyers.
			Continue to advocate for local control of short term rentals, including control of proliferation in residential districts, in order to protect the supply of housing.

Impediments Identified in the Master Plan

The City of Holland’s stated goal in its Master Plan is to promote housing access, and it has taken steps to achieve that, particularly through zoning reform. However, issues remain. This analysis identifies the following Impediment to Fair Housing Choice reflected in the Master Plan:

- Local Opposition to Housing Development (Highly Significant):** The 2023 Master Plan public engagement survey produced a striking result – 45% of respondents “strongly agreed” the Holland area needs a wider variety of housing and 50% “strongly agreed” that Holland should promote housing diversity. But only 13% strongly agreed that their neighborhood needed housing diversity, and only 9% strongly agreed that their neighborhood had land available for new housing. This disconnect highlights a significant impediment to housing growth in Holland – residents approve of housing in general but oppose it when it is proposed near to them.

Market Based Impediments Requiring Planning Solutions

The housing market in Holland presents Impediments to Fair Housing Choice that must be addressed proactively. In order to form an organized series of market interventions that promote housing choice, the Master Plan must address these market-based problems. Specifically, this analysis identifies the following market-based Impediments to Fair Housing Choice that should inform planning and zoning actions:

- Lack of Attainably Priced Housing (Highly Significant):** While this is a market-based problem, and not an impediment arising from City policy, the Holland region has seen a spike in housing prices since 2020. The Master Plan envisions actions to intervene, but they face barriers to implementation and success.
- Lack of Starter Homes (Highly Significant):** While this is another market-based problem, and not an impediment arising from City policy, the City has been unable to substantially improve the availability of entry-level homeownership products. Zoning reforms that promote “missing middle” housing types (such as the GMU Greenfield Mixed Use and TNR Traditional Neighborhood Residential Districts) or allow for the conversion of former industrial sites to residential (such as the RMU Redevelopment Mixed Use District) could create more condominiums and other entry-level homeownership but have not done so in significant numbers to date.

Zoning Ordinance

The City of Holland adopted a new Zoning Ordinance in 2021. Among other goals, one of the key reasons for re-writing the Ordinance was to create new opportunities to increase housing supply, including providing opportunities to diversify housing types throughout Holland’s neighborhoods. The new Zoning Ordinance contains a multi-pronged approach to zoning reform aimed at creating diverse, mixed-income neighborhoods. As the new ordinance has just been in existence for two years, it is understood that it will take time for its changes to take full effect and to fully evaluate its impact. These changes are a positive move in the direction of providing more housing opportunities. The key housing policies of the 2021 Zoning Ordinance (known as the “Unified Development Ordinance” or “UDO”) include:

- **Continuation of the Fair Housing Accommodation Policy (Section 9.10).** The Holland Zoning Ordinance has long had a provision included that allows the provision of fair housing accommodations for persons with disability, even if those accommodations would otherwise violate a dimensional requirement, such as a setback. This provision was continued in the UDO.
- **Accessory Dwelling Units (Section 9.07).** Accessory Dwelling Units are permitted in most residential districts, including LDR Low Density Residential, which is otherwise a single family district. The city also revised the UDO in 2022 to modify some requirements on Accessory Dwelling Units, including expanding the number of persons permitted to reside in an ADU, and allowing for more flexibility in unit size.
- **Mixed Use and Form Based Districts (Articles 2 and 3).** The Unified Development Ordinance includes a variety of Mixed Use and Form Based Districts that are designed to increase housing supply and diversity throughout the city, while also providing amenities and retail within walking distance of many households. The districts include:
 - **F-CDT/NDT/EDT/WDT Form Based Central/North/East/Waterfront Downtown.** These districts allow for mixed use development, including the construction of a variety of housing types, in and around Downtown Holland.
 - **F-CENT Centennial.** This district allows for redevelopment surrounding Centennial Park, while maintaining the architectural character of the park’s context.
 - **F-WASH/SIXT/SSV Washington/Sixteenth/South Shore Village.** These districts support the enhancement of some of the City’s key neighborhood business districts.
 - **F-RM River-Michigan.** This district allows for walkable redevelopment of the connected River Avenue and Michigan Avenue corridors, with the potential for creating new amenities and housing in the neighborhoods near Holland Hospital.
 - **NMU Neighborhood Mixed Use.** This district is designed to preserve and enhance the smaller neighborhood business districts throughout Holland, providing housing and amenities.
 - **RMU Redevelopment Mixed Use.** This district is designed to expand the allowable uses in older industrial and business corridors, including the conversion of antiquated industrial buildings to residential.
 - **CMU Corridor Mixed Use.** This district is designed to allow for the retrofit of auto-oriented corridors into mixed-use, transit-oriented boulevards.
 - **GMU Greenfield Mixed Use.** This district is designed to require new neighborhoods to be mixed-density, as well as allowing for the provision of retail and amenities, instead of isolated single family subdivisions.
- **Non-Industrial Outlots (Section 2.16.D).** In the I Industrial District, housing can be constructed on lots split off from existing industrial uses. This tool is designed to allow workforce housing to be constructed in close proximity to jobs.
- **Elimination of the Rental Restriction Overlay District.** Prior to the adoption of the UDO, the Holland Zoning Ordinance had a provision that allowed a group to gather signatures and prevent the creation of rental housing in their neighborhood.

Though never used, that provision had the potential to restrict housing choice and limit housing access. The UDO eliminated that provision.

- **Limited Allowance of Short-Term Rentals.** Short term rentals are very restricted in residential districts, with a hard cap of 25 imposed. This ensures that housing units are available for residents and avoids the additional price pressure that has occurred in nearby communities due to the proliferation of short term rentals.

Limitations of the UDO

The UDO process was not completely successful in removing all zoning-related Impediments to Fair Housing Choice. Due to public advocacy, both in favor of existing provisions that limit housing choice, and against policies that would encourage housing choice, the following aspects were included in the UDO:

- **Restrictions on Accessory Dwelling Units (Section 9.07).** While there are opportunities to construct Accessory Dwelling Units in many Holland neighborhoods, there are also restrictions. Attached Accessory Dwelling Units are prohibited City-wide. Accessory Dwelling Units are also not permitted in the Central Park Neighborhood (due to the restrictions of the CNR Cottage Neighborhood Residential District) and the Hope Neighborhood (due to the restrictions of the Hope Neighborhood Overlay (see below).
- Further, Section 9.07 imposes limitations that make Accessory Dwelling Units impossible to build on some lots, and increase the cost on others. Examples of those limitations include:
 - Setback requirements that treat detached ADUs as principal structures, rather than accessory structures.
 - The minimum lot size and minimum lot width for “Tier 2” ADUs, which restrict the size of ADUs on some otherwise conforming lots in the LDR, MDR, and TNR Districts.
 - The Infill Design requirements, which add cost and delay approvals.

Even with the reduced restrictions adopted in 2022, City staff estimates that only 7 ADUs have been constructed in Holland since the adoption of the original ADU ordinance in 2015, with two more under construction at the time of this report.

- **Single Family Zoning Districts (Article 2).** The LDR Low Density Residential and CNR Cottage Neighborhood Residential Districts are single family districts that restrict housing growth and housing type diversity. LDR is the largest residential zone district in the city, and while ADU's are permitted by right in this district, the requirements of this district in not allowing for other housing types creates a clear impediment to the construction of attainably priced market rate housing in much of the city. Attempts to allow duplexes in the LDR District were scuttled during the UDO process due to public opposition.
- **Hope Neighborhood Overlay (Section 2.21).** The Hope Neighborhood Overlay prohibits Accessory Dwelling Units, duplexes, triplexes, quadplexes, and the renting of rooms to boarders, even though all of those would be allowed in the underlying TNR Traditional Neighborhood Residential District. This neighborhood overlay district consists of the Hope College campus and several residential blocks immediately adjacent to the campus. The residential portion of the district contains a substantial amount of rental housing occupied predominantly by students. The overlay district was created to "preserve the single detached dwelling unit character in close proximity to those properties located in the education zone district where higher density uses are allowed" (UDO, Section 39-2.21). The district is intended to maintain balance between the density existing in the education zone district coupled with the density in the residential areas the pre-dated the creation of the overlay district, and the remaining residential area that continues as owner-occupied. Despite this rationale for limiting housing options within this district, the result is the limitation of housing types in an area that is walkable, close to downtown and transit, and as such is otherwise well-suited for increased density and a variety of housing types.

Economic pressures have also reduced the effectiveness of the housing policies in the UDO. Despite efforts to increase housing supply and access, prices continue to increase. Some tools, such as ADUs, Non-Industrial Outlots, and retrofits of auto-oriented corridors have not yet been widely implemented by the private sector.

Further, while the TNR District allows the conversion of single family homes to duplexes, triplexes, and quadplexes by right, the cost of acquiring the homes in that district is frequently too high to make a conversion economically feasible. In fact, data collected for the Master Plan suggests that the core neighborhoods of Holland have actually lost housing units over the past 10 years as subdivided homes have been converted back to single family.

Impediments Identified in the Zoning Ordinance (UDO)

One of the City of Holland's stated goals in adopting the UDO was to promote housing access. As stated above, the Ordinance contains a multi-pronged approach to zoning reform aimed at creating diverse, mixed income neighborhoods. The ordinance, being newly adopted, will take time for its changes to take full effect. On the whole, the ordinance represents positive change and over time should result in the provision of more housing choice. Despite this expected progress, impediments to housing choice will persist.

This analysis identifies the following the following Impediments to Fair Housing Choice:

- **Restrictive Zoning Districts and Overlays (Moderately Significant):** The UDO contains two single family zoning districts (LDR and CNR), as well as the restrictive Hope Neighborhood Overlay. These regulations result in neighborhoods with reduced diversity of housing type, and significant barriers to affordability and housing choice. This impediment is rated "moderately significant" because of the possibility that other zoning districts could be used in these neighborhoods to promote housing access.
- **Local Opposition to Housing Development (Highly Significant):** The UDO development process included significant public engagement. While public engagement is always important and valuable, in this case, pressure from some neighborhoods resulted in districts and overlays with limited options, creating barriers to housing choice. Similar opposition continues to be an impediment to the use of other UDO housing development tools, particularly those that require discretionary approvals.
- **Economic Impediments (Highly Significant):** Some UDO housing development tools have not been used widely because economic forces— particularly the price of land and buildings—do not support them. Tools other than zoning reform must be used in conjunction with these policies to ensure they are economically realistic.

06. Conclusions

Impediments to Fair Housing

The Analysis of Impediments to Fair Housing Choice revealed several key factors impacting fair and equitable access to housing in the City of Holland. While not exhaustive, these key impediments are summarized as follows:

1. **Racial Disparities in Housing Access:** The demographic data indicates significant racial disparities in homeownership rates and housing cost burdens. Non-White households, particularly Black and Hispanic households, are more likely to face challenges in accessing homeownership and are disproportionately burdened by housing costs.
2. **Unequal Representation in Publicly Supported Housing:** The representation of racial/ethnic groups in publicly supported housing is not proportional to their population in the city. Black Non-Hispanic residents are over 20 times more likely to live in publicly supported housing than White Non-Hispanic residents, indicating potential disparities in access to affordable housing assistance.
3. **Limited Housing Options for Families with Children:** The data reveals that only 9.81% of Project-Based Section 8 units in the City of Holland have more than three bedrooms, despite 28.61% of households in this program having children. This indicates a potential lack of larger housing options for families with children in publicly supported housing.
4. **Accessibility and Accommodations for Individuals and Households with Disabilities:** Persons with disabilities are distributed evenly across the overall population in the City of Holland. However, cognitive difficulties are more prevalent in the southern portion of the city. It's important to note that the data does not identify the number of individuals with disabilities but rather the total number of types of difficulties faced by people with disabilities. Ensuring that housing options are accessible and accommodating to individuals with different types of disabilities is crucial to promoting fair housing.

Addressing these impediments requires a comprehensive and targeted approach that involves policies and initiatives to promote housing affordability, reduce racial disparities, increase the availability of accessible housing, and improve overall housing conditions. Collaborative efforts from government agencies, housing authorities, community organizations, and stakeholders will be essential to creating a more equitable housing landscape in the City of Holland.

07. Fair Housing Recommendations and Action Plan

Summary of Potential Impediments

Determinants of:	Level of Influence:		
	Not Significant	Moderately Significant	Highly Significant
Racial and Ethnic Segregation:			
Land Use and Zoning		•	
Occupancy Restrictions		•	
Residential Real Estate Steering		•	
Community Opposition			•
Economic Pressures		•	
Major Private Investments		•	
Municipal and State Services		•	
Foreclosure Patterns	•		
Publicly Supported Housing Location and Occupancy:			
Land Use and Zoning			•
Siting Decisions for Public Housing	•		
Siting Decisions for LIHTC Housing		•	
Siting Decisions for Other Publicly Supported Housing		•	
Community Resistance to Publicly Supported Housing			•
Regional Collaboration or Lack Thereof		•	
Housing Choice:			
Availability of Housing Choice Vouchers			•
Admission or Residency Preferences	•		
Quality of Fair Housing Counseling Programs		•	
Rate of Landlord Participation in Fair Housing Programs		•	
Prevalence of Housing Discrimination		•	

Determinants of:	Level of Influence:		
	Not Significant	Moderately Significant	Highly Significant
Disproportionate Housing Needs:			
Land Use and Zoning			•
Occupancy Restrictions		•	
Economic Pressures		•	
Availability of Two+ Bedroom Affordable Units			•
Availability of Two+ Bedroom Publicly Supported Units			•
Housing Stock Deterioration	•		
Foreclosure Patterns	•		
Private Investments		•	
Disparities in Access to Community Assets/Exposure to Adverse Community Factors			
Presence and Location of Proficient Schools	•		
School Assignment Policies	•		
Availability and Reliability of Public Transportation		•	
Location of Employers	•		
Patterns of Public Investment	•		
Private Investments		•	
Regional Collaboration of Lack Thereof		•	
Disability and Access Issues			
Availability of Affordable Accessible Housing			•
Siting of Accessible Housing	•		
Availability of Assistance for Modifications			•
Restrictive Zoning Laws		•	
Access to Publicly Supported Housing			•
Availability of Transit Assistance		•	
Availability of Wraparound Supportive Services		•	
Access to Proficient Schools	•		
Availability of Public Transportation		•	
Accessibility of Public Transportation		•	
Fair Housing Compliance and Infrastructure			
Unresolved Violations	•		
Community Opposition		•	
Support from Public Officials	•		
Housing Discrimination		•	
Availability of Fair Housing Education		•	
Availability of Housing Resources		•	

Action Plan

1. **Enhance Fair Housing Education and Outreach:** The City of Holland and the Fair Housing Center of Western Michigan (FHCWM) have developed a close working relationship over the years. However, local community opposition to multifamily and affordable housing, as well tenant and homebuyer discrimination, remain ongoing challenges for the City and its residents. The City should continue and deepen its partnership with FHCWM by conducting fair housing education campaigns to raise awareness about fair housing rights and resources available to residents. This could include workshops, community forums, and informational materials in multiple languages. Direct outreach to local small and medium-sized residential landlords and building managers should continue to be a priority for the City, with an added emphasis on the importance of actively maintaining fair rental practices.

One specific action recommended by this Analysis is that the City implement policies to expand zoning public hearing notices beyond the minimum timeframes, types of publications, and geographic scope required by the State of Michigan. Notices could be provided further in advance than the minimum 15 days, be published on social media and online sources in addition to the Holland Sentinel, and provided to property owners beyond the minimum 300 feet.

2. **Improve Housing Accessibility, Wraparound Services, and Supports for People with Disabilities:** The need for measures to improve accessibility for both renters and homeowners with disabilities, especially those facing cognitive and ambulatory difficulties, was strongly evidenced in the public feedback, fair housing and demographic data presented in this report. The City should magnify its efforts to address inconsistencies in access to services and supports for people with disabilities, ensure that its fair housing enforcement emphasizes the need for landlords to make reasonable accommodations for tenants with disabilities when requested, and implement policy initiatives which promote housing accessibility. Such policy initiatives may include adding universal design regulations to the City zoning ordinance, as well as providing financial assistance for accessibility modifications for homeowners and landlords. Encouraging local ownership of housing units and neighborhood wealth building can also help mitigate this concern.
3. **Promote Affordable Housing Initiatives:** The City should continue to implement policies and incentives to increase the availability of affordable housing units in Holland. This should include maintaining and expanding its partnership with nonprofit affordable housing developers such as Dwelling Place, Lakeshore Habitat for Humanity, and Jubilee Ministries, working with Hope College to ensure that property acquisition for new student housing complies with the City's Comprehensive Plan and does not inadvertently cause displacement of existing neighborhood residents, and providing financial assistance, tax incentives, or additional zoning changes to encourage the development of affordable housing options.
4. **Address Racial Disparities in Homeownership:** The City should work with its partners to develop programs that support minority households in accessing homeownership opportunities. This could include financial assistance for down payments as well as homeownership education and pre- and post-purchase housing counseling. The City should also continue to partner with FHCWM to identify and combat discriminatory lending practices that impact residents, creating barriers to entry for first-time, low and moderate income, minority homebuyers as well as homebuyers with disabilities.
5. **Transportation Solutions:** The City should continue to work to address transportation accessibility and affordability issues. It should begin by identifying potential gaps in the existing bus service network and schedule, as well as assessing the availability of accessibility features throughout the existing bus fleet. It should also work to enhance coordination between housing development and public transportation to ensure better access to job opportunities and essential services for residents.

By implementing these recommended action items, the City of Holland can work towards creating a more equitable and accessible housing environment, where all residents have equal opportunities to secure safe, affordable, and suitable housing regardless of their race, ethnicity, or disability status.