

Analysis of Impediments to Fair Housing

Prepared for the:

City of Livonia

Charter Township of Redford

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Part 1 – Introduction

This Analysis of Impediments to Fair Housing (AI) was conducted in conformance with guidance provided by the U.S. Department of Housing and Urban Development's (HUD), Fair Housing and Equal Opportunity (FH/EO) Division, in order to identify and mitigate any barriers to fair housing within CDBG jurisdictions of the City of Livonia and the Charter Township of Redford, also called the "study area", "communities" or "jurisdictions". Fair housing laws charge the Secretary of HUD with the responsibility to enforce fair housing statutes and their implementing regulations in the United States. In addition, HUD oversees the distribution of Federal housing and community development program assistance throughout the U.S. and its territories.

Many municipalities are entitled to receive Community Development Block Grant (CDBG) and Home Investment Partnership Act (HOME) Program funding administered by HUD's Office of Community Planning and Development, hereafter referred to as CPD. Each entitled recipient must establish its basic housing and community development priorities, objectives, and specific activities in a Five Year Housing and Community Development Consolidated Plan; and then, annually, incrementally lay out programs and activities designed to meet those priorities in an Annual Action Plan. The recipient must also certify, to HUD, as a condition of receiving CDBG and HOME funding, that it will affirmatively further fair housing. Satisfaction of basic Consolidated Plan requirements, including the Certifications, is prerequisite to participation in HUD's formula entitlement programs. Other HUD programs, such as Emergency Shelter Grant, or ESG, Public Housing and Section 8 Housing Choice Vouchers also require a certification of compliance with the fair housing requirements.

In order to comply with the Fair Housing certification, each recipient is required to analyze housing patterns and practices for any impediments to fair housing, and to develop remedies for any barriers identified. The recipient must then implement, and monitor the implementation of the corrective measures identified. These actions form, in effect, a fair housing planning and implementation cycle, which HUD expects will become the basis of fair housing planning throughout the country.

Both jurisdictions have previously prepared individual AI's, but recognize the need for a new analysis since demographic, social, and housing conditions change over time. Recognizing the complexity of fair housing issues and the increasing inter-dependence between each jurisdiction, the communities agreed to jointly produce what is intended to be a more comprehensive, thorough, and effective assessment of fair housing within the study area than would otherwise be possible. Both jurisdictions, moreover, also believe that a combined analysis could result in greater effectiveness, not only of analysis, but also (if needed) of remedy.

This Analysis provides information pertaining to demographic and housing conditions, fair housing requirements, fair housing safeguards, and impediments to fair housing and recommended corrective actions.

Many sources of information were used to compile this document, including the jurisdictions Consolidated Plans; Comprehensive Annual Performance and Evaluation Reports (CAPERs); previous AI's, comprehensive planning documents; and a wealth of other information from government and private institutions; and also, of course, from citizens.

Most citizen and other public involvement occurred through two public hearings held during March 2004. Invitations were sent by two basic means: first, public notices were published in the Livonia Observer and in the Redford Observer. Specific letters of invitation were also sent to representatives of stakeholder organizations which represent individuals protected under fair housing law. The first meeting, designed to obtain views on fair housing practices in the communities, occurred at the Redford Township Community Center on March 4, 2004, while the second hearing, designed to present the final draft of the AI to the public, occurred on March 28, 2004, at the Silver Village housing complex in Livonia.

While each of the cited sources provided valuable information, citizen and stakeholder views were essential to provide an overarching fair housing perspective in the communities. We are grateful to everybody who contributed time and effort to this study.

In order to get started, it is necessary to define the basic concepts of this Analysis: "Fair Housing" and "Impediments to Fair Housing". The following definitions have been adopted by the City of Livonia and Redford Township for purposes of this study.

Fair Housing: equal and free access to residential housing choices regardless of race, color, religion, sex, age, disability, familial status (the presence of children), national origin, marital status, creed, ancestry, or unfavorable military discharge. Residential housing is fundamental to meeting essential needs and pursuing personal, educational, employment or other goals.

Impediments to fair housing: 1) any actions, omissions, or decisions taken because of race, color, religion, sex, age, handicap (disability), familial status (the presence of children), national origin, marital status, creed, ancestry, or unfavorable military discharge, which restrict housing choice, or 2) any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, age, disability, familial status or national origin or marital status, creed, or ancestry.

A central tenet of this study is that affordable housing is linked to fair housing in much the same way that issues of race and class are linked. The reader will therefore find that this analysis assesses barriers to affordability, as well as fair housing issues. This assertion does not mean that racial and ethnic bigotry and discrimination have ended. They have not and, indeed, remain virulent throughout the country. It does contend, however, that they may be fading and that other forms of discrimination, not based solely on race and ethnicity, are coming to the fore.

A second tenet, concerns the dynamics of the neighborhood life cycle. Neighborhoods are established, grow and prosper, mature, and then may begin to decline as the physical environment changes (e.g. new and more exciting homes are built, with new and possibly better services offered elsewhere). Mainstream buyers would, under this

model, be more likely to choose those opportunities perceived as being more desirable. As the older neighborhood loses its cachet and the “smart” money moves elsewhere, prices may decline, and the neighborhood begins an economic and, possibly a racial or ethnic, transition which results in a re-segregation of the community. This often results little change in the lives of the lower-income or minority residents who moved for an improved quality of life. If this premise is true, it is necessary to address the root(s) of the problem which may have to do with market dynamics as much as racial and income prejudice. Fair housing would then involve the successful retention of middle-income and non-minority residents in neighborhoods at-risk of downward spiral, every bit as much as opening new housing opportunities for minority and lower-income persons.

A third tenet is that many minorities have, over the past 30 years, attained middle-, and even upper-middle-, income status, and have acquired the accoutrements of affluence; certainly including better housing. These families can be increasingly found throughout Metropolitan Detroit and; despite the region’s identification as being the most segregated major metropolitan area in the nation; subtle, yet significant demographic shifts are occurring. These changes will literally transfigure the regional landscape over time.

Still, much remains to be done. Minority un- and under-employment remains problematic on a national level, and those affected still cannot obtain decent and affordable housing. They are ill-housed either in 1) substandard homes and communities, or 2) in standard but (for them) costly homes. These problems are as severe, if not more severe, than those faced in the past; appear to be deeply rooted in many facets of life; and are becoming increasingly intractable. Ultimately, they threaten to permanently divide Americans along class lines strongly influenced by race and, sometimes, by ethnicity.

This observation is supported in a study prepared by a recent Brookings Institution study, which indicates that conditions in the Detroit area, although still bleak in the central city, improved markedly since the 1990 Census. It found that...

“residents of (the City of) Detroit appear to have greatly benefited from the strong Midwestern economy of the late 1990’s. Household incomes rose faster than in any of the other 22 Living Cities, and child poverty dropped by a stunning 13 percentage points. Homeownership also grew for most racial/ethnic groups. Despite this progress, significant challenges remain. Detroit ranks low among U.S. cities on median household income, and four in ten of the City’s families with children live below or near the poverty line. With such low incomes, many working families struggle to pay rent and save to buy a home...Income growth in the future may be limited by the fact that only one in nine adults in the city holds a college degree.”¹

It also found that growth continues outward from Detroit proper and, as a result, is beginning to affect not only the City of Detroit, but also older, inner ring suburbs.

¹ The Brookings Institution, Living Cities Detroit in Focus: A Profile from Census 2000, November 2000, Executive Summary, p. 1.

“The Detroit metro area continued to decentralize in the 1990’s amid slow growth region wide. Between 1980 and 2000, the City of Detroit lost one-fifth of its population. During the same period, the region’s suburbs grew modestly, but the locus of that growth shifted far from the core. In the 1990’s, a few neighborhoods in downtown Detroit gained residents, but population loss continued throughout the remainder of the city *and in nearly all inner suburbs.*”² (Emphasis added.)

It is clear that conditions in Detroit have, and will continue to, affect all suburban jurisdictions, particularly the inner-ring suburbs which may now be experiencing some of the same negative pressures that were once limited to Detroit itself. Understanding this phenomenon is central to this study since because although Redford Township and Livonia are largely middle-income communities and desirable places to live, both are likely to face the pressures caused by the de-concentration of population in the region. One therefore needs to consider fair housing in both communities in light of these trends. To sum, the focus of growth (and affluence) is reaching far beyond the central city’s core, and may bypass those communities abutting the City itself.

This study therefore contends that economic segregation is becoming more common and more central to the debate over equality. Consequently, Section IV, which identifies the impediments and recommendations for corrective action, identifies affordable, as well as fair housing issues. The reader will also find that attention has been devoted to ancillary issues such as educational opportunity, crime, and insurance practices which, although not directly related to fair housing, certainly affect it in significant ways.

Part 2

Population and Housing Characteristics

General Information

Each of the two communities is unique, but share similarities as well. Both are geographically proximate, being located in Wayne County due west of the City of Detroit. Redford Township has an irregular configuration, since much of its original territory was annexed by the City of Detroit during its period of explosive growth in the 1920’s. It shares boundaries with the Cities of Detroit to the east, Southfield to the north, and Livonia to the west, and Dearborn Heights to the south. Livonia borders Redford Township to the east, the City of Farmington Hills to the north, affluent Plymouth and Northville Townships to the west, and Westland to the south.

Both communities are mature, having been largely developed between the 1940’s and the 1970’s. Redford, which is closer to Detroit, was developed a little before Livonia, which lies to the west of Redford Township, beyond the central city’s boundaries. Both benefited from the out-migration by families from the City of Detroit and, to a lesser extent, from other suburbs, over the past 50 years. These families were young and upwardly-mobile, white, and seeking a better way of life. They found a variety of housing values and styles, from modestly constructed frame structures to more substantial and larger brick units.

² Ibid pp. 1 – 2.

As they mature, both communities are becoming more racially and ethnically diverse. Twenty years ago, there was virtually no minority representation in either jurisdiction. Several racial and ethnic groups are now represented. These are mostly African-American, followed by Asian-Americans, and by a smaller number of Hispanic-American residents. The increase in minority population has been more marked in Redford Township, where approximately 10% of the population is minority, than in Livonia, with about 5% minority residents. These numbers are still not proportional to corresponding populations within the Metropolitan Detroit area. See Table 4, on p. 10 below, for a more detailed comparison.

The 2000 census data is now almost 4 years old, but while some characteristics may have changed it still provides a base for measurement. Population and demographic characteristics and projections for the study area are found in the following Table.

**Table 1
General Population Characteristics of AI Study Area**

MUNICIPALITY	1990	2000	2004 ESTIMATE	2030 ESTIMATE	% GROWTH 1990 – 2004	PROJECTED GROWTH 1990 – 2030
Livonia	100,850	100,545	98,195	92,961	(2.6%)	(7.8%)
Redford Township	53,888	51,280	50,174	48,651	(4.8%)	(9.7%)
Wayne County	2,111,687	2,061,162	2,035,162	2,013,975	(4.6%)	(4.6%)
Metropolitan Detroit	4,590,468	4,833,368	4,912,450	5,408,349	7.0%	17.8%

Source: SEMCOG Community Profile Data – February 2004

The table reveals that although the population of metropolitan Detroit has increased, and is projected to increase through 2030, while the populations for Wayne County, Livonia and Redford are expected to decline. This is partially due to increases in the number of elderly households and in smaller-sized families in all communities represented, but may also reflect a continuation of the centrifugal growth and development patterns noted above. As noted, these patterns now affect the inner-ring suburbs as well as the core city, posing potentially serious challenges for the future. How can communities remain strong and vibrant facing strong economic and social forces? This, ultimately, is a question that every municipality must face.

Employment Characteristics

It goes without saying that a decent income is necessary to provide life’s essentials, including decent, safe and sanitary housing. Adequate income is also essential to gaining access (by virtue of community, neighborhood, or voluntary association) to other facilities and services which provide a high standard of living. Examples would include proximity to, or having easy access to, employment centers; having excellent public schools, which not only educate, but also help individuals make friends through clubs and informal associations; high quality and well-maintained parks and recreational facilities; and excellent libraries and cultural venues. These features create communities that individuals want to live, and remain, in.

Higher-income households demand, and receive, these amenities as a matter of course; choosing to live in those communities which can provide them and shunning those which cannot. Some localities therefore prosper while others do not. From a municipal perspective, a strong tax base is indispensable in order to provide desired services and

amenities, and in order to attract additional development and affluent residents. Land uses in the study area are demonstrated in the following table.

**Table 2
Land Use/Land Cover in 1995**

Land Use Type	Redford – 1990 Acres/%		Redford - 1995 acres/%		Livonia – 1990 acres/%		livonia – 1995 acres/%	
Single Family Res.	4,726	66%	4,727	66%	12,199	53%	12,256	53%
Multi-Family Res.	39	1%	39	1%	326	1%	326	1%
Commercial/Office	595	8%	595	8%	1,503	7%	1,568	7%
Institutional	453	6%	453	6%	1,563	7%	1,564	7%
Industrial	580	8%	580	8%	2,483	11%	2,479	11%
Transportation Commercial & Utility	97	1%	97	1%	637	3%	636	3%
Cultural, Outdoor, Recreation, Cemetery	491	7%	491	7%	1,506	7%	1,463	6%
Cultivated, Grassland, & Shrub	86	1%	86	1%	1,238	5%	1,185	6%
Woodland & Wetland	129	2%	129	2%	1,417	6%	1,391	6%
Water	0%	0%	0%	0%	88	0%	89	0%
Total Acres	7,196	100.00%	7,197	100.00%	22,960	100.00%	22,957	100.00%

SEMCOG: Community Profile Data, February 2004

Livonia and Redford diverge in land use to some extent. With two-thirds of its land area in residential use, and another 10% retained for non-revenue generating purposes, Redford Township is very much a bedroom community. The City of Livonia, if for no other reason than its larger geographic size, has more land area to devote to housing, office, commercial (including a mix of high- and lower-end retail), institutional, and industrial uses. Like Redford Township, over half of its land area is devoted to residential purposes but, unlike the Township, it has more acreage for commercial, institutional, and industrial uses. This has enabled it to develop several activity generating centers, drawing people from across western Wayne County and possibly the metropolitan area. Redford Township, on the other hand, shows comparable land-use ratios but has, significantly, a much smaller available land area to work with. It's commercial and industrial uses are older and more localized, making it better equipped to serve neighborhood and local needs for shopping, and employment. Both communities have been able to use tax revenues to provide a variety of excellent public services to residents.

It should be noted that large numbers of residents commute to employment centers located in Detroit and throughout the region, and transportation is therefore important to the economic viability of both communities. Both are situated adjacent to several major transit corridors, which have served as magnets for business growth and job creation. Interstate 96 provides direct access into Detroit on the east, and to points west, and funnels activity into both communities. Interstate 275, directly connects with I-75, an extremely busy commercial route providing transport from Detroit to Mexico. Both are critical to the movement of people and commerce, and both Redford Township and Livonia have flourished as a result of their proximity to them.

Unfortunately, the Detroit region does not have an easily accessible and reliable public transportation system. Both Livonia and Redford provide free or low-cost community transit Ride services, and Redford supports the SMART system through a millage. Livonia also provides senior van transportation and senior vouchers to ensure transportation for elderly residents. While good, these systems are not comprehensive and cannot meet current community needs. This poses a barrier to those who wish to use public transportation to commute to employment in either community. Lower-income people (including minorities) are more dependent on public transit, and its lack creates difficulties for them to get to employment opportunities. This pattern is identified in Table 3 below, which provides employment characteristics in 1990, in 2000, and makes employment projections through 2030.

Table 3
Livonia-Redford Employment Projections - 1990 – 2020

MUNICIPALITY	1990 FORECAST	2000 FORECAST	2030 FORECAST	% CHANGE 1990 – 2030
Livonia	91,135	105,019	112,831	23.8%
Redford	17,030	18,676	16,596	(3.5%)
Wayne County	976,193	(970,531)	1,035,915	6.1%
SE Michigan	2,350,238	2,673,052	3,109,481	32.3%

Source: SEMCOG Community Profile Data, February 2004

The data show that employment in both communities increased between 1990 and 2000. This is in keeping with employment trends in Southeastern Michigan, excepting Wayne County. Employment in Livonia is expected to continue grow over the next 30 years, although it is expected to decline in Redford Township by 3.5%. The reasons for the projected employment decline in Redford Township are not known.

Racial and Ethnic Concentrations

Broken into major racial and ethnic groupings, the makeup of the study area shows a steadily increasing minority population. SEMCOG Community Profile and 2000 Census data, see Table 2 below, provides a comparison of population characteristics for the study area, metropolitan Detroit, and for the State of Michigan as a whole. Changes have occurred within the study area in the racial and ethnic makeup of both communities, primarily among African-Americans and Asians.

Definition of Racially-Concentrated Area

Both communities are largely non-minority, and both strive to maintain racial and ethnic balance in all neighborhoods. They would consider a racially-concentrated area as one having 40% or more of its population belonging to one or several readily identifiable racial or ethnic groups. Forty percent is roughly 10% points higher than the 28% minority population found in Metropolitan Detroit in 2000 (see table 4 below), and a census tract at 40% minority population could be high enough for an objective observer to perceive it as being “minority”. There is only one census tract in the study area which exceeds the 40% threshold. Data for minority representation above racial concentrations by census tract are found in Table 5 below. Maps of minority locations for both communities are found in the Appendix.

**Table 4
Major Racial and Ethnic Groups in 1990 & 2000**

PLACE	TOTAL 1990 / 2000	WHITE	WHITE AS % OF TOTAL	AFRICAN – AMERICAN	BLACK AS % OF TOTAL	ASIAN	ASIAN AS % OF TOTAL
Livonia -1990	100,850	98,870	98.0%	265/	0.09%	1,346	1.3%
Livonia - 2000	100,545	95,975	95.4%	951	0.2%	1,951	1.9%
Redford - 1990	54,837	53,342	97.3%	379	0.7%	303	0.5
Redford – 2000	51,622	45,418	85.1%	4,410	8.5%	392	0.8%
Wayne Co. - 1990	2,111,687	1,212,007	57.4%	849,109	40.2%	21,394	1%
Wayne Co. - 2000	2,061,162	1,065,607	51.7%	868,992	42.2%	35,141	1.7%
Metro Detroit -1990	4,590,468	3,496,038	76.2%	974,716	21.2%	68,506	1.5%
Metro Detroit - 2000	4,833,368	3,481,652	72.0%	1,057,674	21.8%	123,949	2.6%
State of Michigan 2000	9,938,444	7,965,053	80.1%	1,412,742	14.2%	176,510	1.8%

**Source: SEMCOG Community Profile Data, 2/04,
State of Michigan characteristics taken from the 2000 Census, Summary File 3 – Table DP-1**

The table shows subtle but significant racial and ethnic changes in the study area between the 1990 and 2000 Census counts. First, the non-minority population is decreasing in both jurisdictions, as it is throughout Metropolitan Detroit. There is a concomitant rise in the number of African-Americans, Hispanics and Asians throughout all areas. To be sure, the numbers are not great, with the exception of Redford Township, where the African-American population increased almost 8% in 10 years. They all, however, point in the same direction; minorities are moving into areas which have historically been segregated. This may result from: fair housing legislation; increased opportunity of choice as fringe development continues; or attitudinal shifts (i.e. decreasing opposition to living in racially-integrated communities) among the white population. Each has merit. Whatever the reason(s), it is fair to say that minority families have more housing options now than in the past. In the final analysis both communities are becoming more open.

A look at the dispersion of minorities within the communities can be observed in Table 5 on the following page, which shows those census tracts having above the community proportion of minority residents. Those figures are 15% for Redford Township and 5% for Livonia. Please bear in mind that only one (higher income) census tract identified meets the standard for being a minority concentrated area as previously defined.

The data presented in this table may be inconsistent with other census information since the number of minorities in both communities appears to be greater than the total presented in Table 4 above would suggest. This may be due to the way that people were classified, but there are no definitive answers to this. The data for both communities, however, reveal that those minorities living in area with a greater concentration of minorities than found elsewhere would appear to have (sometimes significantly) higher incomes than found elsewhere in the community. This supports the contention that middle- and upper- income minority households have taken advantage of opportunities to obtain decent housing outside of minority-concentrated areas.

**Table 5
Minority Concentrations and Income Levels by Census Tract in AI Communities**

Census Tract #	% Minority residents	Income as % of 2003 MFI for area	2003 Est. MFI for Tract	Income description
Redford Township				
5548	27.65%	105.26%	\$70,208	Middle Income
5553	16.04%	103.00%	\$68,984	Middle Income
5554	56.02% ³	97.82%	\$65,246	Middle Income
5555	16.83%	95.01%	\$63,372	Middle Income
Livonia				
5561	7.63%	95.61%	\$63,772	Middle income
5562	9.96%	101.18%	\$67,487	Middle Income
5563	6.33%	119.61%	\$79,780	Middle Income
5564	10.92%	180.41%	\$120,333	Upper Income
5565	5.87%	124.14%	\$82,801	Upper Income
5569	7.21%	126.92%	\$84,656	Upper Income
5570	11.73%	96.66%	\$64,472	Middle Income
5571	9.02%	114.93%	\$76,658	Middle Income
5576	6.05%	157.39%	\$104,979	Upper Income
5582	6.28%	101.30%	\$67,567	Middle Income
5583	5.89%	89.20%	\$59,496	Middle Income
5584	5.89%	132.83%	\$88,598	Upper Income
5586	6.55%	116.12%	\$77,452	Middle Income
5590	5.15%	105.57%	\$70,415	Middle income
5591	5.67%	107.15%	\$71,469	Middle Income
5592	5.60%	102.01%	\$68,041	Middle Income

Source: 2000 Census Data, Obtained from Government Website www.ffiec.gov

This contention was supported by a Livonia stakeholder who indicated that there really aren't any of the traditional fair housing issues in Livonia. The City, according to this person, is becoming more diverse. More individuals of different races and ethnicities are residents, even since the 2000 Census occurred. The same can be said of Redford Township. That stakeholder, however, noted a continuing perception among non-residents that Livonia is an exclusive and does not welcome minorities.

Impediment to Fair Housing #1: Public Perception of Exclusivity

If the above view is true, the perception could become the reality. It was suggested that the communities counter this perception through an educational campaign. This perception, however, could change simply as more minority households take up residence.

Special Needs and Homeless Characteristics

Neither Redford Township nor Livonia has large numbers of homeless people, although some homeless are found in both communities from time to time. Given the imprecise nature of homeless data, the estimated needs varied significantly between the two communities, and the data was revisited during the development of this Analysis. The data used were derived from the State of Michigan's Continuum of Care Gaps Analysis Chart, updated for the 2003 Consolidated Plan Annual Action Plan. Therefore both believe that the estimates provided in Table 6 below reflect this condition as accurately

³ Minority concentration as defined in this study.

as possible. Table 6 also considers the needs of the special homeless populations identified below.

**Table 6
Homeless Special Needs Populations**

CATEGORY	LIVONIA	REDFORD
	Individual	Individual
Total # Homeless Individuals	14	7
Homeless Families w/Children	4	2
Chronically Homeless	7	4
Seriously Mentally Ill	5	2
Chronic Substance Abuse	7	3
Veterans	3	1
Persons w/HIV/AIDS	2	1
Victims of Domestic Violence	5	3
Youth	2	1

Source: Table 1A 2003 State of Michigan Consolidated Plan Action Plan⁴ 10/03

It should be noted that there are a number of group homes serving various special needs populations to be found in each of the AI jurisdictions. All have been successfully integrated into the neighborhoods they are located in.

Housing and Housing Market Characteristics

Housing follows people and one, given the demographic trends, it follows that the housing market in the study area is strong in both communities, and is projected to be strong, for the foreseeable future.

Housing in Livonia and Redford Township is primarily comprised of single-family detached units, averaging 1,200 sf in Livonia and 1,000 sf in Redford Township. Much of the housing is older, especially in Redford Township and in the eastern portion of Livonia, having been constructed in the 1940's – 1970's. Those homes are reaching the point where major repairs need to be made.

A further look at these considerations is therefore in order. In Redford Township roughly 85% of all single family homes were constructed before 1960 and these units reflect the size and configuration patterns characteristic of that era. Fully one quarter of them are now over 50 years old. Livonia, on the other hand, has a many dwellings constructed during 1950's – 1970's, its prime development period. Other units, however, were developed as late as the 1990's. Livonia's housing stock, therefore reflects a variety of structural types, sizes and amenities. Ages of the structures in both communities are found in Table 7, which follows on the next page.

As the table shows, the median age of owner housing is now 50 and 42 years, respectively, for Redford Township and Livonia. The ramifications are explored below.

- Many original owners have either retired, or are nearing retirement. Their homes offer a potential supply of affordable housing for starting and first-time homebuyer

⁴ The data from the State's Table 1A was extrapolated down to the municipal level by dividing the gross numbers identified across the State, by each municipality's share of the State's population. This allowed for a more consistent approximation of need for both jurisdictions.