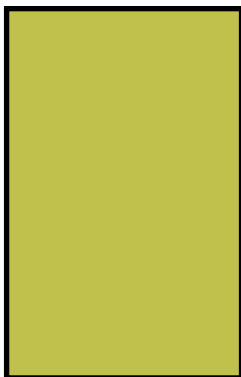


City of Battle Creek 2024 Annual Action Plan (Draft)



Contents

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	3
PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)	10
AP-10 Consultation - 91.100, 91.200(b), 91.215(l)	11
AP-12 Citizen Participation	18
AP-15 Expected Resources – 91.220(c)(1,2)	20
AP-20 Annual Goals and Objectives.....	24
AP-35 Projects – 91.220(d)	28
AP-38 Project Summary	29
AP-50 Geographic Distribution – 91.220(f).....	38
AP-55 Affordable Housing – 91.220(g)	40
AP-60 Public Housing – 91.220(h).....	41
AP-65 Homeless and Other Special Needs Activities – 91.220(i)	42
AP-75 Barriers to affordable housing – 91.220(j)	47
AP-85 Other Actions – 91.220(k)	50
AP-90 Program Specific Requirements – 91.220(l)(1,2,4)	53

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

1. Introduction

The City of Battle Creek's Community Development Division supports neighborhoods by administering federal, state, and local grant programs and coordinating planning around community development efforts within the City. It administers the federal Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) formula grant programs. It is also responsible for administering the HUD funded Lead Hazard Control Program, the Lead Safe Program funded by the Michigan Department of Health and Human Services (MDHHS), and the BCPS Teacher Housing Incentive Program funded by the W.K. Kellogg Foundation. Every five years the City of Battle Creek coordinates a community-wide planning and needs assessment process to develop a five-year Consolidated Plan which governs the spending of these federal funds.

The Consolidated Plan calls for a community-wide planning process to identify needs and create a plan to address them. It includes consulting with individuals and organizations in both the private and public sectors. It involves the collection and analysis of data concerning the needs of households, as well as the market conditions that shape where we live, work, and play. The result is a plan that accounts for community development-related activities throughout the city, sets measurable goals for meeting specific community needs, and gives direction for how City-administered federal dollars will be spent.

For each year of the five-year plan, the City prepares an Annual Action Plan, which updates priorities; details one-year goals and outcomes; and explains how funds will be allocated to achieve local goals. Other federal funds provided through the U.S. Department of Housing and Urban Development (HUD), not administered by the City of Battle Creek, but included in the planning process, include Continuum of Care Homeless Assistance, and public and assisted housing provided by the Battle Creek Housing Commission.

2. Summary of the objectives and outcomes identified in the Plan

The goal of the City's Five Year Consolidated Plan is to ensure safe, prosperous, and equitable communities by creating strong, sustainable, and inclusive neighborhoods and quality affordable homes for all people of Battle Creek. To achieve this goal, the 2020-2024 Consolidated Plan has six strategic priorities. This is the last year of the current plan, the City will lead a planning process to develop a new Consolidated Plan during the upcoming program year, 7/1/2024-6/30/2025. Existing goals are:

Local Priority 1: Ensure Housing is Affordable, Accessible, and Safe

Communities are stronger when people have access to quality affordable and safe housing. This priority encompasses preserving current affordable housing, developing new units, increasing the diversity of housing options, and ensuring that low and moderate-income neighborhoods benefit from housing resources and that rental housing is safe.

Local Priority 2: Activate Underutilized Land in Low-Income Neighborhoods

The City will encourage the activation of public, vacant, and/or underutilized land in low income areas, consistent with the City's master plan. Activation of these spaces enables communities to preserve natural resources for public use; promote higher densities and a wider range of land uses around downtown and major corridors; assemble property for larger-scale developments and improve connectivity between neighborhoods and the downtown.

Local Priority 3: Alleviate Poverty

Individuals and families can be said to be in poverty if they have resources far below those of an average individual or family and if the impact is that they are essentially excluded from ordinary patterns, customs, activities, or quality of life. This priority encompasses strategies that raise income, reduce the impact of being low-income, and break up concentrated poverty.

Local Priority 4: Community Engagement through Collaboration and Empowerment

This priority promotes engagement and empowerment at all levels of the community. Empowerment refers to the process by which people gain control over the factors and decisions that shape their lives. To that end, this priority emphasizes projects that promote ownership, create or clarify pathways for community members to access and utilize resources; and/or engage them in community decision-making processes.

Other objectives in this priority promote organizing at the institutional and organizational level to create a sense of shared purpose, increase capacity, coordinate planning, partner across sectors, and build coalitions.

Local Priority 5: Affirmatively Further Fair Housing

Fair housing is the right to choose housing free from unlawful discrimination. Federal, state, and local fair housing laws protect people from discrimination in housing transactions such as rentals, sales, lending, and insurance. When accepting grant funds from HUD, the City agrees to use the funds affirmatively further fair housing.

Local Priority 6: Restore Vitality in Low-Income Neighborhoods

Vibrant and strong neighborhoods make a strong city. They possess a sense of place and a feeling of safety and familiarity. Houses are occupied and well-maintained and public spaces are inviting, walkable, and lively. Strategies and projects that successfully address this priority create, facilitate, ensure, or enhance these conditions.

3. Evaluation of past performance

In the 2022-2023 Program Year the City CDBG and HOME programs funded code enforcement, CDBG administration and neighborhood planning, minor home repair, homeowner rehabilitation, acquisition/development/resale for one property, and tenant-based rental assistance. Most of these activities were targeted in CDBG low- and moderate-income target areas. Some Minor Home Repair projects occurred in other areas of the City but all households assisted were at or below 80% of the area median income.

Special CDBG-CV funds, allocated to the City via the CARES Act, were used to fund rental assistance, housing case management, and eviction diversion. CDBG-CV funds were received in 2020, mostly used in 2020 and 2021 to fund nonprofit organizations work to address increases in homelessness and the need for people experiencing homelessness to socially distance during the COVID pandemic. CDBG-CV funds were fully expended by March 2024.

The following information shows how activity outcomes from the most recently completed program year align with the strategic priorities of the City's Consolidated Plan:

CDBG Corona Virus Emergency Funding responding to an increase in homelessness and to social distance during the COVID Pandemic		
Type of Assistance Funded/Nonprofit Agency	Amount	Dates of Service, Number served
Emergency Hotel Vouchers (SAFE PLACE)	\$ 20,000.00	4/2020-6/2021, 285 domestic violence survivors housed in hotels; safe, socially distanced shelter
Eviction Diversion (Legal Services)	\$ 20,000.00	7/2020-12/2020, 85 persons assisted
Housing Case Management (Summit Pointe)	\$ 21,708.00	10/2020-9/2021, housing information and referrals for 44 households
Housing Case Management (NIBC)	\$ 38,292.00	1/2022-6/2023, housing information and referrals for 52 households
Utility Assistance (Community Action)	\$ 56,313.72	7/2020-12/2020, utility assistance assisted 46 households
Housing-related Interpretation and Advocacy (VOCES)	\$ 59,491.63	7/2020-4/2021, served 85 people (78 Spanish-speaking)
Emergency Homeless Shelter (The SHARE Center)	\$ 62,885.97	10/2020-3/2021, funding to operate Full Blast as a homeless shelter, 349 people assisted
CDBG-CV: City of Battle Creek General Admin.	\$ 142,404.31	1/2020-12/2024, City Administration to plan and administer funding
Rental Assistance (Summit Pointe)	\$ 148,711.73	6/2020-3/2021, rental assistance for 44 households
Homeless Shelter (Battle Creek Shelter)	\$ 200,000.00	1/2022-5/2022, expanded hours at a new shelter, 451 people assisted
Rental Assistance (Neighborhoods, Inc., new HARA)	\$ 235,168.64	1/2022-1/2024, three months of rental assistance plus security deposits and utility deposits, 71 households assisted
Total CDBG-CV Funds Spent	\$ 1,004,976.00	

Local Priority 1: Ensure Housing is Affordable, Accessible, and Safe

- The City's Minor Home Repair program completed 28 projects for low- and moderate-income homeowners.
- The City's Lead Safe Programs completed lead abatement of 29 residential units.
- Code Compliance completed 601 rental property inspections within CDBG target areas.
- Identified City-owned land for a private developer of permanent supportive housing, Upholding, to apply for Low-Income Housing Tax Credits (LIHTC) for 55 units of one-bedroom apartments. Committed \$360,000 of HOME-ARP funds to this development. Funding announcements will be made in the spring of 2024 to see if the project will move forward.

Local Priority 2: Activate Underutilized Land in Low-Income Neighborhoods

Calhoun County Land Bank Authority (CCLBA) continued efforts to support the community garden at Fremont/McKinley Revitalization Area, with plans to install a hydrant at Fremont Gardens. The First Congregational Church has partnered on this project and will continue to pay for the service once installation is completed. The garden will serve and be available to Fremont/McKinley neighborhood members.

CCLBA continued to be engaged in Post/Franklin (NPC1) and Central BC (NPC3) and attended meetings with discussion of the land reuse strategy of vacant properties in these areas. These will be addressed by CCLBA in the future with community engagement. Staff also plans to replace the pop-up selfie station murals in time for this summer's Color the Creek festival.

CCLBA has continued and progressed work in the Northcentral (NPC 2) area also known as the Washington Heights Neighborhood (WHN) with their Advisory Committee (AC). The AC worked diligently in 2023 to decide the disposition of 167 or 257 properties that are owned the CCLBA. The end use of the properties activated land for development, side lots to adjacent owners, beautification, and other uses of the properties in the community.

Local Priority 3: Alleviate Poverty

- The Battle Creek Shelter expanded shelter hours to provide safe and socially distanced indoor space during evening and weekends where consistent shelter hours were not available prior to COVID-19 resulting in the provision of shelter for 283 individuals.
- Voces provided housing advocacy and interpretation services to 52 Hispanic and Latino families to help them access resources.
- HOME funded Tenant Based Rental Assistance (TBRA) provided through Neighborhoods, Inc. of Battle Creek
- Legal Services Eviction Diversion program.

Local Priority 4: Community Engagement through Collaboration and Empowerment

- City staff serve as members of the “Beyond Separation” Design Team of the Truth, Racial Healing, and Transformation (TRHT) Initiative. TRHT is a community-wide collaborative initiative funded by the W.K. Kellogg Foundation focused on creating a racial equity movement in Battle Creek. The Beyond Separation team is focused on housing and addressing segregation and is comprised of representatives from the City, the Battle Creek Area Association of Realtors, the Fair Housing Center of Southwest Michigan, the Urban League, and community members.
- City staff continue to serve on the Battle Creek Homeless Coalition, as well as the Housing Solutions and Human Relations Boards.

Local Priority 5: Affirmatively Further Fair Housing

Fair housing is the right to choose housing free from unlawful discrimination. Federal, state and local fair housing laws protect people from discrimination in housing transactions such as rentals, sales, lending, and insurance. When accepting grant funds from HUD, the City agrees to use the funds affirmatively further fair housing.

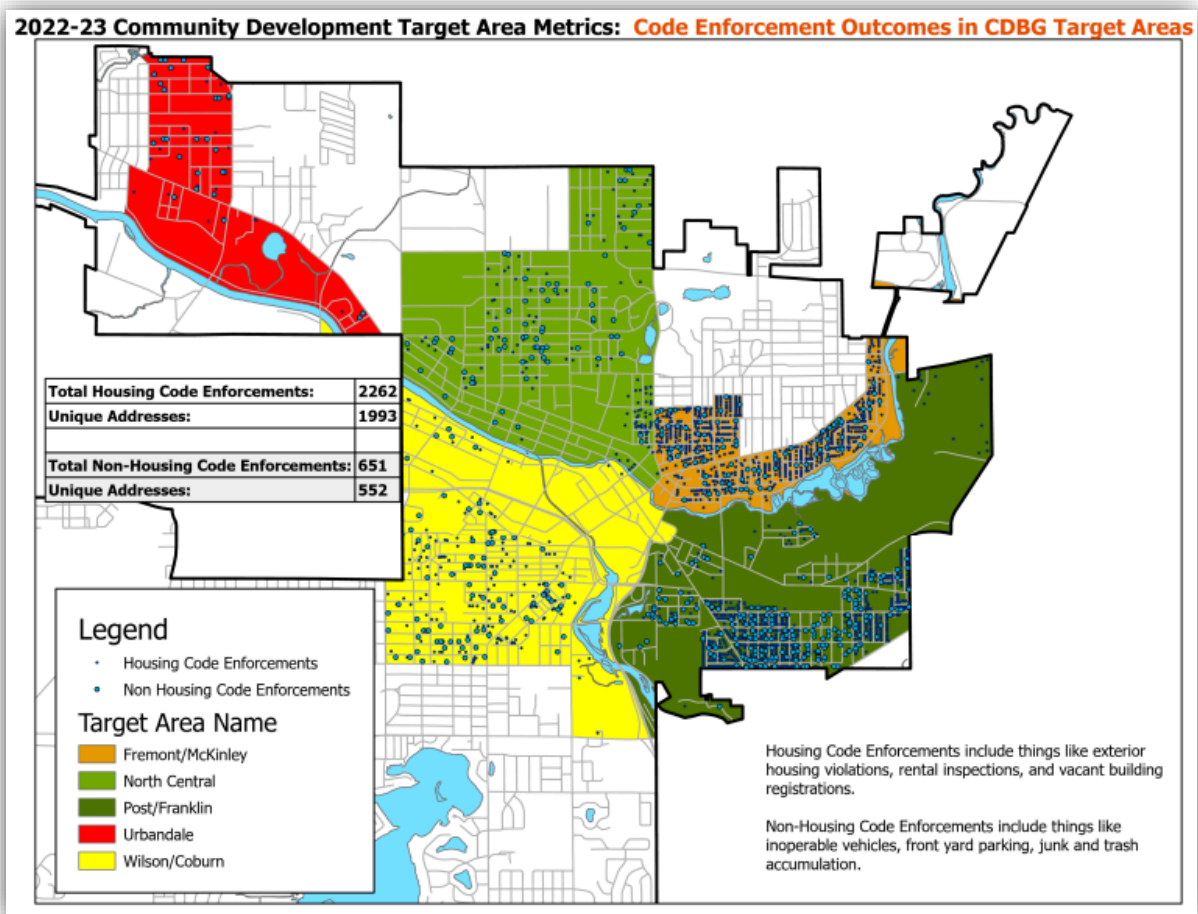
- The City is in negotiations with the Fair Housing Center of Southwest Michigan on a new contract for \$75,000 from CDBG funds reserved in 2021, 2022 and 2023 for fair housing trainings and to test the real estate and rental housing markets following up on previous testing conducted in 2015 and 2018.
- Subrecipient of CDBG and HOME funding will continue to use the Affirmation Marketing Report created by the Truth, Racial Healing, and Transformation (TRHT) in October 2020 for implementing outreach to underserved groups of people in the City.
- Based on findings of the Affirmative Marketing Report, the City funded a position at VOCES to provide housing case management for Spanish speaking individuals and families affected by the COVID pandemic. This is an ongoing public services grant funded by the CDBG program.
- The City completed an internal Equity Audit in 2021, which led to the hiring of the City's first Diversity, Equity and Inclusion Officer in the fall of 2023. This officer will be consulting with Community Development on its fair housing strategy.
- Community Development employs three bilingual Spanish speaking staff that are trained interpreters to provide better service and outreach to the Hispanic and Latino community.
- Increased Hispanic/Latino participation in Community Development housing programs. Over the past ten years, between one and three percent of Minor Home Repair resources have gone towards assisting Hispanic and Latino clients, depending on the year. Because Hispanic and Latino families make up 8.1% of the Battle Creek population, they have been considered underserved. Last year 11% of Minor Home Repair resources were used in projects benefiting Hispanic or Latino clients.

Local Priority 6: Restore Vitality in Low Income Neighborhoods

- Calhoun County Land Bank Authority's (CCLBA) concentrated work in the Northcentral (NPC 2) area with W.K. Kellogg Foundation funding continues to be driven by the community engagement of the Washington Heights Neighborhood Advisory Committee. CCLBA staff with this 14-member group of residents, property, and business owners, elected official and community leaders has had success in providing a platform for citizens to engage in the use of the property that is vacant in their neighborhood. This engaged group has promoted community forums and involved stakeholder including the Battle Creek Area Habitat for Humanity, and many City divisions including Community Development, the Historic District Commission, Code Compliance and Planning and Zoning. CCLBA has a memorandum of understanding with Washington Heights United Methodist Church for a future housing development on CCLBA property and formerly City of Battle Creek owned parcels. Work has

been done to clear titles and conduct predevelopment work to prepare to build in-fill housing.

- In addition, with funding from the W.K. Kellogg Foundation, the CCLBA is now able to provide clear title on properties being sold through its Side Lot Program and help owners combine the new lot with their existing home so long as there are no other barriers like an existing mortgage. The pilot program provides the new owner with clear title, and when possible, a combined property resulting in a better asset and investment. This is helping neighbors solve problems like shared driveways and to add to their property. This effort help return publicly owned land back to individual homeowners who then can mow and maintain the property.
- CCLBA also made investments in a handful of houses in its portfolio to return them to productive use so that they can be sold affordably to homeowners who then can start paying taxes on these properties. Code compliance completed 2,262 enforcements in CDBG target areas to address health and safety issues
- Code Compliance completed 66 new vacant building enforcements and issued 87 citations to secure vacant buildings that were previously identified.



4. Summary of citizen participation process and consultation process

The City had substantial citizen participation in the creation of its 2020 Consolidated Plan, including more than 20 consultations with community leaders, 950 responses to a community survey, and 9 public meetings to gather public input. The Community Development Supervisor has participated in meetings with all six NPCs as a component of the Citizen Participation and consultation initiative.

As part of the citizen participation process, staff from Community Development attend meetings to discuss housing and community development needs with members of the six Neighborhood Planning Councils in January – April 2024. A public hearing on housing and community development needs was held at the April 16, 2024 City Commission meeting. The invitation to the public hearing was published in the SHOPPER News and the Spanish language newspaper, Nueva Opinion two weeks before this hearing. The Community Development Supervisors phone number and email was listed in the public notice for receiving comments. Listed in the public notice was how accommodations for disabilities and interpretation could be arranged.

A draft proposed 2024 Use of Funds and Annual Action Plan was published to the City's webpage on April 4, 2024 to start a 30 day public comment period which will end at the scheduled public hearing at the May 7, 2024, City Commission meeting.

5. Summary of public comments

As public comments are received they will be summarized.

The following comments were received through Neighborhood Planning Councils:

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

All comments and views expressed in the consultations, public survey, public meetings and public hearings were accepted.

7. Summary

All proposed activities and budgets are published in the weekly local free distribution newspaper, and bi-weekly Spanish-language newspaper. The City of Battle Creek is editing its Citizen Participation Plan in the spring of 2024 to hold three annual public hears about federal community development funding. The first public hearing is held in the fall of each year to solicit citizen input on Battle Creek's Consolidated Annual Performance and Evaluation Report (CAPER). Then, in the late winter/early spring a second public hearing is held on housing and community development needs. A third public hearing is held in the spring to obtain citizen comments and review of the proposed budget and use of funds in the Annual Action Plan or the Consolidated Plan every five years.

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

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

The City of Battle Creek is an entitlement grantee for Community Development Block Grant (CDBG) and HOME Investment Partnership funds. Battle Creek is located in southwest Michigan, approximately 115 miles west of Detroit and 160 miles northeast of Chicago. It is the largest city in Calhoun County, encompassing an area of 44 square miles, with a current estimated population of 52,123. (American Communities Survey, 2022).

The administration of federal community development funding is conducted by the Community Development Division which is part of the Community Services Department comprised of Inspections, Planning, Code Compliance, and Community Development. The Community Development Division is staffed with a Supervisor, a Housing Rehabilitation Coordinator, a Lead Inspector, a Lead Grant Coordinator, two Community Development Specialist, a Construction Specialist, and an Intake Specialist. The Community Development Supervisor reports to the Director of Community Services who reports to the Assistant City Manager.

The city has operated under the commission-manager form of government since 1961. Policymaking and legislative authorities are vested in the City Commission, which is comprised of nine members, including the mayor. The governing council is responsible, among other things, for passing ordinances and resolutions, making public policy decisions, adopting the budget, appointing boards, commissions, and committees, approving contracts, authorizing real estate transactions, awarding bids, selling property, and hiring the government's manager and attorney. The City Manager is the chief administrative officer of the City and is appointed by and serves at the pleasure of the City Commission. The City Manager is responsible for carrying out the policies and ordinances of the City Commission, overseeing the day-to-day operations of the government and appointing the government's department heads.

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

Agency Role	Name	Department/Agency
CDBG Administrator	BATTLE CREEK	City of Battle Creek Community Development
HOME Administrator	BATTLE CREEK	City of Battle Creek Community Development

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

Helen Guzzo

Supervisor

Community Development, City of Battle Creek City Hall, 10 N.

Division Street, Suite 114 Battle Creek, MI 49014

269-966-3315

hhguzzo@battlecreekmi.gov

Website: www.battlecreekmi.gov/181

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

During the past program year, Community Development staff played a leadership role in efforts to elevate and address housing concerns in the community, increase awareness of the risks of poisoning from lead paint, and further the work of Homeless Coalition. This work involved both informal and formal consultations with dozens of community organizations and is integral to achieving the ambitious goals of the 2020-24 Consolidated Plan. Evidence of this can be seen in the many new and growing collaborative groups in the last couple years including; Truth, Racial Healing, and Transformation, the authors of the City's CDBG-CV Affirmative Marketing plan; the Battle Creek Area Association of REALTORS Committee for Diversity and Inclusion (CDI) which focuses on building equitable pathways to homeownership for people of color, creating a more diverse association and leadership to better serve the Battle Creek community and advocating for and promoting fair housing among members and in the community. This committee was formed because of the Fair Housing investigations into discrimination in the real estate market that was funded by Community Development in 2015 and 2018.

Consultations conducted for the 2024-25 Annual Action Plan

Affordable Housing

Habitat for Humanity

Habitat runs a Re-store storefront that recycles building materials, providing them at low cost to Battle Creek residents and providing a source of funding for projects. Habitat has been specializing in building handicapped ramps in partnership with Community Action. Habitat has responded to changes in the housing market with the limited supply of housing available, Habitat rehabilitating vacant houses purchased from the Calhoun County Land Bank to constructing modest newly built homes. They will soon complete the first new build that they have stick-built in 15 years. Habitat also builds ramps for people in need and conducts some exterior minor home repair work.

Community Action Agency of Southcentral Michigan

Community Action is a key partner in the City's work around lead abatement for both state-funded and HUD-funded lead remediation. In Battle Creek, it runs Head Start, Early Head Start, a Foster Grandparent program, and Emergency Food Assistance and Commodity Supplemental Food programs. Community Action also administers utility assistance and weatherization. CA provides 3,000 rides per month for seniors and the disabled. Transportation is still the number one need of parents participating in Head Start and is a big need in Battle Creek. The City and Community Action regularly coordinate minor home repair services. Community Action and Community Development staff meet regularly on issues surrounding lead in housing and supportive services.

Neighborhoods, Inc. of Battle Creek

The City continues to meet monthly with Neighborhoods, Inc. regarding housing needs. City staff meet regularly with Neighborhoods, Inc. to discuss program progress and emerging needs. Neighborhoods, Inc.'s homeless housing program is funded by the HUD Continuum of Care; NIBC serves at the Housing Access Resource Agency (HARA) for the Battle Creek Continuum of Care. They use a Housing First model as much as possible in a limited resource environment. NIBC receives HOME Tenant-Based Rental Assistance (TBRA) funds for the purpose of providing rent assistance and housing case management.

Education

New Level Sports

New Level Sports Ministries is a Non-profit Student Athlete Support Service, for ages 8 – 18. New Level Sports assists student-athletes to develop purpose-driven lives through participation in educational enrichment, personal growth, and physical development activities. New Level Sports is also the lead agency behind the development of the Youth Village, a multigenerational, mixed-use neighborhood development in the Washington Heights neighborhood. Community Development staff consulted with New Level on multiple

occasions during the winter of 2022-23, discussion covered the planning and pre-development phases of the Youth Village Learning Center and New Level's work to create a CDC organization to oversee community engagement and development work.

Homelessness

Homeless Coalition

Community Development staff attended Homeless Coalition meetings throughout the year. Staff keep the coalition apprised of the City's Annual Action Plan process and receive updates from area agencies regarding current trends. The Homeless Coalition is a sub-group of the Housing Solutions Board. Members of the Homeless Coalition span a variety of partners who serve the homeless population with wide-ranging services. Community needs are a regular topic of conversation at coalition meetings.

SHARE Center

The SHARE Center is a drop-in day program for homeless people. It offers services for those who are ready to make positive life changes and offers peer support specialists to provide services. SHARE Center is the primary meal provider for the community at large. Consultation with the SHARE Center Executive Director focused on priority needs including having Permanent Supportive Housing (PSH) in the city, a shelter option for youth and families, and a program that covers background checks to help with tenant application costs. SHARE Center was one of the ARPA recipients in the city of Battle Creek. The ARPA funds are covering the installation of new showers and additional office space for case managers focused on employment and family case management as well as a new recovery coach. The case managers and recovery coach will be covered by the HOME-ARP grant SHARE Center received from Community Development.

Gracious Homes

Gracious Homes, Inc. was founded in 2003 and they focus on transitional housing for women providing them with up to 120 days of structured support services that include therapy, counseling, education, and healing from dysfunctional behaviors. Consultation with the founder and director of Gracious Homes focused on the need for more women's shelters in the city and supportive services for women such as safe, affordable housing and employment opportunities for women without a high school diploma or college degree.

Haven of Rest Ministries

Haven of Rest Ministries has served the Battle Creek community since 1956. They are a key stakeholder among

homeless service providers. Consultation with the Haven of Rest Executive Director focused on the need for providing recovery programs to the residents of the Haven as well as case management services to assist in finding and maintaining housing. The Haven of Rest received HOME-ARP funds from Community Development to continue to offer case management services and the Men's and Women's Life Recovery Programs.

Battle Creek Shelter

The Battle Creek Shelter is a barrier-free homeless shelter in Battle Creek. Opened in late 2020, the shelter is one of only a few low-barrier shelters in the state. The City provided HOME-ARP funding to BC Shelter to support a second case manager. Consultation with shelter staff focused on the need for more shelter space for women and children, hotel vouchers, and transit vouchers.

Public Housing

Housing Solutions Board

The Housing Solutions Board is the Calhoun County Homeless Coalition's executive board and represents the broad interests of all stakeholders whose goal is to create self-sufficient individuals and families. Community Development staff are represented on the board, as are local government representatives from Calhoun County, Albion, and Springfield.

Supportive Services

Legal Services

Legal Services provides the only free legal services in the county. Legal Services prioritizes cases for homelessness prevention, victims of domestic violence, seniors, and loss of benefits. Community Development staff consulted Legal Services about best practices for eviction diversion and continued partnership.

Special Populations

Truth, Racial Health, and Transformation

TRHT's work related to housing and community development is focused on closing the 20% homeownership rate gap between whites and people of color in Battle Creek through advocacy, creation, and dissemination of a homebuyer guide, and homebuyer workshops to African American and Hispanic/Latino homebuyers.

VOCES

VOCES is a community center for Latino/Hispanic families to link to opportunities and engage the community. VOCES provides English language classes, access to GED training and testing, and provides translation services. Community Development staff consulted VOCES to discuss barriers to accessing housing resources during the pandemic. There is a need for continued awareness of available housing resources among the Hispanic and Latino populations. VOCES received a CDBG-funded case management grant to help bring awareness to this population. That position will continue to be funded through the end of 2024. There has been a significant increase in Hispanic/Latino applicants across many housing programs including Community Development's Minor Home Repair and Lead Safe programs.

Uwezo Swahili Community

The Uwezo Swahili Community organization provides support to Swahili newcomers to Battle Creek to help them thrive in the city. They help newcomers escape poverty teach them to live American values and create a strong foundation of their own. Consultation with the founder of the organization focused on the needs of the Uwezo Swahili community for establishing employment first, then focusing on health, and then translation and transportation services.

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

The City of Battle Creek participates in a number of collaborative relationships that enhance coordination between housing and service organizations. Collaborative work includes support to Neighborhood Planning Councils, the Greater Battle Creek Homeless Coalition, the Calhoun County Lead Task Force, TRHT (Truth, Racial Healing, & Transformation). The Calhoun County Land Bank Authority is a key partner in efforts to address vacant buildings, maintenance on vacant properties and other efforts to improve neighborhood conditions.

Neighborhood Planning Councils (NPCs) are six resident groups representing different geographic areas of Battle Creek. NPCs provide a forum for residents, City staff and City Commissioners to discuss neighborhood concerns. The City educates members about City programs and pending decisions, opportunities or changes. NPCs decide which recommendations or strategies they would like to develop. Meetings are open to all and take place once a month. While NPC meetings were suspended due to the pandemic, six of the eight NPCs decided to resume meetings as of the 2024 calendar year.

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

The Greater Battle Creek Homeless Coalition is the Continuum of Care coordinating body for the City of Battle Creek and Calhoun County. It is a community collaboration with an executive board, the Housing Solutions Board, which manages HMIS and funding applications. Staff from the City's Community Development Department participates in the Homeless Coalition attending monthly meetings and serve on the Housing Solutions Board.

Working together members of the Homeless Coalition address the needs of homeless persons and persons at risk of homelessness. The inventory of homeless services and facilities described in MA-30 Homeless Facilities details the array of services that are provided to help prevent homelessness and to help people recover from a housing crisis.

City staff have been particularly engaged with the Continuum of Care during the pandemic. Just over \$1 million of CDBG-CV CARES Act and HOME TBRA funds were sub-granted to CoC agencies for the purpose of providing rent assistance, utility assistance, housing case management, eviction diversion, and translation services. The city hired Truth, Racial Healing, and Transformation (TRHT) of Battle Creek to create an affirmative marketing plan for CDBG-CV grantees. This plan identified populations least likely to access resources during the pandemic, barriers to access, and proposed strategies to address them. This resulted in the creation of a racial equity task force made up of people-of-color-led community organizations, a marketing campaign targeted at the African American, Hispanic/Latino, and Burmese populations, and the creation of a part-time interpreter/housing advocate position to help families connect with resources.

Staff worked with the Homeless Coalition and its executive board, the Housing Solutions Board, to create a strategic value scorecard using the Homeless Coalition strategic plan. The scorecard uses the Allowance planning process (the same process used to create the City's Consolidated Plan) to create a weighted matrix to assess the strategic value of project ideas. The scorecard was used by the City to develop its HOME-ARP allocation plan and evaluate the impact of proposed projects on the Homeless Coalition goals. The exercise also created an opportunity for the Coalition to educate new members about its plan, make some updates and prioritize goals. Six HOME-ARP sub-recipient grants have been awarded using the scorecard. Here are the funding awards:

2021 HOME-ARP

Battle Creek Shelter/Battle Creek Community Foundation - Housing Case Management	\$ 42,000.00
Gracious Homes-Supportive Services	\$ 52,000.00
Drop-In, Self Help dba The SHARE Center - Outreach and Transportation/Supportive Services	\$ 111,090.00
Neighborhoods, Inc. Case Management/Outreach Services	\$ 147,000.00
City of Battle Creek HOME-ARP Admin and Planning	\$ 164,153.70
Haven Supportive Services	\$ 252,000.00
Permanent Supportive Housing - Upholdings	<u>\$ 326,114.30</u>

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

Battle Creek receives Emergency Solutions Grants (ESG) funding through MSHDA and its balance of state program for ESG non-entitlement jurisdictions. The Housing Solutions Board (HSB), part of the Battle Creek Homeless Coalition, runs the application process for ESG funding and for HUD Continuum of Care homeless assistance funding.

Throughout the year, Community Development staff met with numerous representatives of the Homeless Coalition to discuss their priorities and alignment with the Annual Action Plan. The consultations focused on permanent supportive housing, facilities improvements, overcoming housing access barriers, eviction diversion, increased need for rent and utility as and providing ongoing case management and other supportive services to the homeless were listed as priorities.

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

City staff are planning consultations with nearby local governments of Albion and Springfield, but were unable to complete the consultations before completion of the Annual Action Plan. Both municipalities are engaged in their own community development efforts and have expressed an interest in meeting in the near future to discuss common issues and community needs more generally.

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

The City of Battle Creek regularly works in partnership with county, state and federal agencies on initiatives related to community development goals. The Calhoun County Health Department coordinates home visits to households with lead poisoned children with City lead abatement programs. The Calhoun County Land Bank Authority continues to partner on efforts to develop new infill housing models, and land use planning that puts city and county owned vacant land back into productive use. The City works with the Michigan State Housing Development Authority (MSHDA) and the Michigan Department of Housing and Human Services (MDHHS) on implementing lead abatement programs, neighborhood empowerment grants to local agencies, and larger housing and community development planning efforts.

AP-12 Citizen Participation

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

The citizen participation process for the creation of the 2024-2025 Annual Action Plan included consultations with community stakeholders and three public hearings. The purpose of the citizen engagement was to obtain citizens' views, respond to proposals, address questions, and provide important program information. Information gathered added to what was learned during the preparation of the City's 2020-2024 Consolidated Plan, which included over 50 consultations, 10 public meetings, and a community survey which resulted in 950 responses.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Comments not accepted	URL (If applicable)
1	Newspaper Ad	Non-targeted/ broad community	Newspaper public notices, 8/10/2023, in the SHOPPER NEWS and the Nueva Opinion for the 2022 CAPER, publicizing the 9/5/2023 City Commission Public Hearing on the CAPER.	No comments received.	None.	https://irp.cdn-website.com/3426e64a/files/uploaded/Shopper%2008-10-2023.PDF
	Public Hearing	Non-targeted/ broad community	Public Hearing on the CAPER at a regular City Commission meeting, 9/5/2023.	No comments received.	None.	https://battlecreek.novusagenda.com/agendapublic/MeetingView.aspx?MeetingID=632&MinutesMeetingID=980&doctype=Agenda
3	Newspaper Ad	Non-targeted/ broad community	Public Notice of 4/16/2024, Public Hearing on community needs in the Shopper and Nueva Opinion, on 4/4/2024 and 3/29/2024.		None.	pending

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Comments not accepted	URL (If applicable)
4	Public Hearing	Non-targeted/ broad community	Public hearing on housing and community development needs at a regular City Commission meeting on 4/16/2024.	No comments received.	None.	pending
5	Newspaper Ad	Minorities Non-targeted/ broad community	Notice of 2023-24 Proposed CDBG and HOME budget and the 5/7/2024 Public Hearing on proposed budget and 2022-23 Annual Action Plan published in the SHOPPER News, on 4/4/2024 and 4/18/2024; and the Spanish-language, New Opinion on 4/11/2024.	No comments received.	None	pending
6	Public Hearing	Non-targeted/ broad community	5/7/2024 Public hearing on the proposed 2024 CDBG and HOME budget and 2024 Annual Action Plan at a regular City Commission meeting.	No comments received.	.None	https://battlecreek.novusagenda.com/agendapublic/DisplayAgendaPDF.aspx?MinutesMeetingID=853

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

The City of Battle Creek's Community Development Department administers the federal Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) formula grant programs. Other federal funds provided through the U.S. Department of Housing and Urban Development (HUD), not administered by the City of Battle Creek but considered in the creation of the Consolidated Plan, include Continuum of Care Homeless Assistance which provides funds to the Haven of Rest, S.A.F.E. Place and Summit Pointe's housing and homeless programs; and public housing and rental vouchers provided through the Battle Creek Housing Commission. The Battle Creek Housing Commission in partnership with the VA Medical Center, located in the Fort Custer area of Battle Creek, jointly administer HUD-VASH Housing Choice vouchers.

Anticipated Federal Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available			Remainder of Con Plan	Narrative Description
			Annual Allocation:	Prior Year Resources:	Total:		
CDBG	Federal	Acquisition, Admin and Planning, Housing, Public Improvements, Public Services	\$1,200,000 Estimated	\$0	\$1,200,000	0	CDBG funds program delivery costs, code compliance, minor home repair, public service grants, facility improvements, curb cuts and transit stops, rental rehabilitation.
HOME	Federal	Acquisition, Homebuyer assistance, New construction for ownership, TBRA	\$320,0000 Estimated	\$0	\$320,000	0	
							HOME funds major rehabilitation of homes for homeowners, homebuyers. Sub-recipients conduct activities under contract with the City.

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

When it established the HOME Investment Partnership Program, Congress intended to establish a partnership between the federal government, states, units of local government and nonprofit organizations to expand the supply of affordable housing for low-income families. According to 24 CFR §92.218, contributions must be made to qualified housing in an amount equal to 25% of appropriated HOME funds drawn down for housing projects. These contributions are referred to as match. To be considered eligible match, a contribution must be made from nonfederal sources and must be made to housing that is assisted to meet HOME program requirements.

In many program years, because of its higher poverty rate, Battle Creek has qualified as a distressed community by Congress and has had its HOME match requirement reduced 50% from 25% to 12.5%, or waived totally. The City of Battle Creek has been able to “bank” excess match documented in previous program years so it currently carries a significant surplus. Match is documented and recorded as it is earned.

The City isn’t relying on 2023 HOME activities to generate match because of the carried surplus. If additional match is generated in 2023 it will likely be in the form of volunteer hours contributed through the Infill Housing Program.

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

The Calhoun County Land Bank Authority owns the majority of vacant residential property in CDBG Revitalization Target Areas and are a key partner in the implementation of the plan.

Battle Creek Unlimited, an economic development corporation that receives Tax Increment Financing Authority (TIFA) funds, and whose board is appointed by the City Commission, purchased a closed Kmart located in a LMI neighborhood close to downtown. The Kmart was demolished and the land is being promoted for affordable housing development. An affordable housing developer is expected to apply for Low Income Housing Tax Credits in the October 2024 round for this area.

Habitat for Humanity is using vacant land purchase from the CCLBA for developing in-fill housing in the Urbandale area. HOME Community Housing Development Organization set-aside funds are proposed to fund the building of two units of affordable housing by Habitat for Humanity using 2024 HOME dollars along with funds remaining from 2018, 2020, 2021 and 2022.

Discussion

In early April 2024, The City used estimated amounts of the City's CDBG and HOME allocations to begin the citizen participation process. Public notices of the 2024 Use of Funds and Draft Annual Action Plan public hearing and comment period included the estimated amounts. When the actual amounts become available, the City will publish a use of funds in local newspapers and on its website to notify the public of the actual amounts and the uses proposed for them.

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Attainable Housing	2020	2025	Affordable Housing	Citywide, all five Revitalization Areas	Increase the diversity of housing options; Preserve and maintain existing affordable housing; Increase access to affordable housing; Promote dense, mixed use development downtown; Reduce areas of concentrated poverty; Help underserved groups access and use resources; Support efforts around homelessness prevention; Improve fair housing awareness and accountability; Improve property conditions in LMI neighborhoods	CDBG: \$550,000 HOME: \$303,787	Infill Housing: Homeowner Housing Repaired: 32 DPA: 5 TBRA Households Assisted: 90

2	Housing Code Enforcement	2020	2024	Affordable Housing Non-Housing Community Development	All five Revitalization Areas	Improve property conditions in LMI neighborhoods; Reduce the effects of low income on life quality; Preserve and maintain existing affordable housing; Ensure the safety of rental housing	CDBG: \$210,000	Household Housing Units: 2000
----------	--------------------------	------	------	--	-------------------------------	--	-----------------	-------------------------------

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Service Grants	2020	2024	Non-housing Community Development	Citywide	Increase access to affordable housing; Raise the incomes of low-income families; Reduce the effects of low income on life quality; Help underserved groups access and use resources; Support efforts around homelessness prevention; Improve fair housing awareness and accountability	CDBG: \$180,000	Persons Assisted: 320

Table 51: Goal Descriptions

1	Goal Name	Attainable Housing
	Goal Description	This goal encompasses preserving current affordable housing, developing of new units, increasing access to affordable housing, and increasing the diversity of housing options for LMI households.
2	Goal Name	Housing Code Enforcement
	Goal Description	This effort is to improve living conditions in neighborhoods and arrest decline in targeted low- and moderate-income areas due to housing code violations; abandoned inoperable vehicles; citizen complaints regarding refuse and weed control; and code issues related to rental properties.
4	Goal Name	Public Service Grants
	Goal Description	Includes public service activities that improve access to housing and transportation.

AP-35 Projects – 91.220(d)

For the 2024 Program Year, which runs from July 1, 2024 to June 30, 2025, the City of Battle Creek will allocate \$1,200,000 in CDBG funding and \$320,000 in HOME Investment Partnership funding.

With CDBG funding it will provide General Administration, Neighborhood Planning Administration, Code Enforcement in targeted low- and moderate-income areas, Housing Rehabilitation Minor Home Repair for exterior and interior repairs that do not disturb lead paint, completion funds for the early childhood development center started in 2022, housing case management, transit stop enhancements, and fair housing education. In the HOME program, the City will partner with community organizations to do new build infill housing, provide Tenant-based Rental Assistance, and assist low and moderate income homebuyers with down payment assistance.

#	Project Name
1	General Administration (CDBG)
2	Neighborhood Planning Administration
3	Code Enforcement
4	Housing Rehabilitation Minor Home Repair
5	Fair Housing Education and Case Management
6	Facility Improvement – Early Childhood Development
7	Transit Stop Enhancements
8	Housing Case Management – Eviction Diversion
9	Housing Case Management – Vulnerable Populations
10	General Administration (HOME)
11	Infill Housing
12	Tenant-Based Rental Assistance
13	Down Payment Assistance

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

The Consolidated Plan calls for a community-wide planning process to identify needs and create a plan to address them. The allocation priorities are the product of consulting with individuals and organizations in both the private and public sectors; the collection and analysis of data concerning the needs of households, as well as the market conditions that shape where we live, work, and play; and a robust community engagement process. The result is a plan that accounts for community development related activities throughout the city, sets measurable goals for meeting specific community needs, and gives direction for how City-administered federal dollars will be spent.

AP-38 Project Summary

1	Project Name	General Administration (CDBG)
	Target Area	<ul style="list-style-type: none"> • Post/Franklin Revitalization Area • North Central • Central • Northeast • Minges Brook Riverside
	Goals Supported	Attainable Housing Housing Code Enforcement Public Service Grants
	Needs Addressed	Ensure safety of rental housing Increase the diversity of housing options Preserve and maintain existing affordable housing Increase access to affordable housing Better connect LMI neighborhoods and downtown Promote dense, mixed-use development downtown Reduce the effects of low income on life quality Reduce areas of concentrated poverty Help underserved groups access and use resources Support efforts around homelessness prevention Improve fair housing awareness and accountability Improve property conditions in LMI neighborhoods
	Funding	CDBG: \$110,000
	Description	The function of this City activity is to provide the necessary staffing to develop, Implement, and monitor the overall performance of all Community Development Block Grant programs within the City. This activity is eligible under 24 CFR 570.206 and 24 CFR 570.208(a)(1).
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project ensures program compliance and delivery for code compliance (roughly 14,500 low- and moderate-income people affected), Minor Home Repair (32 households assisted), and Public Service Grants (380 low and moderate-income people affected).
	Location Description	Community Development activities are provided City wide.

	Planned Activities	The function of this City activity is to provide necessary staffing to develop, Implement, and monitor the overall performance of all Community Development Block Grant programs within the City.
2	Project Name	Neighborhood Planning Administration
	Target Area	Citywide
	Goals Supported	Attainable Housing Housing Code Enforcement Infrastructure Improvements Public Service Grants
	Needs Addressed	Support efforts around homelessness prevention Improve fair housing awareness and accountability Support citizen participation by supporting Neighborhood Planning Councils
	Funding	CDBG: \$110,000
	Description	This City function provides the necessary management to conduct specific studies related to the overall program design of the comprehensive planning process and the development of the Consolidated Plan, involving Neighborhood Planning Councils, civic organizations, individuals, and other boards, commissions, and committees.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit	There is a city-wide benefit to activities conducted under strategic planning include implementing the Consolidated Plan requirements, conducting housing and market studies, facilitating the citizen engagement process, supporting Neighborhood Planning Councils and other community initiatives, and supporting collaborative efforts to address homelessness.
	Location Description	Activities occur citywide.
	Planned Activities	Activities will include staff creation of the Annual Action Plan and CAPER report, funding dynamo metrics housing market analysis, planning for Fair Housing work, engagement with the Greater Battle Creek Homeless Coalition and its Housing Solutions Board, and other planning activities. During the PY 2024, the City will be creating its new five-year Consolidated Plan.
3	Project Name	Code Enforcement
	Target Area	<ul style="list-style-type: none"> • Post/Franklin Revitalization Area • North Central • Central • Northeast • Minges Brook Riverside

	Goals Supported	Attainable Housing Housing Code Enforcement
	Needs Addressed	Ensure the safety of rental housing Preserve and maintain existing affordable housing Reduce the effects of low income on life quality Improve property conditions in LMI neighborhoods
	Funding	CDBG: \$210,000
	Description	The purpose of this activity is to provide effective staffing for the City's Neighborhood Code Compliance Division to continue its efforts to provide the citizens of Battle Creek with effective code enforcement, and to complement other Community Development activities in blighted and distressed areas. This activity will serve to arrest a decline in targeted areas due to housing code violations, vacant and abandoned properties, citizen complaints regarding refuse and weed control and health and safety issues related to rental properties.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Area benefit is calculated as the number of low- and moderate income individuals living in the targeted areas for code compliance. The population of these areas is estimated by the U.S. Census to be 22,935 with the estimated number of low- and moderate-income people to be 14,545. It is expected 2,000 housing units will be impacted.
	Location Description	This activity will be undertaken within the five revitalization areas within the city.
4	Planned Activities	Code enforcement activities, include exterior housing and property inspections; the write up/resolution of violations of housing code, partnerships with community groups and the police department; and rental registration promotion and inspections.
	Project Name	Housing Rehabilitation Minor Home Repair
	Target Area	Citywide Post/Franklin Revitalization Area Fremont/McKinley Revitalization Area North Central Revitalization Area Wilson/Coburn Revitalization Area Urbandale Revitalization Area
	Goals Supported	Attainable Housing

	Needs Addressed	Improve property conditions in LMI neighborhoods. Preserve and maintain existing affordable housing Reduce the effects of low income on life quality
	Funding	CDBG: \$550,000
	Description	This City of Battle Creek activity will provide grants and deferred loans to homeowners for necessary repairs. The primary focus will be exterior repairs for cited code violations and health and safety issues. All work will comply with HUD and EPA regulations including those that address the treatment of lead- based paint hazards, or potential hazards, and asbestos hazards. This activity also provides necessary funding to cover subsidies and defaults on all outstanding lender-originated rehabilitation loans.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	32 low- to moderate-income homeowners will benefit from health and safety-related home repair.
	Location Description	This activity will be available citywide.
	Planned Activities	The Minor Home Repair Program (MHR) is funded through the Community Development Block Grant Program (CDBG) from the U.S. Department of Housing and Urban Development (HUD). The program is available to qualifying homeowners who need assistance with necessary, eligible home repairs. Approved applicants can receive up to \$15,000 of home repair assistance for an eligible minor repair. The amount of assistance may be increased up to \$25,000 for roof replacement. Most repairs are exterior or interior repairs of plumbing, mechanical, electrical, or accessibility issues such as handicap ramps or door modifications and do not disturb paint.
5	Project Name	Fair Housing Education
	Target Area	Citywide
	Goals Supported	Public Service Grants

	Needs Addressed	Increase access to affordable housing Help underserved groups access and use resources Improve fair housing awareness and accountability
	Funding	CDBG: The Fair Housing work will be funded with CDBG funds allocated to this activity in 2021, 2022, and 2023 Annual Action Plans. If an assessment of fair housing is conducted, the City will use its CDBG Administration and Neighborhood Planning funds.
	Description	This proposed project funds fair housing education provided to low- and moderate-income housing seekers. This includes educational classes and seminars, fielding and investigating complaints, and making referrals or prosecuting fair housing violations.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	40 extremely low, low, or moderate-income families will receive training, and the Fair Housing Center will conduct real estate and rental housing market testing.
	Location Description	Services are offered citywide.
	Planned Activities	This proposed project funds fair housing education provided to low- and moderate-income housing seekers. This includes educational classes and seminars, fielding and investigating complaints, and making referrals or prosecuting fair housing violations.
6	Project Name	Facility Improvement – Early Childhood Center
	Target Area	Post-Franklin Revitalization Area Northcentral Revitalization Area

	Goals Supported	Facilities Improvements
	Needs Addressed	Better connect LMI neighborhoods and downtown Reduce the effects of low income on life quality Assemble properties for development in LMI areas Help underserved groups access and use resources
	Funding	CDBG: Funding of \$420,000 was allocated in the 2022 Annual Action Plan and \$70,000 in the 2023 Annual Action Plan
	Description	This project will fund the creation of an early childhood development center within the CDBG target area.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	160 extremely low, low, or moderate income families will receive education-related services.
	Location Description	
	Planned Activities	This project will fund the creation of an early childhood development center within the CDBG target area.
7	Project Name	Public Services
	Target Area	Citywide
	Goals Supported	Attainable Housing Public Service Grants
	Needs Addressed	Reduce the effects of low income on life quality Help underserved groups access and use resources Support efforts around homelessness prevention Improve fair housing awareness and accountability
	Funding	CDBG: \$180,000

	Description	This activity will provide funds for case workers for programs for low and moderate-income households. This project will be completely bid in July 2024
	Target Date	7/01/2024
	Estimate the number and type of families that will benefit from the proposed activities	240 low or moderate-income renters will benefit from the proposed activities.
	Location Description	Citywide
	Planned Activities	Caseworkers will provide and make referrals for resources and services.
9	Project Name	General Administration (HOME)
	Target Area	Post/Franklin Revitalization Area Fremont/McKinley Revitalization Area North Central Revitalization Area Wilson/Coburn Revitalization Area Urbandale Revitalization Area
	Goals Supported	Attainable Housing
	Needs Addressed	Preserve and maintain existing affordable housing Increase access to affordable housing Reduce the effects of low income on life quality Reduce areas of concentrated poverty Help underserved groups access and use resources Support efforts around homelessness prevention Improve fair housing awareness and accountability Improve property conditions in LMI neighborhoods
	Funding	HOME: \$32,000
	Description	The function of this City activity is to provide the necessary staffing to develop, implement, and monitor the overall performance of all HOME programs

	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project supports all the HOME funded projects.
	Location Description	
	Planned Activities	Staffing for HOME program oversight
10	Project Name	Infill Housing Program
	Target Area	Post Franklin, North Central, Central, Northeast, Urbandale, Minges Brook Riverside
	Goals Supported	Attainable Housing
	Needs Addressed	Increase access to affordable housing Reduce the effects of low income on life quality Reduce areas of concentrated poverty Help underserved groups access and use resources Improve property conditions in LMI neighborhoods
	Funding	HOME: \$85,338 CHDO Set-Aside \$430,880 of in-fill housing from 2021, 2022 and 2023 Annual Action Plans
	Description	This activity will provide gap funds for acquisition, development, and sale of single family housing within the City. At least one unit will be developed by a certified Community Housing Development Organization (CHDO). Upon completion of construction, these properties will be made available for purchase to low- to moderate income homebuyers.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Up to 4 low or moderate income homebuyers will benefit from the proposed activities.

	Location Description	Constructed homes will be located in the Fremont/McKinley or Northcentral Revitalization Areas, building on previous investments and activities in these areas.
	Planned Activities	This activity will provide gap funds for land acquisition, development, and sale of single family homes.
11	Project Name	Tenant-Based Rental Assistance
	Target Area	Citywide
	Goals Supported	Attainable Housing
	Needs Addressed	Increase access to affordable housing Reduce the effects of low income on life quality Reduce areas of concentrated poverty Help underserved groups access and use resources Support efforts around homelessness prevention
	Funding	HOME: \$168,662 in 2024 funding \$235,810 committed in 2021, 2022 and 2023 Annual Action Plans
	Description	This activity provides short term rental assistance of 3 to 6 months to eligible low-income households experiencing a housing emergency.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit	Approximately 90 households will benefit from rental assistance.
	Location Description	Activities occur citywide.
	Planned Activities	Tenant Based Rental Assistance will provide rental assistance to help people maintain safe, quality housing.
12	Project Name	Down Payment Assistance
	Target Area	Citywide
	Goals Supported	Attainable Housing

Needs Addressed	Increase access to affordable housing Reduce the effects of low income on life quality Reduce areas of concentrated poverty Help underserved groups access and use resources
Funding	HOME: \$200,000 in funds allocated in the 2021, 2022 and 2023 Annual Action Plans.
Description	This project provides down payment assistance to low and moderate income home buyers. Down payment assistance ranges from \$1,000 to \$10,000 based on need. Assistance will be offered in conjunction with other programs like fair housing education and home buyer education
Target Date	6/30/2025
Estimate the number and type of families that will benefit from the proposed activities	Approximately 20 households will benefit from down payment assistance.
Location Description	This activity will assist low and moderate income families citywide.
Planned Activities	Down payment assistance ranges from \$1,000 to \$10,000 based on need. Assistance will be offered in conjunction with other programs like fair housing education and home buyer education

AP-50 Geographic Distribution – 91.220(f)

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

The City has identified five geographic areas for targeted investment. These areas are called CDBG Revitalization Areas and are listed below.

While the boundaries are not coterminous, there is a correlation between poor housing conditions, minority race/ethnicity status and low- and moderate-income households in Battle Creek neighborhoods. These poor conditions are concentrated in portions of the Fremont/McKinley, North Central, Post/Franklin, and Wilson/Coburn Neighborhood Planning Council areas. The City has identified revitalization areas within each of these NPC areas that are at risk of decline (as is discussed in the section MA-50 "Needs and Market Analysis Discussion" of the Consolidated Plan).

These areas will be targeted with resources and programs intended to arrest neighborhood decline. This includes CDBG- funded City programs like Minor Home Repair and Code Compliance, as well as programs and activities operated by the Police Department, Parks and Recreation, the Department of Public Works, the Calhoun County Land Bank, community groups, and local non-profits. The proposed target areas encompass 7,183 residential parcels (of 17,000 citywide).

Geographic Distribution

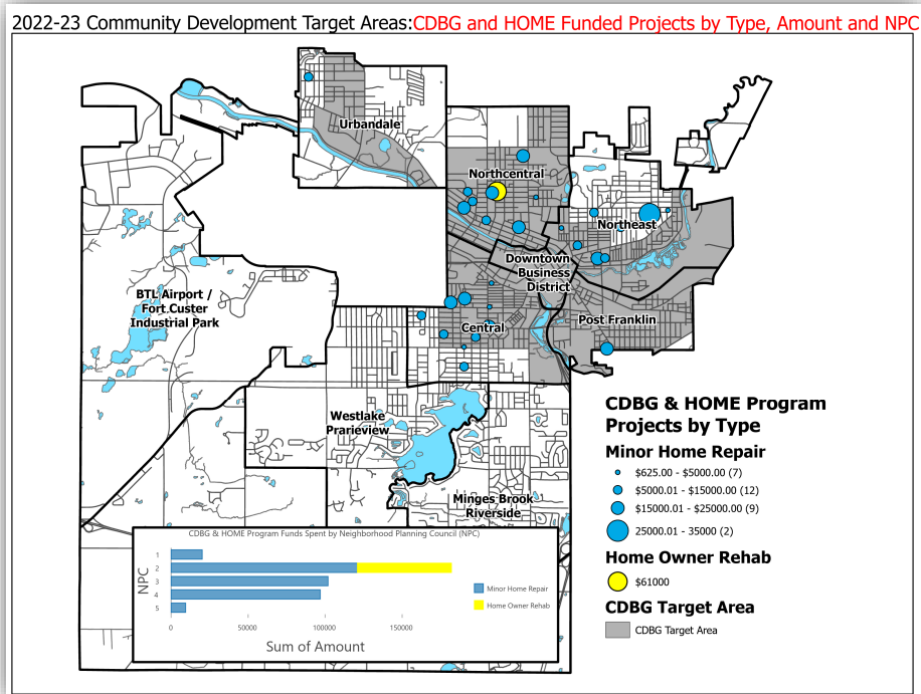
Target Area	Percentage of Funds
Post/Franklin Revitalization Area	20
Fremont/McKinley Revitalization Area	10
North Central Revitalization Area	30
Wilson/Coburn Revitalization Area	15
Urbandale Revitalization Area	15
Balance of City	10

Table 51 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Market analysis and survey data show the Post/Franklin, Wilson/Coburn and Northcentral Revitalization Areas to have the greatest need. Resources targeted to these areas build on investments from previous years. The Urbandale Revitalization Area has improved significantly and will likely be removed as a target area (based on the data) sometime during the next five years. However, distribution of funds to the Urbandale neighborhood is expected to increase by 10% compared to last year due to the investments in transit stops adjacent to affordable housing developments and a grocery store located in Urbandale.

Discussion: The City has been targeting resources in these neighborhoods for a long time. Each area is represented by a Neighborhood Planning Council where neighborhood residents, police officers, City Commissioners and City staff meet monthly to discuss neighborhood and city issues and initiatives. Each Neighborhood Planning Council was part of the citizen engagement process for the 2020-24 Consolidated Plan.



AP-55 Affordable Housing – 91.220(g)

In 2024-2025, the majority of people and families that will benefit from affordable housing resources will be homeowners seeking assistance with home repairs and individuals in need of financial assistance to purchase a home or access rental housing. The City's Minor Home Repair program will focus on smaller projects that address housing code violations and other housing deficiencies related to health and safety. A Tenant-Based Rental Assistance program will be offered that provides rental assistance to individuals facing eviction or housing instability. Down payment assistance will be offered to low and moderate income families to help them purchase a home

One Year Goals for the Number of Households to be Supported	
Homeless	90
Non-Homeless	196
Special-Needs	30
Total	316

Table 52 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	90
Production of New Units	4
Rehab of Existing Units	32
Acquisition of Existing Units	0
Housing Case Management	190
Total	316

Table 53 - One Year Goals for Affordable Housing by Support Type

Discussion: As discussed in the needs assessment, the most common housing problem in the City is severe housing cost burden, where residents pay more than 50% of their household income for housing and utility costs. This problem is more prevalent among renters (2,245 households) than home owners (1,260). However, this is largely the result of renters generally having lower incomes than homeowners.

Many of the target revitalization areas have older homes in need of repair. Housing cost burden contributes to the lack of upkeep. Another factor has been the low return on investment for homeowners that do repairs on their homes due to low sales prices. However, values are beginning to rise in CDBG Revitalization Areas with some areas of Washington Heights and the Post/Franklin areas seeing 60 to 90 percent increases in residential prices over the last five years—outpacing the City as a whole. This is creating incentives for property owners to invest in these neighborhoods and is creating wealth-building opportunities for some low and moderate-income families.

AP-60 Public Housing – 91.220(h)

The Battle Creek Housing Commission is a medium-sized housing authority which owns and manages 320 units of public housing with family units at Parkway Manor and Northside Homes and older adults and disabled housing at Cherry Hill Manor and Kellogg Manor. The Battle Creek Housing Commission is currently in the process of converting its public housing inventory of housing to project based vouchers through the Rental Assistance Demonstration (RAD) program so that now rents and operating costs will be reimbursed from the U.S. Department of Housing and Urban Development through the multi-family portfolio instead of public housing division. The incentive to do this is that the reimbursement from HUD is more stable and is usually higher. Cherry Hill which provides 150 one-bedroom units to older adults, age 50 and over, will fully convert January 1, 2025. Kellogg Manor, 70 units for people with disabilities and older adults, age 50 and over; Northside Homes, 16 single family homes scattered within the Washington Heights neighborhood, and Parkway Manor, 84 apartments for families is in the application process for converting and should be approved in the summer of 2024 for conversion January 1, 2026.

The Housing Commission has budget authority for 700 Housing Choice vouchers which includes 175 of HUD-VASH certificates for veterans who have experienced homelessness. It also owns and manages 19 remaining single-family homes available for homeownership in a lease- to- purchase program. This program started with 150 homes that have been sold to families to create homeownership. The Battle Creek Housing Commission opens its Housing Choice Voucher Program waiting list annually in April. Sign-up for the waiting list is online and the Battle Creek Housing Commission draws 300-500 names by random, computerized lottery to be placed on the waiting list.

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

The Battle Creek Housing Commission and the City of Battle Creek have a close working relationship and collaborate on joint projects including human resource services. There are no planned activities using federal CDBG or HOME funding in the next program year for public housing. The Community Development Supervisor and the Community Services Director serve on the Board of the Battle Creek Housing Commission.

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

The Battle Creek Housing Commission provides opportunities for families who apply and qualify for entrance into the homeownership program. In 1990, the Housing Commission constructed 150 single family homes in a HUD funded Turnkey III program. Nineteen single family homes remain to be sold in the program, scattered throughout neighborhoods in the Battle Creek area rented to qualified families with an option to purchase that is exercised at the option of the resident family. Residents must be employed and/or have a continuing source of income and remain employed throughout their rental term. Two, three and four bedroom units are available. Residents are responsible for all utilities and agree to perform all routine and non-routine maintenance. One hundred seventy-six of these homes have already been converted from rental to homeownership by the resident families and this has proven to be a very successful program.

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

The Battle Creek Housing Commission is not a troubled agency. While older, the housing commission housing stock is in good condition. Cherry Hill was built in 1970 and is in the initial development phase of undergoing a major rehabilitation of its common areas and entrance with financing through the Low Income Housing Tax Credit program.

Discussion: The Battle Creek Housing Commission has been a member of the Greater Battle Creek Homeless Coalition for a number of years and the Executive Director is a Co-chair of the Housing Solutions Board.

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

In spring 2024, the Lead Planning Body for the Battle Creek/Calhoun County Continuum of Care notified HUD and MSHDA that it was resigning from this role to focus its agency's attention away from housing and homelessness to focus on providing mental health services. Summit Pointe, the community mental health agency for Calhoun County had served in the lead planning body role since the beginning of the Continuum of Care requirements. Through a competitive process, the Housing Solutions Board, the decision-making body for the Continuum of Care, selected the United Way of South Central Michigan to be the new lead planning body. The United Way currently also serves as the Lead Planning Body for the Kalamazoo City and County Continuum of Care.

Michigan HMIS Data Warehouse for 2023	Count	Average Age
Adults	1,029	44
Children	201	6
Michigan HMIS Data Warehouse for 2022	Count	Average Age
Adults	965	44
Children	199	6

HUD 2023 Continuum of Care Funding Awards for Battle Creek/Calhoun County (MI-514)		
Organization Awarded	Type of Funding	Annual Award
Drop-In Self-Help Center	Supportive Services 2023	\$32,360
Haven of Rest Ministries Inc.	Life Recovery Renewal FY2023	\$88,330
S.A.F.E. Place	Calhoun County Domestic Violence Services	\$104,172
Summit Pointe	CoC Planning Project FY2023	\$50,000
Summit Pointe	HMIS FY 2023 Renewal Project	\$40,000
Summit Pointe	Permanent Supportive Housing FY 2023 Renewal Project	\$79,547
Summit Pointe	Permanent Supportive Housing FY 2023 Renewal Project	\$78,053
Total 2023 Award		\$472,462

In June 2023, Neighborhoods, Inc. received a \$500,000 two year Shelter Diversion grant award from the Michigan State Housing Development Authority (MSHDA) to fund short term rental assistance and staffing. For federal Emergency Shelter Grant (ESG) funds, Battle Creek/Calhoun County participates in the MSHDA Balance of State process for funding, because our population

is not large enough to qualify as an entitlement for the ESG program. Here is a review of what the ESG program has funded in Battle Creek in 2023 and 2022:

MSHDA Emergency Shelter Grant (ESG) Balance of State Competition		
	2023	2022
Neighborhoods, Inc. of Battle Creek, Housing Assistance Resource Agency (HARA)	\$ 123,053.00	\$ 109,634
Haven of Rest Ministries - Emergency Shelter	\$ 40,150.00	\$ 38,944
Battle Creek Shelter	\$ 21,159.00	\$ 21,959
Battle Creek Community Foundation		\$ 13,827
Total Awards	\$ 184,362.00	\$ 184,364.00

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

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

Outreach to homeless people occurs mainly by the staff of the SHARE Center and the Haven of Rest. The current peer support/recovery coach who performs outreach for the SHARE Center is paid through a HOME-ARP grant through June 30, 2025.

The SHARE Center serves as a Daytime Drop-In center with coffee, breakfast items, bathrooms, personal hygiene kits, complimentary haircuts, daily meals, personal identification facilitation, computer lab, telephone services and laundry facilities. The SHARE Center staff facilitate one-on-one and group sessions supporting recovery, in addition to case management, which coordinates care for homeless people requiring medical, behavioral and substance abuse services. The SHARE Center also facilitates enrollment into the Healthy Michigan Plan Medicaid expansion program, and provides the SHARE Center mailing address and phone number to the homeless individuals/families for enrollment/health plan information correspondence. The day shelter also works to engage people in employment services and coordinates housing solutions. The SHARE Center works closely with the Department of Veterans Affairs to support all the veterans who use the Center. The SHARE Center is funded by the Michigan State Housing Development Authority's Emergency Solutions Grant.

Staff at shelters engage people in services and help them find housing. The Haven has a dedicated staff person with lived experience who leads outreach efforts. Volunteers work with him to distribute items like sack lunches, bottles of water, clothing, or blankets depending on donations and what is appropriate for the

weather at the time to homeless people living on the street and not in any of the shelters.

The U.S. Department of Veterans Affairs in partnership with the Homeless Coalition also annually organizes a Calhoun County Connect & Veteran's Stand Down health fair which engages the homeless community and veterans in services and provides free basic needs items to people. It offers free haircuts, lunch, toiletries, blankets, and other free items. This event is always widely attended and providers offer services to engage homeless people. The VA also has outreach staff who work with the shelters to enroll veterans in services. About 300 people attend this event hosted at the City's recreation facility every October.

Battle Creek has several meal programs that offer outreach services where individuals and families come for meals including the SHARE Center; Salvation Army Sally's Kitchen lunch program, Monday through Saturday; Upton Avenue Original Church luncheon program every Tuesday; St. Philip's Sunday Supper program; God's Kitchen; and St. Thomas Episcopal Church summer breakfast program, which provides a healthy breakfast when children/families are not able to receive school breakfasts.

A weakness in Battle Creek's Continuum of Care is that none of the shelters serve unaccompanied minors under the age of 17. Child Protective Services helps place youth but there isn't a licensed facility available to serve children and teenagers that are no longer part of a family unit.

2) Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Battle Creek's inventory of emergency and transitional beds is usually adequate to fill the needs for men, but there is an increased number of women and families seeking emergency shelter.

There is a continuing need for case management to help people connect to housing, employment and services. There is an unmet need in permanent supportive housing and in affordable housing in quality condition for families and individuals. Homeless providers work creatively to obtain private donations, government funding and foundation funding to fulfill their missions to help homeless people and others leaving unsafe home situations. They work constantly to maintain funding for their current inventory of shelter beds and services.

The City's HOME-ARP funds were allocated to support these needs, including five sub-grants to homeless service providers to provide housing case management and other supportive services. 360,000 was allocated to provide gap funds for a 55 unit permanent supportive housing development.

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

There is a shortage of safe, quality, affordable housing in Battle Creek for low-income families and individuals. A housing counselor will work with a family or individual to see if they qualify for available housing assistance. The first step is always to obtain Social security cards and birth certificates.

The Haven provides case management to help families and individuals obtain a regular income to pay for housing and to access community resources to help prevent further episodes of homelessness.

VOCES provides housing advocacy and interpretation services to the Latino/Hispanic community. This has been an important aspect of helping the Spanish-speaking community access housing resources. The goal is general increased awareness of available resources and navigating the often complex application process.

Goodwill's Financial Opportunities Center has an excellent financial fitness program to help people work through debt and low credit scores. Legal Services provides legal services and eviction prevention. Women's Co-op provides support for women leaving poverty and seeking help through their store, volunteering and the Solutions Highway Program. Neighborhoods, Inc. of Battle Creek provides homeownership counseling for those interested and able to own their own home, and also rents units to people recovering from homelessness.

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

Several organizations provide homelessness prevention in the Greater Battle Creek Homeless Coalition including Neighborhood, Inc. which provides foreclosure counseling and helps people restructure their debt and mortgages; Goodwill Financial Opportunities Center which also provides budget and foreclosure counseling; Legal Services which provides legal intervention and education about foreclosures and evictions.

Neighborhoods, Inc. is also the Housing Access Resource Agency (HARA) for Calhoun County, which provides eviction prevention services and help for homeless people to find housing. Neighborhoods, Inc. supports housing solutions for homeless people through several grant funding streams, primarily through the Michigan Housing Development Authority (MSHDA) and the U.S. Department of Housing and Urban Development (HUD). NIBC is sub-recipient of CDBG-CV, HOME-ARP and HOME TBRA funds with plans for continued partnership.

- MSHDA Emergency Solutions Grant (ESG) Homeless Prevention Financial Assistance and Case Management funding provides individual support, relocation, housing stabilization services, and financial assistance to avoid eviction and prevent homelessness.
- MSHDA ESG Rapid Re-Housing (RRH) funding includes Case Management and Financial

Assistance to provide individual case support, housing stability services and short-term funding to cover security deposit funding and up to six months' rent to rapidly exit homelessness.

- MSHDA ESG Homeless Management Information System (HMIS) funding provides data management support.

The Homeless Coalition has negotiated discharge protocols with local police departments and hospitals in past years. There is a need to reexamine them with the Calhoun County Jail, Calhoun County Sheriff's Department, the Battle Creek Police Department, and the two local hospitals, Bronson Battle Creek near downtown and Oakland Hospital in Marshall.

Discussion Battle Creek has experienced, caring organizations providing shelter and supportive services. The Haven has developed treatment programs for helping people overcome substance abuse problems and other issues that hamper re-establishing independent living. Summit Pointe, Battle Creek's community mental health provider, has expanded its mental health services to serve those who are dually diagnosed with both mental health and substance abuse disorders. The SHARE Center provides outreach and peer mentoring in an environment rich with services for those making changes in their lives. There continues to be a shortage of housing case management to help people find and remain stable in permanent housing. There is also a shortage of permanent supportive housing. Transportation also remains a challenge. The shortage of subsidized housing inhibits the implementation of the Rapid Re-Housing and Housing First models. While workers at the Haven and the SHARE Center help connect people to services in the community, there remains a shortage of affordable housing for those with low incomes. S.A.F.E. Place works with victims recovering from domestic violence who also find housing a difficult piece of the recovery puzzle.

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

The City of Battle Creek has periodically reviewed State and local regulations, policies and practices to continue to make improvements and eliminate barriers to families accessing affordable housing. There are a number of State and local regulations designed to promote the orderly development and maintenance of safe, decent and sanitary housing in the community. Sometimes these regulations can act as barriers to affordable housing, and city staff continue to make adjustments.

In the City's last Analysis of Impediments to Fair Housing, there were no specific regulations listed as impediments to fair housing. Several recommendations were made for the City to explore and consider zoning and land use changes. These recommendations and the City's action steps are included in its 2019 Fair Housing Report and progress is evaluated in a subsequent assessment report completed in 2020.

The 2019 Fair Housing report covers four years of activities by the City and its partners to address fair housing issues in Battle Creek. Activities include public engagement, training, seminars, 9 systemic investigations, numerous events, the creation of a Human Relations Board and a Beyond Separation Task Force. The 2019 Fair Housing report is available on the City's website at: www.battlecreekmi.gov/566.

The City is in negotiations with the Fair Housing Center of South West Michigan to sign a contract for two fair housing trainings and investigations of the rental and real estate market. The investigations follow up on the 2015 and 2018 testing of fair housing.

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

To eliminate duplication, the City uses the building codes established by the State for uniform construction standards. These standards parallel the three National Code standards and are minimum provisions to ensure general safety for the public. The State codes and guidelines are also appealable to the State. Consequently, the City's building codes do not appear to hinder the development or preservation of affordable housing.

Likewise, the locally established Minimum Housing Code does not create a barrier for affordable housing. These standards parallel the International Property Maintenance Code (IPMC) and are minimum requirements established to preserve and promote the public health, safety, comfort, personality and general welfare of the people. Their enforcement is necessary to preserve and encourage the private/public interests in housing and its maintenance. At the same time, these standards are appealable, locally, to ensure there are no undue hardships. An examination of the community's fee structures indicates the City's building permit fees and charges are at a median, as compared to surrounding communities.

The City's zoning and land-use codes promote the morals, aesthetics, prosperity, health, safety and general welfare of all people in Battle Creek. These codes are constructed to allow compatible development throughout the community and are flexible enough to encourage redevelopment in the community's existing, established areas. This is evidenced by development in both the City's outlying and urban areas. These codes, like other local codes, are appealable locally to ensure equitable and fair treatment. All residential properties are assessed on a citywide basis using market sales data of comparable properties in and around the immediate neighborhood. Citywide assessing appears to ensure an equitable treatment of residential property and provides an incentive to those who maintain and improve their properties. The current public policies relating to housing and, in particular, affordable housing, do not appear to be excessive, exclusionary, or discriminatory nor do they duplicate any other policies.

The City of Battle Creek is participating in the Redevelopment Ready Communities initiative through the Michigan State Housing Development Authority. This state-wide program promotes communities that are competitive and ready for redevelopment. The process and eventual certification ensures that a community is transparent, predictable, and efficient in their daily development practices, which includes having a streamlined development review process. The third-party review and potential regulatory and/or policy changes that will come out of this program will ensure that those coming forward to invest in property can do so as efficiently and expeditiously as possible.

The City's master plan was updated in 2018; part of this review included research and recommendations for housing development and redevelopment, including the availability of diverse housing options and affordability levels

Real Estate:

In the Battle Creek housing market there is limited variety in the types of available housing suitable for different types of households. The Fair Housing studies identified a need to increase the variety of owner and rental housing in the City (more than just single family homes) for empty nesters, students, young professionals and the elderly. This needed housing should be located downtown where pedestrian amenities, educational opportunities, public transportation and fewer maintenance burdens exist.

Evidence points to possible Fair Housing violations in real estate advertising. A review of rental advertisements in one publication indicated that few promotional photographs feature minority residents. The AI recommended further evaluation of advertising. The Battle Creek Area Association of Realtors does display the equal opportunity logo at events, on their website and does adhere to a code of ethics.

Public Policy:

A special permitting process is required to establish a State licensed residential facility. Battle Creek requires a minimum lot size and a special permitting process for establishing a State licensed residential facilities in the City.

A review of discrimination complaints and fair housing testing indicates that Battle Creek may have instances of housing discrimination based on familial status (presence of children under the age of 18).

Neighborhood Conditions:

In some neighborhoods there is a concentration of substandard rental housing units in minority census tracts. The AI found a strong correlation between older housing stock and the presence of racial minorities and suggested increased code enforcement, continue the rental registration program and increase public-private rehabilitation programs for rental housing using HUD, MSHDA, and historic tax credits.

Finance:

For some residents, credit issues limit financing options and the ability to qualify for a loan. Many applicants are denied mortgages due to poor credit or lack of credit. Goodwill's Financial Opportunities Center and Neighborhood, Inc. have foreclosure and homeownership programs that teach financial literacy, help prevent homeless and provide homeownership coaching. Evaluation of lending patterns is an area the City should explore further. The City could encourage lending institutions to consider alternative measures to determine credit worthiness such as utility bills and occupational longevity. The AI suggested the City host a roundtable with lending institutions to discuss the outcomes of the HMDA data and trends and the need for investment in lower income census tracts.

Socioeconomic:

Some neighborhoods demonstrate a concentration of socio-economic problems and poverty. Increasing socioeconomic integration has the positive benefit of decreasing poverty concentration, decreasing blight, increasing social capital and increasing variety in neighborhoods, and promoting in-fill development.

AP-85 Other Actions – 91.220(k)

Federal community development funding is spent by the City of Battle Creek to improve neighborhood conditions for residents to feel safe and enjoy a vibrant, healthy community. Funds and planning activities are intended to help restore and support the private, housing market especially in low-and moderate-income areas. For the 2020-2024 Consolidated Plan, an extensive public engagement strategy was undertaken including a community survey, community forums and meetings with Neighborhood Planning Councils. Local priorities resulting from the planning process include:

1. Ensure Housing is Affordable, Accessible, and Safe
2. Activate Underutilized Land in Low Income Neighborhoods
3. Alleviate Poverty
4. Community Engagement Through Collaboration and Empowerment
5. Affirmatively Further Fair Housing
6. Restore Vitality in Low Income Neighborhoods
- 7.

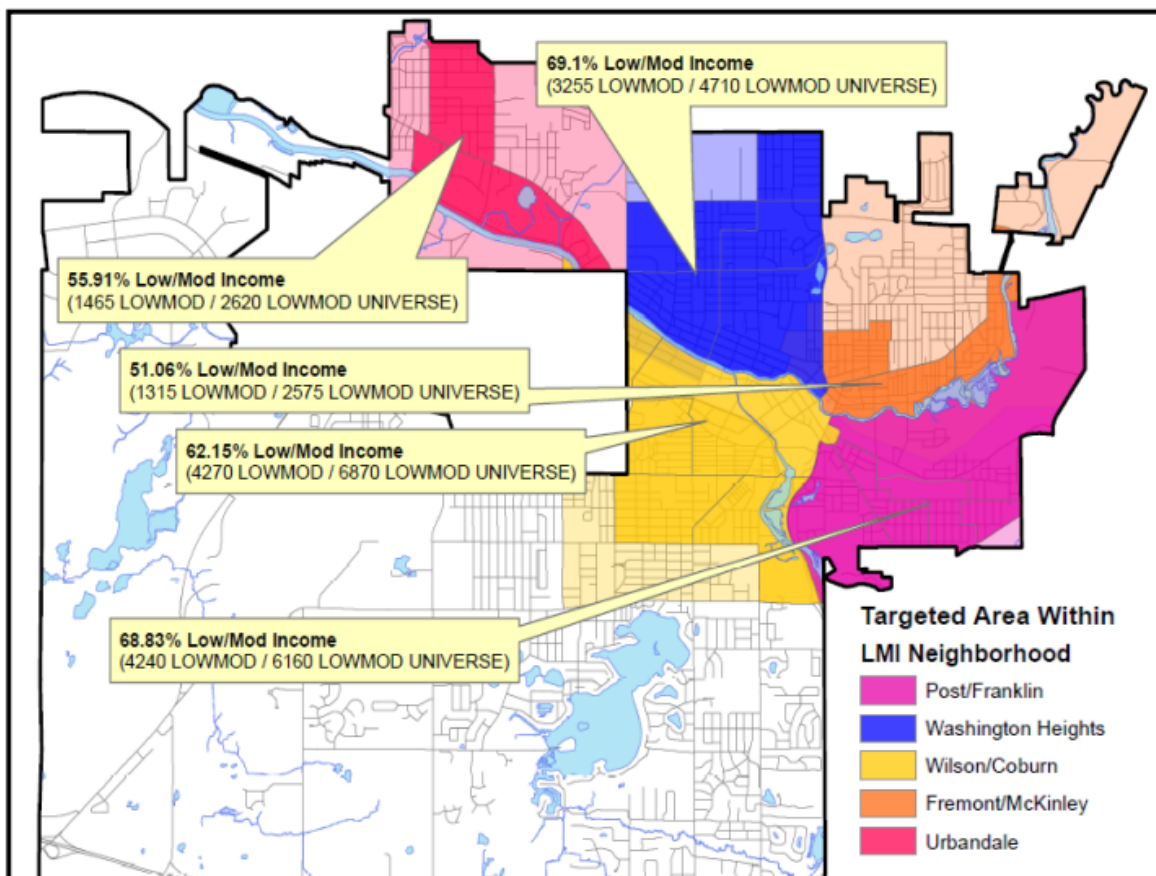
Actions planned to address obstacles to meeting underserved needs

Almost all CDBG and HOME funding is spent in low-and moderate-income areas of the community. These neighborhoods are identified in the five revitalization areas set up in the 2020-2024 Consolidated Plan. The City will continue to implement housing and community development activities that meet the underserved needs in the community.

Actions planned to foster and maintain affordable housing

See AP-55 for a discussion on Affordable Housing activities to be undertaken in the 2022-23 program year. Housing has typically been relatively affordable in Battle Creek in recent years (compared to other comparable communities), with the condition and safety of housing affordable to those with low-incomes being the greatest concern. However, in the last few years home sale prices have increase as much as 60-

90% in some LMI areas. Rents in the State were up 2.1% year over year in 2022. Anecdotal data suggests that rents in Battle Creek have increased significantly more since the fall of 2021 when the eviction moratorium ended.



The City offers Minor Home Repair to help sustain low and moderate-income homeowners in their housing. In a given year, anywhere from 30 to 50 percent of participants in the program are single seniors on fixed incomes. Often these seniors have paid off their mortgages and are living in areas where they have built up supportive social networks. Minor Home Repair assistance helps with costs that might otherwise cause a senior to be displaced from an otherwise independent living situation.

Many partners have been working on creating viable infill housing models for Battle Creek neighborhoods, including the Calhoun County Land Bank Authority (CCLBA), the Urban League, Neighborhoods Inc. of Battle Creek (NIBC), and Habitat for Humanity, and Washington Heights United Methodist Church Hub of Hope. The CCLBA received a \$500,000 private foundation grant to do some infill housing in the Washington Heights area. The Urban League, NIBC, and the Hub of Hope have prepared or are working on proposals for infill housing developments. The City will release an RFP in 2024 for infill housing proposals using HOME funds. The City of Battle Creek with Kellogg Foundation funds has completed a housing assessment, which will be available in spring 2024.

The City Manager's office continues to take the lead on facilitating a permanent supportive housing

development in Battle Creek. Upholding a Chicago-based developer of permanent supportive housing, submitted a Low Income Housing Tax Credit (LIHTC) application to the Michigan State Housing Development Authority (MSHDA) in October 2023 for a 55-one-bedroom apartment development. Most of the land for this proposed development is City-owned land and is located in NPC #1, a CDBG target area. HOME-ARP and HOME funding are budgeted to provide some gap funding for this development. The Battle Creek Housing Commission has pledged 55 Project-Based Vouchers to fund the operating costs of the housing. LIHTC funding announcements are expected in spring 2024.

Actions planned to reduce lead-based paint hazards

Any rehabilitation activities on housing units constructed prior to 1978 will have lead hazards identified and actions taken to remove the hazard. All rehab work is required to be done with lead safe work practices. In the rehabilitation of homeowner housing, homeowners receive an EPA Lead education pamphlet and sign a notice that they have received such notification.

The City of Battle Creek has two Lead Abatement Programs that will address lead hazards in housing in the 2024 program year. The Lead Safe Program is a Michigan Department of Health and Human Services funded program that uses \$1.5 million in CHIP Medicaid funds to do full lead abatement on homes that have a child or pregnant woman on Medicaid living in them. The program is implemented by the City of Battle Creek in partnership with Community Action (CA) with City Staff completing projects within the city limits and CA completing projects in the balance of the county.

The second lead program is funded with a \$3.4 million HUD lead hazard control grant that began in January 2021 and is funded until June 30, 2025. The Lead Hazard Control Program assists low and moderate-income families living in housing built before 1978 with identifying, controlling, and/or abating lead hazards. This grant is offered to families countywide. Community Action is the city's partner on this grant, implementing projects in the areas of the county outside the city limits.

Actions planned to reduce the number of poverty-level families

With a high poverty rate of 22%, reducing poverty is a goal for Battle Creek. A number of collaborative efforts are under way to improve the quality of life and economic well-being of residents, including:

- Minor Home Repair loans help sustain families in affordable owner-occupied housing. Because property values in downtown neighborhoods are beginning to rise in recent years, this creates a wealth building opportunity.
- United Way's ALICE Analysis, United Way's educational effort to focus programs and policy on those families struggling just above the poverty line to make it financially.
- Women's Co-op, Solutions Highway, a coaching program working with LISC's Financial Opportunities Center and volunteering to help low-income women improve their family and employment outcomes.

- Down payment assistance will be offered to create pathways to homeownership for low and moderate income families
- As part of its collaboration with TRHT, the Battle Creek Area Association of Realtors, the Fair Housing Center, and the Urban League, the city continues to work to reduce the homeownership gap between whites and people of color in Battle Creek—disseminating a locally created 10 page homebuyer guide and holding homebuyer workshops facilitated by African American and Hispanic/Latino Realtors and community leaders.

Actions planned to develop institutional structure

The primary focus in 2024 will be the same as last year: to address the limited current delivery system capacity due to not having a strong housing development organization. There are many fine organizations with competent leaders working on various aspects of housing and community development.

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

The City is involved in numerous collaborations and efforts to improve resident and community engagement. The City will continue with its participation in the Homeless Coalition and the Housing Solutions Board, Battle Creek Realtor Association Committee for Diversity and Inclusion; and the Truth, Racial Healing, and Transformation Initiative. The City is participating with the Calhoun County Public Health Department to reinvigorate the Lead Poisoning Prevention Task Force in the spring of 2024. The Lead Task Force has stopped meeting regularly during the COVID pandemic. The City of Battle Creek will continue to work with the Calhoun County Land Bank Authority to maintain and make use of the properties held for redevelopment in the City.

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

The City of Battle Creek Community Development Division's goal is to implement programs in compliance with HUD and other Federal regulations. Program income is tracked and spent first before program funding. Sub-recipients are monitored and provided technical assistance to also be in compliance with Federal regulations. Funds are always competitively bid in accordance with procurement rules.

Community Development Block Grant Program (CDBG) Reference

24 CFR 91.220(l)(1)- None of these items apply to the City of Battle

Creek CDBG program

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

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

Total Program Income:	0
------------------------------	----------

Other CDBG Requirements

- | | |
|---|------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 100% |

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

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

The City of Battle Creek will utilize \$320,000 in its PY 2024 HOME allocation to fund only HOME eligible activities as listed in CFR 92.205. No other form of investment is being used beyond those identified in Section 92.205.

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

Resale and Recapture guidelines used by the City of Battle Creek are discussed below.

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

The City of Battle Creek utilizes the recapture option in its homebuyer and homeowner rehabilitation programs. The City reserves the right to utilize the resale option at its discretion when developing a new HOME-funded program or activity. Sub recipients and CHDOs use the same recapture policy as the City of Battle Creek.

Recapture: Under the recapture option, the City of Battle Creek will require the initial HOME assisted homebuyer/homeowner to repay the outstanding HOME subsidy at the time of resale. The HOME subsidy will be forgiven on a pro rata basis, depending on the amount of assistance originally given, of 1/5, 1/10 or 1/15 per year. On a pro rata basis, the assistance will be fully forgiven after the term of affordability ends. The term of affordability will end, as a result of the sale of the assisted property by the homeowner, when the adjusted pro rata subsidy is repaid in whole to the City. At no time will the amount subject to recapture exceed the amount of the net proceeds from the sale of the property. The recapture provision will be enforced with a recorded lien on the assisted property. Deed restrictions will be utilized as needed and appropriate.

Resale: The homebuyer may sell the property during the term of affordability provided that the following conditions are met: The subsequent purchaser is a low or moderate-income household that will use the property as their principal residence, pay homeowner insurance, and keep property taxes current. Low- or moderate-income households are defined as households whose gross annual income does not exceed 80 percent of the area median income, adjusted for household size. Due to space limitations, the rest of the resale policy is described in the 2024-2025 Consolidated Plan and in the City of Battle Creek's HOME Policies and Procedures.

The fair return on investment will equal the sum of 1) the amount of the homeowner's investment, and 2) the amount of the standardized appreciation value, less any investment by the City required at the time of resale to enable the property to meet local housing code. The homeowner's investment is

calculated by adding the down payment made by the homeowner during the period of ownership, and the value of the mortgage principal repaid by the homeowner during the period of ownership and the value of any improvement installed at the homeowner's expense. The standardized appreciation value will equal three percent of the original purchase price for each year the homeowner holds title to the property, calculated as one-quarter percent per month.

The sale price of the property may not exceed the lesser of 1) the appraised value of the property at the time of sale, or 2) a sale price that provides for an affordable mortgage. The sales price must also be under the HOME Homeownership Value Limits (95% of area medium property value). HOME Homeowner Value Limits are found in Appendix 9. A mortgage is considered affordable if the monthly payment for principal, interest, taxes and insurance (PITI) does not exceed 30 percent of the gross monthly income of a household with an income that is between 70 and 80 percent of area median income adjusted for household size. If necessary, the City of Battle Creek will invest additional HOME funds to assure the subsequent mortgage is affordable.

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

The City of Battle Creek will not use HOME funds to refinance existing debt secured by multifamily housing. HOME funds will also not be used to rehabilitate multifamily housing in conjunction with any refinancing of existing debt.

Discussion:

The City of Battle Creek utilizes a first-come-first-served application policy for programs implemented directly to citizens. Applications to City programs are available online at the City's website and available for pickup at City Hall during normal business hours. Applications are regularly mailed out to potential clients when requested or identified as a candidate for City programs.

Sub-recipients are monitored and provided technical assistance to also be in compliance with Federal regulations. Funds are always competitively bid in accordance with procurement rules.

The City uses HOME affordable homeownership limits for the area provided by HUD.