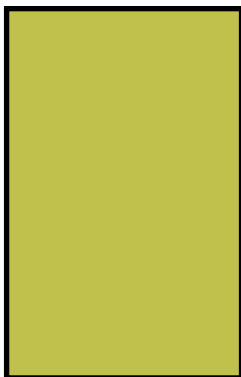


City of Battle Creek 2022 Annual Action Plan



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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.

The City continues to administer CDBG-CV funds allocated to it as part of the CARES Act. These activities are detailed in the City's Amended 2019 Annual Action Plan which is available on the City's website www.battlecreekmi.gov/181.

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.

In order to achieve this goal, the plan has six strategic priorities.

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, development of new units, increasing the diversity of housing options, 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 puts an emphasis on projects that promote ownership, create or clarify pathways for community members to access and utilize resources; and/or that 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 2020-21 Program Year the City CDBG and HOME programs funded code enforcement, general administration and strategic planning, minor home repair, homeowner rehabilitation, acquisition/development/resale, fair housing training, and tenant-based rental assistance. CDBG-CV funds, allocated to the City via the CARES Act, were used to fund an emergency homeless shelter, rental assistance, utility assistance, housing case management, and eviction diversion.

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 area median income.

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:

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

- The City's Minor Home Repair program completed 49 projects for low- and moderate-income homeowners.
- The City's CHIP Medicaid-funded Lead Safe Program completed full lead abatement of 18 residential units.
- Code Compliance completed 658 rental property inspections within CDBG target areas.
- The City applied for, and was awarded, a \$3.4 Lead Hazard Control and Healthy Homes grant from HUD.

Local Priority 2: Activate Underutilized Land in Low Income Neighborhoods

- The Calhoun County Land Bank Authority (CCLBA) neighborhood mow and maintenance program enlisted seven different community groups to mow and maintain 300 vacant lots in the City of Battle Creek throughout the program year. The program provides non-profit groups, churches, youth employment and neighborhood groups that commit to mowing and maintaining 20 vacant lots per assignment with a \$3,000 stipend for the season.
- Held a funders symposium that brought together local community-based organizations redeveloping vacant land and local, state, and federal funders. Local organizations had their proposed redevelopment projects scored against the Consolidated Plan using the City's strategic value scorecard, and funders shared about funding sources and best practices.

Local Priority 3: Alleviate Poverty

- 31 people were provided rental assistance through Summit Pointe's CDBG-CV funded program.
- 10 people were provided rental deposit and rent assistance through Summit Pointe's TBRA program.
- 264 domestic violence shelter clients were provided hotel vouchers to address lost shelter beds due to COVID-19 and the need for social distancing.
- 46 people were provided utility assistance through Community Action's CDBG-CV assistance program.
- The City's Full Blast recreational facility was converted into an Emergency Homeless Shelter using CDBG-CV funds in the summer of 2020 to address lost shelter beds due to COVID-19 and the need for social distancing. 334 individuals were provided shelter.

The City had planned to fund down payment assistance (DPA) and transit infrastructure programs during the program year, but delayed start of the programs due to the pandemic. The City will implement a DPA program in 2022. Transit infrastructure funds from 2020 and 2021 totaling \$300,000 will be reallocated to other activities in the 2022-23 Annual Action Plan and transit infrastructure activities will be rescheduled for the 2024 and 2025 program years.

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.
- The Beyond Separation Design Team held a housing virtual learning event in February 2021 and created a home buyer curriculum for promoting the home buyer guide created in 2020. Two virtual workshops were held in 2021.
- City staff continue to serve on the Battle Creek Homeless Coalition and Housing Solutions Board.

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.

- Staff continues to work with the City’s Human Relations board, which reviews and advises on fair housing issues and the results of systemic investigations.
- The Fair Housing Center of Southwest Michigan conducted 2 fair housing trainings that resulted in 20 individuals being trained on fair housing rights.
- City hired the Fair Housing Center to conduct a Fair Housing public awareness campaign
- Hired Truth, Racial Healing, and Transformation (TRHT) Initiative to complete an Affirmative Marketing Report and Plan for the implementation of the City’s CDBG-CV grants. Available online at: [Affirmative Marketing Report & Plan - Google Docs](#).
- Based on findings of the Affirmative Marketing Report, the City funded a position at VOCES to provide housing case management for Latinx individuals and families affected by the pandemic.

Local Priority 6: Restore Vitality in Low Income Neighborhoods

- Code compliance completed 1051 enforcements in CDBG target areas to address health and safety issues, including 43 new vacant building enforcements and 42 citations to secure vacant buildings previously identified.
- Code Compliance issued 17 vouchers for free paint to property owners with peeling paint violations (funded with local resources).
- The Rental Rehabilitation program converted vacant spaces on the second and third floors of a

downtown building into three units of affordable housing.

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 onset of the pandemic has had an effect on many of the City's normal citizen participation practices. In normal years the City's Citizen Participation Plan requires consultation with Neighborhood Planning Councils (NPCs). The City suspended the NPC meeting schedule in March of 2020 and is not expected to reconvene them until the spring of 2022. In late 2021 and early 2022, community development staff conducted consultations with 15 organizations and collaborative groups as well as gathering information via survey from 8 organizational partners.

The City amended its Citizen Participation Plan in April of 2020 to suspend the requirement to consult with NPCs during the pandemic, allow for shortened public comment periods, and hold virtual public hearings. A public hearing on community needs was held on February 16, 2021 during the City Commission meeting. A public hearing on the proposed 2022 budget and Annual Action Plan is scheduled for the April 19, 2022 City Commission meeting.

In lieu of the normal consultation with NPCs, city staff did use other engagement opportunities to assess community needs and get public input. These included participating in Truth, Racial Healing, and Transformation (TRHT) Leadership Team and Beyond Separation Team, which convened local community groups and agencies around racial equity and housing issues throughout 2021-22 program year. Staff consulted with a racial equity task force convened by TRHT for the CDBG-CV affirmative marketing plan regarding housing and community development needs.

5. Summary of public comments

An analysis of survey respondents and data collected in the 2020 citizen engagement process is attached in the **2020 Public Engagement Report**. Several local service providers expressed support the priorities identified by the City.

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 local newspaper. Annually, the City Commission holds four public hearings about federal community development funding. One public hearing is held in the winter of each year to solicit citizen input on Battle Creek's housing and community development needs. A hearing is held in late winter to gather citizen input on the City of Battle Creek's annual performance report on CDBG and HOME funded activities. A third public hearing is held in the spring to obtain citizen comments and review of the proposed budget and use of funds. A fourth public hearing is held in April to receive

comment on the proposed Annual Action Plan. The City can combine the public hearings on the proposed budget and the Consolidated and/or Action Plan.

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

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for 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 51,534.

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 Manager, a Housing Rehabilitation Coordinator, a Lead Inspector, a Lead Grant Coordinator, a Community Development Coordinator, a Construction Specialist, an Intake Specialist and an Administrative Assistant. The Community Development Manager 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, for overseeing the day-to-day operations of the government, and appointing government's department heads.

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

Agency Role	Name	Department/Agency
CDBG Administrator	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

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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 related to the coronavirus pandemic, 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 Rental Round table, a group of landlords and service providers focused on second-chance rentals; the Communities of Color Giving group which centers community based organizations led by people of color; Purpose Built Communities, led by the Battle Creek Public School District and connecting stakeholders around health, housing, and education; and BC Vision, a comprehensive broadly supported economic development initiative that is growing to include housing and community development sectors.

Community Development continues to fund the Fair Housing Center of Southwest Michigan to conduct systemic Fair Housing investigations and community education. The results of Fair Housing investigations into discrimination in the real estate market resulted in new opportunities for relationship building between the City Commission's Human Relations Board, area pastors, the Fair Housing Center, the Center for Diversity and Innovation, and the Battle Creek Area Association of Realtors

Other consultations continued to expand the work of the Calhoun County Lead Poisoning Prevention Task Force to expand lead testing among children under age six, to create public understanding of the risks for lead poisoning, and to increase resources for lead remediation in housing build before 1978. The Calhoun County Public Health Department is a key partner in this effort. Many community partners have been involved in the Lead Task Force.

Consultations conducted for the 2022-23 Annual Action Plan

Affordable Housing

Winter 2021

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 would like to work with the Calhoun County Land Bank and the City to rehab vacant homes and create infill housing on vacant lots. Habitat is currently the City of Battle Creek's only Community Housing Development Organization (CHDO).

Weekly, 2021-22

Community Action Agency of Southcentral Michigan

Community Action is a key partner in the City's work around lead abatement. Community Action works in many adjacent counties. 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.

Weekly, 2021

Neighborhoods, Inc. of Battle Creek

The City continues to meet periodically with Neighborhoods, Inc. regarding housing needs. Neighborhoods, Inc. is the primary sub-recipient of the City's \$3.4 million HUD-funded Lead Hazard Control grant. Starting in 2021 city staff meet with Neighborhoods, Inc. to discuss program progress and emerging needs. Neighborhoods, Inc.'s homeless housing program is funded by the HUD Continuum of Care and is located in the Drop-In, day center for homeless people, the SHARE Center. This is 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. They are primary recipient of the City's CDBG-CV and HOME TBRA funds for the purpose of providing rent assistance and housing case management.

Education

March 2022

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 in March, discussion covered continued development of the Youth Village, the development of the early childhood center and New Level's work to create a CDC organization to oversee community engagement and development work.

Homelessness

Monthly, 2021-22

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.

Winter 2022 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. Indicated via survey that priority needs include removing housing barriers related to mental health and addiction.

January 2022 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 Haven of Rest Executive Director focused on changes seen in homeless services as a result of the COVID-19 pandemic. Changes include increased need for meals, addiction recovery services and increased length of stay in the shelter.

December 2021 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 CDBG-CV funding to BC Shelter to support operating costs. Consultation with shelter staff focused on the need for more shelter space for women and children, hotel vouchers, and transit vouchers.

Public Housing

Winter 2022 Battle Creek Housing Commission

As of March 2022, the Battle Creek Housing Commission owns and manages 320 public housing units, has budget authority for 793 Housing Choice Vouchers, and owns and manages 24 units of scattered site homeowner units. The Battle Creek Housing Commission has been an active partner in efforts to end homelessness. The Housing Commission has also worked with the Veterans Administration (VA) to administer the Jesse Houses and HUD-VASH Housing Choice Vouchers.

Monthly, 2021-22 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

January 2022 Charitable Union

Charitable Union indicated via survey that priority community needs include transportation, adequate number of shelter beds for women and families, supportive services for mental health, and access to children's services for families experiencing homelessness.

Quarterly 2021-22 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

Monthly, 2021-22

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.

Spring-Winter, 2022

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 need for continued awareness of available housing resources among Hispanic/Latinx population. VOCES receives a CDBG-CV funded case management grant to help bring awareness to this population.

January 2022

SAFE Place

SAFE Place is a Battle Creek's only domestic violence shelter. They provide emergency shelter, counseling, legal advocacy and children's programs. SAFE Place staff stated that finding housing for their clients after their stay at the shelter is difficult.

Other

January 2022

Willard Library

Willard Library indicated via survey that gaps in service delivery include case management and connecting second-chance tenants and landlords.

January 2022

Jill Anderson Grants

Indicated via survey that community needs include lack of affordable housing and need to strengthen NPCs.

January 2022

Café Rica

Indicated via survey that a main community need is increased housing and reintegration services for formerly incarcerated individuals.

February 2022

Calhoun County Broadband Task Force

Task force was created to assess broadband access in the county and develop a plan. The averaged download performance for Battle Creek is 56.16 Mbps which is under the state average of 160.6 Mbps. That said, the area has multiple wired Internet technologies to choose from including fiber and cable from several operators. The average Battle Creek household has five providers serving their street (22 providers operate within the City). Just 3.63% of Battle Creek area residents are limited to just one choice. Viaset and HughesNet provide near 100 percent coverage in the Battle Creek area. Xfinity is a third option covering 94% of the Battle Creek area, including 100% of CDBG LMI target areas and offers cable service with speeds up to 1,200 Mbs.

Monthly 2021-2022

Public Health Alliance Advisory Cabinet

The purpose of the PHA Advisory Cabinet is to evaluate data on the community's needs, advancing goals toward key indicators, through best practices, collaborations, and developing initiatives that promote improved and equitable health outcomes. Membership includes representatives from numerous healthcare providers, social service agencies, and local government officials representing Calhoun County, the cities of Battle Creek, Springfield, Marshall and Albion, and a number of the surrounding townships. Throughout the year a number of community needs were identified related to health equity; the impact of Covid-19 on low –income communities; vaccine outreach in LMI communities in Battle Creek and surrounding townships, Springfield and Albion; mental health outcomes throughout the county, including data disaggregated by race, ethnicity, sex, gender, and age.

February 2022

BCPD Emergency Services

Consulted regarding emergency services activities, emergency preparedness and emergency response planning in Battle Creek.

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, BC Vision, TRHT (Truth, Racial Healing, & Transformation), The Coordinating Council of Calhoun County, and the community policing efforts of the Battle Creek Police Department. 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 eight 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 have been suspended for much of the 2020-21 and 2021-22 program years, they are expected to resume meeting by the beginning of the 2022-23 program year.

The Coordinating Council (TCC) of Calhoun County was formed in 1989 at the direction of the State of Michigan to put funds and fiscal decisions in the hands of the local community. It coordinates local, state and federal program efforts. TCC oversees grant dollars, especially a wrap-around supportive services program providing case management to at-risk families; ensures collaborative efforts on the part of grantees; and decreases duplication of services and strengthens community programs/initiatives.

Members of the collaborative represent nonprofit, education, health, public safety, for-profit, grassroots, local businesses and community members. TCC members work collaboratively to positively impact community conditions in Battle Creek and Calhoun County. The City of Battle Creek is represented on TCC's leadership cabinet by the City Manager. TCC is also responsible for staffing Continuum of Care leadership.

In May of 2021, City staff convened the Battle Creek Housing and Community Development Roundtable. This three-hour roundtable focused on Battle Creek's Housing and Community efforts that includes support for more affordable housing options, equitable pathways to home ownership, and planning for neighborhood revitalization. Hosted by the City of Battle Creek, the roundtable was part of an U.S. Department of Commerce Economic Development Administration's supported Regional Economic Development Summit. Local action teams identified priority projects and focus areas and presented them to a group of federal, state, and local funders with the following goals:

- Identify federal, state, and local resources that can support the project
- Determine next steps and points of contact for each step
- Build coalitions and connections to help catalyze projects.

Federal and state agencies provided feedback and information about resources that could assist in catalyzing these projects. Represented agencies that presented project ideas or resources included New Level Sports, Calhoun County Land Bank Authority, Voces, Neighborhoods Inc. of Battle Creek, Trinity Community Center, Michigan State Housing Development Authority (MSHDA), U.S. Department of Agriculture (USDA), Administration for Children and Families (ACF), U.S. and Department of Housing and Urban Development (HUD).

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 collaborative 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. 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 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 Allovance 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 is being 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.

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 did not do any consultations around services for people with HIV/aids. There isn't an organization specifically addressing services for people with HIV/aids in Battle Creek. In the future an effort will be made to connect with organizations that provide these services. The City did had brief consultation with Michigan Works on workforce development and job placement, but this is an area of significant need due to the lack of construction contractors and will warrant additional consultation in the coming year.

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 partnered in the past year in the community development roundtable, 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 2022-23 Annual Action Plan included consultations with community stakeholders and four 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 2020-24 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 notice, 8/19/21, in the SHOPPER NEWS for the 2021 CAPER, publicizing the September 21, 2021 City Commission Public Hearing on the CAPER.	No comments received.	None.	
2	Public Hearing	Non-targeted/ broad community	Public Hearing on the CAPER at a regular City Commission meeting, September 21, 2021	No comments received.	None.	https://battlecreek.novusagenda.com/agendapublic/MeetingView.aspx?MeetingID=555&MinutesMeetingID=788&doctype=Agenda
3	Newspaper Ad	Non-targeted/ broad community	Notice of January 18, 2022 Public Hearing on community needs in the Shopper, a local newspaper, on December 30, 2021.	No comments received.	None..	

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 January 18, 2021.	Comments of support from local service providers - https://battlecreek.novusagenda.com/agendapublic/MeetingView.aspx?MeetingID=586&MinutesMeetingID=802&doctype=Minutes	None.	https://battlecreek.novusagenda.com/agendapublic/MeetingView.aspx?MeetingID=586&MinutesMeetingID=802&doctype=Agenda
5	Newspaper Ad	Minorities Non-targeted/ broad community	Notice of 2022-23 Proposed CDBG and HOME budget and the 4/19/2022 Public Hearing on proposed budget and 2021-22 Annual Action Plan published in the SHOPPER News, on 3/17/2022 and 3/31/2022; and the Spanish-language, New Opinion on 3/17/2022.	No comments received.	None.	
6	Public Hearing	Non-targeted/ broad community	4/19/2022 Public hearing on the proposed 2022-23 CDBG and HOME budget and 2022-23 Annual Action Plan at a regular City Commission meeting.	No comments received.	None.	https://battlecreek.novusagenda.com/agendapublic/MeetingView.aspx?MeetingID=589&MinutesMeetingID=-1&doctype=Agenda

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 included in 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	\$1,225,449	\$374,551	\$1,600,000	\$3,795,000	CDBG funds program delivery costs, code compliance, minor home repair, public service grants, rental rehabilitation.
HOME	Federal	Acquisition, Homebuyer assistance, New construction for ownership, TBRA	\$320,866	\$0	\$320,866	\$900,000	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, Battle Creek has qualified as a distressed community by Congress and has had its HOME match requirement reduced 50% from 25% to 12.5%. 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.

In 2022, HOME match will be in the form of “as is” housing units and volunteer hours contributed through the Acquisition/Development/Resale 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 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.

Discussion

Previous year funds from transit curb cut activities in 2020 (\$200,000) and 2021 (\$100,000) are being reallocated to the Early Childhood Development Facility activity in this action plan. The City anticipates the transit curb cut activities will be programmed in years four and five of the consolidated plan.

The Annual Action Plan and budget use estimated amounts during the citizen participation process. Once the City receives its allocation amounts from HUD, modifications will be made to the AAP in the following order:

If the allocation is less than estimated:

1. CDBG General Administration plus Neighborhood Planning will be capped at 20% of award.
2. HOME General Administration will be capped at 10% of award.
3. Minor Home Repair, Code Enforcement and Rent Rehab will be reduced in equal measure up to 20%.
4. HOME fund shortage will be taken from Infill Housing program.

If the allocation is more than estimated:

1. General Administration plus Neighborhood Planning will be capped at 20% of award.

2. HOME General Administration will be capped at 10% of award.
3. Housing Case Management - Eviction Diversion, and Vulnerable Populations will be increased up to \$60,000 and \$50,000 respectively.
4. Facility Improvement Early Childhood Development will be increased up to \$490,000
5. Remaining funds will be allocated to Minor Home Repair.
6. HOME fund Increase will be added first to TBRA up to \$70,000, then to Infill Housing Program.

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	2024	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: \$625,000 HOME: \$290,880	Rental Units Rehabbed: 3 Homeowner Housing Added: 1 Homeowner Housing Rehabbed: 49 DPA: 10 TBRA Households Assisted: 27

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
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Facilities Improvement	2022	2023	Non-housing Community Development	Post/Franklin Revitalization Area, Northcentral Revitalization Area	Better connect LMI neighborhoods to downtown; Reduce the effects of low income on life quality; Assemble properties for development in LMI areas; Help underserved groups access and use resources	CDBG: \$420,000	Persons Assisted: 160
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: \$110,000	Persons Assisted: 380

Table 51: Goal Descriptions

1	Goal Name	Attainable Housing
	Goal Description	This goal encompasses preserving current affordable housing, development 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.
3	Goal Name	Infrastructure Improvements
	Goal Description	This goal involves installing curb cuts and other accessibility improvements at transit stops within the CDBG target area to ensure that all stops are ADA accessible.
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 2022 Program Year, which runs from July 1, 2022 to June 30, 2023; the City of Battle Creek will allocate \$1,600,000 in CDBG funding and \$320,866,000 in HOME Investment Partnership funding. With CDBG funding it will provide General Administration, Strategic Planning, Code Enforcement in targeted low- and moderate-income areas, Minor Home Repair for exterior repairs, a new public early childhood development center in an LMI neighborhood, rental rehabilitation, housing case management, transit vouchers, 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	Rental Rehabilitation
6	Fair Housing Education and Case Management
7	Facility Improvement – Early Childhood Development
8	Transit Voucher Program
9	Housing Case Management – Eviction Diversion
10	Housing Case Management – Vulnerable Populations
11	General Administration (HOME)
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	Citywide Post/Franklin Revitalization Area Fremont/McKinley Revitalization Area North Central Revitalization Area Wilson/Coburn Revitalization Area Urbandale Revitalization Area
	Goals Supported	Attainable Housing Housing Code Enforcement Infrastructure Improvements 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 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	6/30/2023
	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 (45 households assisted), Transit Infrastructure improvements (600 low and moderate income people affected), Rent Rehab (4 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
	Funding	CDBG: \$135,000
	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	6/30/2023
	Estimate the number and type of families that will benefit	There is citywide benefit to activities conducted under strategic planning include implementing of 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.
3	Project Name	Code Enforcement
	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 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	6/30/2023
	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 will be impacted.
	Location Description	This activity will be undertaken within the five revitalization areas within the city.
	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.
4	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: \$450,000
	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	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	45 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 provides matching grant funds of up to \$5,000 for eligible, low-income homeowners to fix exterior Code Compliance orders to repair or other health and safety issues. Roofs are funded for replacement cost up to \$15,000. Most repairs are exterior or interior repairs of plumbing, mechanical, electrical, or accessibility issues such as handicap ramps or door modifications. For families unable to provide required match, assistance is available as a no interest, no payment loan payable upon transfer of the property.
5	Project Name	Rent Rehabilitation
	Target Area	Post/Franklin Revitalization Area Fremont/McKinley Revitalization Area North Central Revitalization Area Wilson/Coburn Revitalization Area
	Goals Supported	Attainable Housing
	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

	Funding	CDBG: \$175,000
	Description	This proposed project will provide funds to support the development or rehabilitation of quality rental housing for use by low and moderate income families. Rental projects will generally be limited to properties for which rental housing is the highest and best use. Projects will prioritized that increase the housing density and enhance the vibrancy of mixed use neighborhoods, providing housing that is walkably connected to shopping, parks, jobs, schools and other community.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Four low or moderate income households will benefit from improved rental housing units.
	Location Description	Projects will be focused downtown and along major corridors into downtown.
	Planned Activities	Provide staffing to carry out rental housing rehabilitation programs to undertake marketing, loan intake, processing, property inspections, cost estimating, contractor procurement, progress and final inspections, contractor pay requests, processing change orders and providing lead risk assessments and lead clearance when applicable.
6	Project Name	Fair Housing Education and Case Management
	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: \$25,000

	Description	This proposed project funds fair housing education and case management services 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	6/30/2023
	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/or case management services.
	Location Description	Services offered citywide.
	Planned Activities	This proposed project funds fair housing education and case management services 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.
7	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: \$420,000
	Description	This project will fund creation of an early childhood development center within the CDBG target area.
	Target Date	6/30/2023

	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 creation of an early childhood development center within the CDBG target area.
8	Project Name	Transit Voucher Program
	Target Area	Citywide
	Goals Supported	Public Service Grants
	Needs Addressed	Better connect LMI neighborhoods and downtown Reduce the effects of low income on life quality Help underserved groups access and use resources
	Funding	CDBG: \$15,000
	Description	This project will provide transit vouchers to individuals that are homeless or at risk of homelessness for whom transportation is a barrier to access supportive services or employment opportunities.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	250 low income individuals that are homeless or at risk of homelessness will be assisted.
	Location Description	Citywide

	Planned Activities	This project will provide transit vouchers to individuals that are homeless or at risk of homelessness for whom transportation is a barrier to access supportive services or employment opportunities.
9	Project Name	Housing Case Management – Eviction Diversion
	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: \$35,000
	Description	This activity will provide funds for a part-time case worker for an eviction diversion program for low and moderate income households. Case workers will provide legal assistance and make referrals for housing resources and services.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Fifty low or moderate income renters will benefit from the proposed activities.
	Location Description	Citywide
	Planned Activities	Case workers will provide legal assistance and make referrals for housing resources and services.
10	Project Name	Housing Case Management – Vulnerable Populations
	Target Area	Citywide

	Goals Supported	Attainable Housing Public Service Grants
	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	CDBG: \$25,000
	Description	This activity will provide funds for a part-time case worker to provide housing case management services to vulnerable populations identified in the City's CDBG-CV Affirmative Marketing Plan and Report which identified groups least likely to access needed housing resources in the city—with an emphasis on providing services to Hispanic and Latino families.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 40 households will benefit from case management services
	Location Description	Services will be offered city wide.
	Planned Activities	Housing case management, Spanish interpretation
11	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: \$21,000
	Description	The function of this City activity is to provide necessary staffing to develop, implement and monitor the overall performance of all HOME programs
	Target Date	6/30/2023
	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
12	Project Name	Infill Housing Program
	Target Area	Fremont/McKinley Revitalization Area Northcentral Revitalization Area
	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: \$170,880

	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	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Two 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.
13	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: \$70,000
	Description	This activity provides short term rental assistance (twelve months) to eligible low-income households experiencing a housing emergency.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit	Approximately 20 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.
14	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: \$50,000
	Description	This project provides down payment assistance to low and moderate income home buyers. Down payment assistance ranges from \$1000 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	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 5 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 \$1000 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	40
Wilson/Coburn Revitalization Area	15
Urbandale Revitalization Area	5
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.

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 2022-23, 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 will issue an RFP to procure a Community Housing Development Organization (CHDO) to construct two new build single-family homes in a CDBG Revitalization Area. 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. Housing case management will be provided to households facing eviction and to other vulnerable populations identified in the City's 2020 Affirmative Marketing Plan and Report conducted by Truth, Racial Healing, and Transformation (TRHT) of Battle Creek.

One Year Goals for the Number of Households to be Supported	
Homeless	15
Non-Homeless	136
Special-Needs	15
Total	166

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	20
Production of New Units	2
Rehab of Existing Units	49
Acquisition of Existing Units	5
Housing Case Management	90
Total	166

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 incentive for property owners to invest in these neighborhoods and is creating wealth-building opportunities for some low and moderate-income families.

The pandemic has created a crisis around renter housing stability and evictions, which is currently being addressed by State and local CDBG-CV funds.

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 elderly and disabled housing at Cherry Hill Manor and Kellogg Manor. The Housing Commission has budget authority for 793 Housing Choice vouchers. It also owns and manages 24 of remaining single-family homes available for homeownership in a lease- to- purchase program. The Housing Choice Voucher waiting list is 376 families. The Housing Choice Voucher Waiting List contains 305 families for Battle Creek, and 71 for Albion. 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.

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. Twenty-four single family homes are 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. All homes were constructed since 1990. 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 commissions housing stock is in good condition.

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

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

Battle Creek homeless providers do a quality job of providing services to people in need. Collaborative partnerships are strong. HMIS Reports providers in the Battle Creek Homeless Coalition served 1,192 homeless people in 2019: 154 families consisting of 177 adults and 264 children, for a total of 441 persons in families served. 757 individuals were served. In 2020-2021 this number fell to 732, but we are seeing an increase in numbers again as pandemic conditions continue to change. Shelters are operating at full capacity and there is an increasing need for shelter space for women and families.

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. 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 offers certified peer support specialists, and recovery coaches who 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. The SHARE Center also houses Neighborhoods, Inc's Housing program. Staff at shelters engages people in services and help find housing. The H.O.P.E Team, a homeless outreach program of the Haven, works with church groups and the Salvation Army every other month to

distribute items like sack lunches, bottles 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.

Battle Creek has a number of 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. The ARK run by Catholic Charities in Kalamazoo also conducts monthly outreach to homeless and runaway youth.

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. HMIS data shows that nearly one third of people experiencing literal homelessness in Battle Creek are families, with many families having children under the age of 17.

There is a continuing need for case management to help people connect to housing, employment and services. This 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.

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. Homeless people can seek housing assistance from Neighborhoods, Inc of Battle Creek located in the SHARE Center. A housing counselor will work with a family or individual to see if they qualify for available housing assistance. The SHARE Center has peer mentors that help people to work through their crisis. 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 LatinX/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.

As part of the Consolidated Plan strategy, the City of Battle Creek will run a Tenant-Based Rental Assistance (TRBA) program to provide rental assistance to individuals facing eviction. Additionally, the City of Battle Creek will fund case management positions at local partners to help those experiencing housing insecurity navigate the resources available.

As part of the City's code enforcement activities, Battle Creek will be strengthening the numbers to registered rentals to increase the safety and quality of rental housing in its neighborhoods during the program year.

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 and 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.
- MSHDA CERA funds to alleviate pandemic-related hardships related to rent, utilities, and internet. The CERA program is made to reduce burdens caused by COVID-19 such as: reduction of income, increased household expenses, unemployment, and those who are at risk of homelessness or housing instability due to past due rent or utility payments.

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. Integrated Health Partners provided medical case management and follow-up to frequent users of emergency rooms. Work needs to be done with all of these organizations to provide greater homeless prevention services.

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 to 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. A number of 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 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, and 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 2020 Assessment of the 2014 Fair Housing Action Plan assesses the outcomes and impact of the earlier plan, identifies areas where impediments remain, and proposes next steps.

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. In fact, in the case of new housing development, the City is currently subsidizing the cost of services because the cost to the City is greater than the development fees charged.

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 2016; part of this review included research and recommendations for housing development and redevelopment, including the availability of diverse housing options and affordability levels

Discussion:

The City's most recent AI noted the following impediments:

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 homelessness 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 2021-2024 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

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 two 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 2021. Anecdotal data suggests that rents in Battle Creek have increased significantly more since the fall of 2021 when the eviction moratorium was lifted.

The City offers Minor Home Repair to help sustain low and moderate income homeowners in their 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 ideal living situation.

A number of 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), Habitat for Humanity, and Washington Heights UMC's 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 2022 for infill housing proposals using HOME funds.

The City Manager's office has been taking the lead on facilitating a permanent supportive housing development in Battle Creek by recruiting developers and building consensus in the community for a location. Recently a group of fifteen community leaders traveled to Gary, Indiana to do a site visit at a successful permanent supportive housing development. The group included members of the Homeless Coalition, the Battle Creek Housing Commission and elected officials. This effort along with other efforts to facilitate new multifamily affordable housing development is expected to continue through the coming program year.

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 2021 program year. The Lead Safe Program is an 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 for 42 months and began in January of 2021. 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. Neighborhoods, Inc. (NIBC) 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.
- Transit vouchers will be offered to reduce the impact of low income on the quality of life
- 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 is working 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

In 2019, the City of Battle Creek hired PFate and Associates LLC to assess the housing and community development delivery system in Battle Creek. The 92 page report covers the current housing market, community development ecosystem conditions, strengths and gaps in the city's housing and neighborhoods strategies, national best practices for creating vital cities, the state of nonprofit capacity and identification of opportunities for expanded impact, and recommendations for strengthening the ecosystem and building a more vital community. The report can be found online at: <http://battlecreekmi.gov/181>.

The primary focus in the coming year will be 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. However, the report found that the system would benefit from the presence of one or more housing development organizations with a social enterprise ethos, organizations that are both mission driven and business-like, with the ability to attract and deploy new capital and work at scale.

The City's work to identify or help create this organization or organizations is ongoing. By bringing on NIBC as a partner in its HUD lead grant, the City is intentionally helping to rebuild the organizations construction management capacity. The city is involved in talks with a couple other community organizations on housing strategies that would feature increasing the capacity of another housing organization to do this work or the creation of a new housing development agency.

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 Coordinating Council of Calhoun County, the Homeless Coalition, the Lead Task Force, and the Truth, Racial Healing, and Transformation Initiative. 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(l)(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(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use, 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 only funds HOME eligible activities as listed in CFR 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 Consolidated plan 2020-2024 and in the City of Battle Creek's HOME Policies and Procedures.

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.

Citizen Participation: Summary of the Public Engagement

To be added before submission to HUD upon completion of the public engagement process.