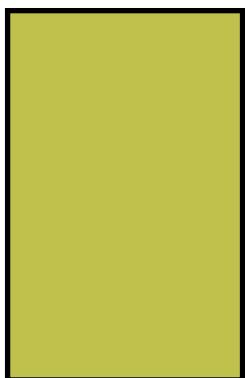


City of Battle Creek 2021 Annual Action Plan



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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 2019-2020 Program Year the City funded code enforcement, general administration and strategic planning, minor home repair, homeowner rehabilitation, acquisition/development/resale, 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.

Some of the activity outcomes include:

- Code Compliance completed 1,906 enforcements within CDBG target areas, addressing blight, health and safety issues related to housing.
- Code Compliance issued 37 vouchers for free paint to property owners with peeling paint violations (funded with local resources).
- Code Compliance completed 68 new enforcements on vacant, abandoned or dangerous buildings in CDBG target areas. Roughly 400 vacant or abandoned buildings were monitored monthly during the program year.
- Code Compliance completed 637 rental inspections in CDBG target areas.
- The City's Minor Home Repair program completed 65 projects for low and moderate income home owners.
- The City's HOME Homeowner Rehab program completed construction on two projects in a targeted area in the North Central Neighborhood Planning Council (NPC).
- Habitat for Humanity completed a HOME-funded rehabilitation and sale of a property in the Post/Franklin CDBG target area to a low-income first time homebuyer.
- The City's CHIP Medicaid-funded Lead Safe Program completed full lead abatement of 21 residential units.
- Worked with community partners to created a 10 page homebuyers guide as a response to an ask from the African American community to provide better information about the home buying process. Available at: www.battlecreekmi.gov/566
- Worked with community partners to hold a community forum on housing and segregation at New Level Sports in February with over 50 participants. The forum promoted the home buyer guide and

was used to gather input and data for the City's Consolidated Plan and the Beyond Separation strategic plan.

- The Fair Housing Center of Southwest Michigan conducted 9 city-funded fair housing trainings that resulted in 74 individuals being trained on fair housing rights.
- Staff created a 2019 Fair Housing Report which chronicled four years of Fair Housing work in Battle Creek using source documents and narrative collected from City staff activities, Fair Housing Center trainings, systemic investigations, and events; Human Relations Board community engagement sessions; and TRHT events and initiatives. The report is available online at: www.battlecreekmi.gov/566
- Staff worked with Post/Franklin NPC members to develop a housing intervention strategy for the Post/Franklin CDBG Target Area. The planning process used the city's Neighborhood Intel system (<https://mi-battlecreek.dynamo.city>) to do analysis of neighborhood conditions, identify vulnerable populations and determine which intervention ideas would have the greatest impact. Information about housing resources from five different programs were distributed to 450 households, including the City's Lead Safe, Minor Home Repair, Paint Voucher programs. Each household was sent a mailer and visited door-to-door by volunteers from the BC Police Department, city staff, the Neighborhood Planning Council, and local churches.
- The City of Battle Creek's Parks and Recreation facility, Full Blast, hosted and City staff helped organize the 2019 Homeless Health Fair and VA Stand Down attended by over 500 homeless individuals.
- In response to the COVID crisis, the City converted its Full Blast recreational facility into a temporary homeless shelter to meet the additional demand for socially distanced shelter.
- Contracted with Truth, Racial Healing, & Transformation to create an affirmative marketing plan for the City and its CDBG-CV grantees to ensure access to pandemic response resources for groups with barriers or those least likely to have access.

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 summer or fall of 2021. Likewise public hearings for community needs, the yearly budget, the Annual Action Plan and the CAPER have been virtual.

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 2021 budget and Annual Action Plan is scheduled for the April 24, 2021 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 2020-21 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**. There were no public comments during the scheduled public hearing.

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 March or 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 Specialist, 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

Chris Lussier

Manager

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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 that has grown to over 50 participants; 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 2021-22 Annual Action Plan

Affordable Housing

Education

March 2021

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, 2020-21

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.

February, 2021

SHARE Center

SHARE Center and Cafe-Can-Do receive community mental health funding through a contract with Summit Pointe. The SHARE Center is also 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. Community Development staff consulted with the Executive Director regarding homeless needs and supportive services.

Public Housing

Fall 2019

Battle Creek Housing Commission

As of March 2020, the Battle Creek Housing Commission owns and manages 345 public housing units, has budget authority for 793 Housing Choice Vouchers, and owns and manages 25 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, 2020-21

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.

Supportive Services

November, 2020

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.

September, 2020

Fair Housing Center

The Fair Housing Center of Southwest Michigan is a non-profit organization that provides fair housing services throughout nine counties of Southwest Michigan. Services include providing complaint and intake services to residents who believe they've been the victims of housing discrimination and education and outreach on fair housing issues to local governments, housing developers, housing managers, and others to promote compliance with federal fair housing laws. Fair Housing Center staff were consulted regarding fair housing priorities and to discuss fair housing activities in Battle Creek.

Fall, 2020

Urban League

Urban League specializes in developing relationships with Battle Creek's African American youth. It runs seven direct service programs, promoting education and youth leadership for at-risk and disadvantaged young people. Being physically located next to Battle Creek Central High School helps their outreach to and enrollment of young people. The Urban League is a great resource for engaging African American youth in the City.

Community Development staff have regularly consulted with the Urban League over the past year. These consultations have largely focused on racial equity and housing issues and have led to collaborative projects that include a number of racial equity events (men's group discussion, movie night, etc.) and the creation of a local home buyer's guide.

January, 2021

City of Battle Creek Transportation

Community Development staff met with Mallory Avis, Public Transit Director for City of Battle Creek to follow up on discussions in 2020 related to transportation needs identified in the public process for the Consolidated Plan. The discussion focused on how needs have changed due to the pandemic. Topics discussed included accessibility improvements to transit stops to ensure ADA compliance, and the need for transit passes for vulnerable populations including those who are homeless, recently homeless, victims of domestic violence, extremely low-income, disabled,

unemployed, and newly employed.

Special Populations

Spring-Fall, 2020

The Burma Center

The Burma Center was established in 2011 to serve as a community center for the growing Burmese immigrant population in the adjoining Cities of Battle Creek and Springfield. There are approximately 1,700 Burmese people living in the Battle Creek area. Burmese immigrants find Battle Creek calm and find opportunities for employment in meat packing in Plainwell and manufacturing jobs at the Fort Custer industrial park. Community Development staff consulted the Burma Center about how to best engage the Burmese population in the public engagement process, and to discuss barriers to accessing housing resources during the pandemic.

Spring-Winter, 2020

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.

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(l)).

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 program year, they are expected to resume meeting by the beginning of the 2021-21 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.

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.

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 Consolidated Plan. The consultations included separate meetings with the Director of the Continuum of Care, the Housing Solutions Board, the Executive Director of the SHARE Center. 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 economic development. This was largely due to the pandemic which limited face to face meetings and required that staff time be prioritized around housing needs and homelessness prevention.

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 works in partnership with Calhoun County, especially the Calhoun County Land Bank Authority, and the statewide housing and community development authority, the Michigan State Housing Development Authority (MSHDA) and the Michigan Department of Housing and Human Services (MDHHS).

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 2021-22 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, 12/10/20, in the SHOPPER NEWS for the 2020 CAPER, publicizing the December 15, 2020 City Commission Public Hearing on the CAPER.	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)
2	Public Hearing	Non-targeted/broad community	Public Hearing on the CAPER at a regular City Commission meeting, December 15, 2020	No comments received.	None.	https://battlecreek.novusagenda.com/agendapublic/DisplayAgendaPDF.ashx?MinutesMeetingID=622
3	Newspaper Ad	Non-English Speaking - Specify other language: Spanish	Notice of February 16, 2021 Public Hearing on community needs in the New Opinion, a local Spanish-language newspaper, on February 4, 2021.	No comments received.	None.	
4	Newspaper Ad	Non-targeted/broad community	Notice of February 16, 2021 Public Hearing on community needs in the Shopper, a local newspaper, on February 4, 2021.	No comments received.	None..	
5	Public Hearing	Non-targeted/broad community	Public hearing on housing and community development needs at a regular City Commission meeting on February 16, 2021.	No comments received.	None.	https://battlecreek.novusagenda.com/agendapublic/MeetingView.aspx?MeetingID=541&MinutesMeetingID=760&doctype=Minutes

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Comments not accepted	URL (If applicable)
6	Newspaper Ad	Minorities Non-targeted/ broad community	Notice of 2021-22 Proposed CDBG and HOME budget and the 4/20/2021 Public Hearing on proposed budget and 2021-22 Annual Action Plan published in the SHOPPER News, on 4/1/2021 and 4/8/2021; and the Spanish-language, New Opinion on 4/1/2021.	No comments received.	None	
12	Public Hearing	Non-targeted/ broad community	4/20/2021 Public hearing on the proposed 2020-21 CDBG and HOME budget and 2020-21 Annual Action Plan at a regular City Commission meeting.	No comments received.	None	https://battlecreek.novusagenda.com/agendapublic/DisplayAgendaPDF.ashx?MeetingID=545

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	\$1,258,189	\$48,448	\$1,306,637	\$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	\$302,362	\$0	\$302,362	\$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 2021, 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. Infill development is called for in the plan in years two through five.

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: \$645,000 HOME: \$272,023	Household Housing Units: 51 Households Assisted: 30

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	Infrastructure Improvements	2020	2021	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; Help underserved groups access and use resources	CDBG: \$100,000	Persons Assisted: 600
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: \$100,000	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 2021 Program Year, which runs from July 1, 2021 to June 30, 2022; the City of Battle Creek will receive \$1,258,189 in CDBG funding and \$302,247 in HOME Investment Partnership funding. With CBDG funding it will provide General Administration, Strategic Planning, Code Enforcement in targeted low- and moderate-income areas, Minor Home Repair for exterior repairs, new ADA accessible curb cuts for transit stops in LMI neighborhoods, 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 Administration
5	Housing Rehabilitation Minor Home Repair
6	Rental Rehabilitation Administration
7	Rental Rehabilitation
8	Fair Housing Education and Case Management
9	Transit Infrastructure Program
10	Transit Voucher Program
11	Housing Case Management – Eviction Diversion
12	Housing Case Management – Vulnerable Populations
13	General Administration (HOME)
14	Infill Housing Program
15	Tenant-Based Rental Assistance
16	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	6/30/2022
	Estimate the number and type of families that will benefit from the proposed	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: \$141,637
	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	6/30/2022
	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 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	6/30/2022
	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.
	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 Administration
	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 Improve property conditions in LMI neighborhoods
	Funding	CDBG: \$94,000
	Description	Provide staffing to carry out 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.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit	Housing Rehabilitation Administration oversees the Minor Home Repair program which will serve 45 households during the program year, inspections for HOME funded rehabilitation projects and the administration of previously funded rehabilitation projects.
	Location Description	The Housing Rehabilitation and Minor Home Repair program is offered citywide including the five target revitalization areas.

	Planned Activities	Provide staffing to carry out 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.
5	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: \$376,000
	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	6/30/2022
	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.
6	Project Name	Rental Rehabilitation Administration
	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: \$15,000
	Description	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.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit	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.
7	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: \$160,000
	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 prioritize 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	6/30/2022
	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.
8	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	6/30/2022

	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.
9	Project Name	Transit Infrastructure Program
	Target Area	All Five Revitalization Areas
	Goals Supported	Infrastructure Improvements
	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: \$100,000
	Description	This project will install curb cuts and other accessibility improvements at transit stops within the CDBG target area to ensure that all stops are ADA accessible.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	600 individuals will be affected by the improvements at transit stops
	Location Description	Improvements will be made at transit stops within the five CDBG Revitalization Target Areas.
	Planned Activities	This project will install curb cuts and other accessibility improvements at transit stops within the CDBG target area to ensure that all stops are ADA accessible.
10	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	HOME: \$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	6/30/2022
	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.
11	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	HOME: \$25,000

	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	6/30/2022
	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.
12	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	HOME: \$35,000
	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	6/30/2022
	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

13	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: \$30,224
	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	6/30/2022
	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

14	Project Name	Infill Housing Program
	Target Area	Fremont/McKinley Revitalization Area Northcentral Revitalization Area
	Goals Supported	Attainable Housing

Needs Addressed	<p>Increase access to affordable housing</p> <p>Reduce the effects of low income on life quality</p> <p>Reduce areas of concentrated poverty</p> <p>Help underserved groups access and use resources</p> <p>Improve property conditions in LMI neighborhoods</p>
Funding	HOME: \$140,000
Description	This activity will provide gap funds for acquisition, development, and sale of infill new build 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	6/30/2022
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.
15	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	CDBG: \$32,023
	Description	This activity provides short term rental assistance (three to six months) to eligible low-income households experiencing a housing emergency.
	Target Date	6/30/2022
	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 engaged in a service program to be stable in safe, quality housing.

16	Project Name	Down Payment Assistance
	Target Area	Citywide
	Goals Supported	Attainable Housing
	Needs Addressed	<p>Increase access to affordable housing</p> <p>Reduce the effects of low income on life quality</p> <p>Reduce areas of concentrated poverty</p> <p>Help underserved groups access and use resources</p>
	Funding	CDBG: \$100,000
	Description	<p>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</p>
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 10 households will benefit from first month rent and security deposits.
	Location Description	This activity will assist low and moderate income families citywide.
	Planned Activities	<p>Down payment assistance ranges from \$1000 to \$10,000 based on need.</p> <p>Assistance will be offered in conjunction with other programs like fair housing education and home buyer education</p>

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	20
North Central Revitalization Area	25
Wilson/Coburn Revitalization Area	15
Urbandale Revitalization Area	10
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 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 2021-22, 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	141
Special-Needs	15
Total	171

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	10
Housing Case Management	90
Total	171

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 low or falling home values, which make the repair of older homes cost prohibitive. Hence, Battle Creek has an oversupply of older homes in poor repair and a large number of vacant buildings. 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 345 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 25 of remaining single-family homes available for homeownership in a lease- to- purchase program. The Housing Choice Voucher waiting list is 157 families. The Housing Choice Voucher Waiting List contains 7 families for Battle Creek, and 18 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 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-five 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-five 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.

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 Summit Pointe'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 need of people. 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 Summit Pointe Housing 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 have families and individuals obtain a regular income to pay for housing and to access community resources to help prevent further episodes of homelessness. 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.

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

The four 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; and Summit Pointe Housing, the Housing Access Resource Agency (HARA) for Calhoun County, which provides eviction prevention services and help for homeless people to find housing. Summit Pointe Housing also manages 12 units of permanent supportive housing. Summit Pointe Housing 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).

- 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 (\$45,037).
- 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 (\$72,865).
- MSHDA ESG Homeless Management Information System (HMIS) funding provides data management support (\$2,650).
- HUD Continuum of Care funding for the Homeless Housing Assistance Project funds security deposits up to \$350 for people who are homeless and diagnosed with a serious mental illness (\$19,607).
- HUD Continuum of Care funding for Permanent Supportive Housing PSH (\$63,647) and Permanent Supportive Housing PSH-2 (\$66,236) projects are used to provide permanent housing solutions for chronically homeless individuals.

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. This 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 City will issue an RFP to procure a consultant to update its Analysis of Impediments to Fair Housing in 2021.

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 2020-21 program year. Housing is relatively affordable in Battle Creek (compared to other comparable communities). The condition and safety of housing affordable to those with low-income is a great concern and is the reason behind requiring rentals to be inspected and registered with the city.

The most common housing problem for low-income people is severe housing cost burden which means residents pay more than 50% of their household income for rent and utilities. According to the U.S. Census, approximately 2,245 renters and 1,260 homeowners in Battle Creek are severely housing cost burdened. Efforts to enhance resident's ability to find and keep employment such as the EDGE job training program and the BC Vision economic development plan will be supported.

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:

- BC Vision, a community collaborative funded by the W.K. Kellogg Foundation and the Kellogg Company to develop an economic development plan to expand jobs, talent development and a culture of vitality.
- 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

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(l)(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. Subrecipients 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: Under the resale option, 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.

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

The seller's fair return on investment is limited by the 1) City's fair return formula, described below; and 2) the area housing market value. Appreciation realized during the term of home ownership may be shared between the homeowner and the City.

The fair return on investment will equal the sum of 1) the amount of the homeowner's investment, and 2) the amount of the standardized appreciation value, less any investment by the City required at the time of resale to enable the property to meet local housing code. The homeowner's investment is calculated by adding the down payment made by the homeowner during the period of ownership, and the value of the mortgage principal repaid by the homeowner during the period of ownership and the value of any improvement installed at the homeowner's expense. The standardized appreciation value will equal three percent of the original purchase price for each year the homeowner holds title to the property, calculated as one-quarter percent per month.

The homeowner/seller will receive the full amount of the fair return on investment only if sufficient sale proceeds remain after all outstanding debt (excluding the repayable HOME subsidy), closing costs, and housing code required repairs are paid off. Any sale proceeds remaining after payment of outstanding debt, closing costs, housing code required repairs, fair return, and repayment of the remaining pro rata share of the HOME subsidy will be shared 50/50 between the homeowner and

the City. If necessary, the City will use its share for the purposes of reducing the monthly payment to an affordable level for the subsequent low- to moderate-income purchaser.

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.

