August 13, 2024

2024-2028 FIVE-YEAR CONSOLIDATED PLAN AND 2024 ANNUAL ACTION PLAN FOR CDBG PROGRAM

As Approved by U.S. Department of Housing & Urban Development







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Executive Summary

ES-05 Executive Summary

INTRODUCTION

The City of Traverse City, MI has completed the planning process for the 2024/2025-2028/2029 Five-Year Consolidated Plan (Consolidated Plan) as required by the U.S. Department of Housing and Urban Development (HUD). The purpose of the Consolidated Plan is to identify goals, objectives, and strategies for addressing housing and community development needs, including those of the homeless and other special needs populations. The Consolidated Plan guides the use of city resources to address these needs over a five-year period. As a new entitlement community, Program Year (PY) 2024 will be the City's first annual allocation of approximately \$365,323 in Community Development Block Grant (CDBG) funds.

The Consolidated Plan is developed in a manner specified by HUD, and the City has followed the prescribed format in completing the plan. The Consolidated Plan was developed using HUD and U.S. Census data for demographics and housing, surveys, input from public meetings, meetings with internal departments, and City Commission meetings. During the planning process, the City conducted public meetings with citizens and stakeholders, an online survey, consultation with nonprofit groups, and multiple public meetings. The purpose of this process was to receive citizen input on the current housing and community development needs of the city.

There are four HUD-defined categories of need prescribed for the Consolidated Plan: Housing, Homelessness, Non-Housing Community Development and Non-Homeless Special Needs. The Consolidated Plan process requires the City of Traverse City to identify priority needs for each category and prepare an Annual Action Plan to address those priorities. For every priority, there are goals and strategies established to measure progress. The citizen input was critical in developing the goals and strategies of this Consolidated Plan.

This Consolidated Plan not only presents goals to address the priority needs of the City, but also to address the statutory goals established by Federal law:

Decent Housing:

- Assist homeless persons to obtain affordable housing.
- Assist persons at risk of becoming homeless.
- Retain affordable housing stock.
- Increase the availability of affordable housing in standard condition to low- and moderate-income families, particularly to economically disadvantaged persons (and without discrimination on the basis of race, creed, religion, color, age, sex, marital status, familial status, national origin, disability, gender identity or sexual orientation).
- Increase the supply of supportive housing which includes structural features and services to
 enable persons with special needs (including persons with HIV/AIDS) to live in dignity and
 independence.
- Provide affordable housing that is accessible to job opportunities.

A Suitable Living Environment:

• Improve the safety and livability of neighborhoods Increase access to quality public and private facilities and services.

Expanded Economic Opportunities:

- Job creation and retention for low-income persons.
- Availability of mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices.
- Empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing.

SUMMARY OF THE OBJECTIVES AND OUTCOMES IDENTIFIED IN THE PLAN NEEDS ASSESSMENT OVERVIEW

The Five-Year Consolidated Plan identifies four (4) goals, along with corresponding strategies, to address the City's housing and community development needs. These goals are summarized as follows:

Goal: Housing

Assist with the construction and rehabilitation of affordable housing, and lower economic barriers to such housing, for low- and moderate-income households, seniors, and persons experiencing homelessness.

Goal: Homelessness

Support shelters and services for persons experiencing homelessness or persons at-risk of homelessness.

Goal: Community and Economic Development

Support community and economic development projects and services, including but not limited to public facility or infrastructure improvements and social services, in qualifying low- and moderate-income areas.

Goal: Non-Homeless Special Needs

Support the needs of the community's aging population by improving the accessibility of housing, public facilities, and services for seniors and persons with disabilities.

EVALUATION OF PAST PERFORMANCE

As this is the City's first Consolidated Plan, this section is not applicable.

SUMMARY OF CITIZEN PARTICIPATION PROCESS AND CONSULTATION PROCESS

Comments and concerns raised during the citizen participation process were taken into consideration when developing the Consolidated Plan's goals and strategies. The Consolidated Plan is a collaborative

process that involves interviews with stakeholders and meetings with the public to determine areas of need. As part of this process, the City sought to identify the priority needs and strategies to address those needs. Priority needs were identified based on available housing data, public input obtained using an online survey, public meetings, and stakeholder consultation. In addition, the City consulted with the Greater Grand Traverse Area Continuum of Care, city departments, and the City Commission to identify priority needs and develop corresponding strategies.

SUMMARY OF PUBLIC COMMENTS

Based on input and data received through an extensive citizen participation process, the following summarizes the public comments:

Comments Regarding Community Needs

Although there are many issues that the public felt are important, there are a few items that were stressed throughout the public process as being of the highest priority:

- Affordable housing construction
- Housing rehabilitation
- Housing services
- Aging in place (e.g., housing-related ADA compliance and accessibility improvements)
- Senior center improvements
- Homeless shelters (day and night)
- Supportive services, including mental health services

SUMMARY OF COMMENTS OR VIEWS NOT ACCEPTED AND THE REASONS FOR NOT ACCEPTING THEM

All comments received by the City of Traverse City were considered and are, generally or specifically, addressed by the Strategic Plan and/or Annual Action Plan. Documentation of all comments received is included as an attachment (PDF format) to the Five-Year Consolidated Plan submittal.

SUMMARY

The Five-Year Consolidated Plan for years 2024/2025-2028/2029 identifies goals and strategies to address the City's housing and community development needs. These needs were identified through a citizen participation process that involved residents, service providers, City staff, elected officials, and

other community partners. The Consolidated Plan guides the City's use of CDBG resources through four (4) goals. These goals are summarized as Housing, Homelessness, Community and Economic Development, and Non-Homeless Special Needs. Over the next five years, the City will deliver CDBG-funded projects through housing programs and related assistance, public improvements, and coordinated partnerships with an array of housing, homeless, and public service providers.



PR-05 Lead & Responsible Agencies

AGENCY/ENTITY RESPONSIBLE FOR PREPARING/ADMINISTERING THE CONSOLIDATED PLAN

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

TABLE 1: RESPONSIBLE AGENCIES

Agency Role	Name	Department/Agency
Lead Agency	The City of Traverse City, MI	Planning and Zoning Department
		•

Table 1 - Responsible Agencies

NARRATIVE

The City of Traverse City, MI is the lead agency responsible for overseeing the development of the Five-Year Consolidated Plan and Annual Action Plan. The Planning and Zoning Department is the internal department that is responsible for the day-to-day administration of CDBG funding.

The development of the 2024/2025-2028/2029 Consolidated Plan and Annual Action Plan was based on public input, internal discussions, and other studies, plans, and reports that have been prepared in recent years. Some of the primary documents included the City of Traverse City Master Plan (amended 2017), Five Year Parks and Recreation Master Plan 2021 – 2026, Traverse City Public Participation Plan, and various Greater Grand Traverse Area Continuum of Care (CoC) data and reports, among others.

To maximize citizen participation, staff conducted outreach through a series of public notices, online survey, public meetings, and public hearings. As part of these efforts, low- and moderate-income residents, as well as service providers, were encouraged to provide input on the Consolidated Plan and Annual Action Plan.

CONSOLIDATED PLAN PUBLIC CONTACT INFORMATION

Inquiries, comments, or complaints concerning the Consolidated Plan, any amendments, or performance reports, can be conveyed by contacting City staff at:

The City of Traverse City

Planning and Zoning Department

400 Boardman Avenue

Traverse City, MI 49684

Telephone: (231) 922-4778

<u>Isickterman@traversecitymi.gov</u>

Business hours: 8:00 a.m. – 4:00 p.m., Monday through Friday.

Complaints and related comments on the programs may also be offered at the public hearings. Written responses to all written complaints may also be made to the Detroit Field Office of the U.S. Department of Housing and Urban Development (HUD) at the following address:

U.S. Department of Housing and Urban Development

Community Planning and Development Division

Detroit Field Office

McNamara Federal Building

477 Michigan Avenue

Detroit, MI 48226

Phone: 313-226-7900

Fax: 313-226-5611

TTY: 313-226-6899

PR-10 Consultation

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

Institutional coordination of the Consolidated Plan establishes a unified vision for community development. The City plans to use a collaborative process to shape various programs into effective, coordinated strategies. This process also facilitates the opportunity for planning and citizen participation to take place in a comprehensive context, attempting to reduce duplication of effort at the local level.

The City will execute this Consolidated Plan in harmony with public, private, and nonprofit agencies. Nonprofit agencies may include, but are not limited to, service providers and community housing development organizations. Private sector partners may include, but are not limited to, local financial institutions, developers, and local businesses.

Table 2 outlines the types of agencies and organizations consulted through the development of the Consolidated Plan and Annual Action Plan.

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 City coordinated with the Greater Grand Traverse Area Continuum of Care (CoC) through data from the Northwest Michigan Coalition to End Homelessness. This consultation was pivotal in preparing the Needs Assessment and Strategic Plan components of the Consolidated Plan.

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

The City of Traverse City does not receive or administer an Emergency Shelter Grant (ESG). Consultation with the Continuum of Care (CoC) included research with Greater Grand Traverse Area Continuum of Care documents and plans, and public hearings and notices. The Greater Grand Traverse Area Continuum of Care, the area's CoC, assists in the operation and administration of the region's Homeless Management Information System (HMIS).

The City of Traverse City consulted with the Greater Grand Traverse Area Continuum of Care agencies to identify homeless needs. The Greater Grand Traverse Area Continuum of Care (CoC) Coalition has been working collaboratively in the region to provide seamless services to individuals and families who are homeless or at-risk of homelessness.

TABLE 2: AGENCIES, GROUPS, ORGANIZATIONS AND OTHERS WHO PARTICIPATED IN THE PROCESS AND CONSULTATIONS					

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Greater Grand Traverse Area Continuum of Care – Goodwill of Northern Michigan	Services-Homeless; Continuum of Care	Homeless Needs Assessment, Homelessness Strategy	Consultation/Data and Reports; Identification of Need
Grace Episcopal Church Day Shelter - Jubilee House	Services-Homeless	Homeless Needs Assessment, Homelessness Strategy	Attended Public Meeting; Consultation through Reports/Websites.
Traverse City Police Department	Other Government - Local	Non-Homeless Special Needs	Attended Public Meeting; Consultation through Reports/Websites.
Traverse City Departments	Grantee Department	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; Market Analysis; Non-Housing Community Development Strategy; Anti-Poverty Strategy; Lead-Based Paint Strategy	Attended Public Meeting; Consultation through Reports/Websites.
Northwest Michigan Coalition to End Homelessness	Services-Homeless	Homeless Needs Assessment, Homelessness Strategy	Attended Public Meeting; Consultation through Reports/Websites.
Homestretch	Housing	Housing Needs Assessment	Attended Public Meeting; Consultation through Reports/Websites.
Grand Traverse County	Other Government - County	Non-Housing Community Development Strategy	Attended Public Meeting; Consultation through Reports/Websites.
Northern Michigan Community Action Agency	Housing; Services Children; Services – Health; Services – Education; Services - Employment	Housing Needs Assessment; Non- Homeless Special Needs; Market Analysis; Non- Housing Community Development Strategy; Anti-Poverty Strategy	Attended Public Meeting; Consultation through Reports/Websites.
Housing North	Housing	Housing Needs Assessment	Attended Public Meeting; Consultation through Reports & Websites.
Traverse City Housing Commission	Public Housing Authority	Public Housing Needs	Attended Public Meeting; Consultation through Reports/Websites.
Safe Harbor of Grand Traverse	Services-Homeless	Homeless Needs Assessment, Homelessness Strategy	Attended Stakeholder Meeting; Consultation through Reports/Websites.

Table 2 – Agencies, groups, organizations who participated

IDENTIFY ANY AGENCY TYPES NOT CONSULTED AND PROVIDE RATIONALE FOR NOT CONSULTING

Not applicable. The City did not exclude any specific agency types. The City also invited representatives the Human Rights Commission and Northern Lakes Community Mental Health who chose not to attend the stakeholder meetings.

TABLE 3: OTHER LOCAL/REGIONAL/FEDERAL PLANNING EFFORTS

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?		
10-Year Plan to End Homelessness	Greater Grand Traverse Area Continuum of Care	Identification of Need, Goals related to Homelessness		
The City of Traverse City Master Plan	The City of Traverse City	Identification of Public Needs		
Various Department Reports	The City of Traverse City Government Departments	Identification of Need, Goals related to Community Development		

Table 3 – Other Local/Regional/Federal Planning Efforts

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))

When applicable the City will partner with local non-profit community agencies. The City may also work with local developers to support the goals of the provision of affordable, safe, and sanitary housing; a suitable living environment, and expanded economic opportunities for low- and moderate-income persons within the City.

These services are provided through partnerships with government and quasi-government agencies, as well as respective planning efforts shown in **Table 3**. The City of Traverse City will encourage building partnerships between governments, lenders, builders, developers, real estate professionals, and advocates for low-income persons. The City of Traverse City will work with the social service providers and other community groups to promote the development of affordable housing and related housing services.

NARRATIVE

Many of the programs and activities that will be carried out by the City during the next five (5) years will involve coordination with multiple agencies and organizations.

PR-15 Citizen Participation

SUMMARY OF CITIZEN PARTICIPATION PROCESS/EFFORTS MADE TO BROADEN CITIZEN PARTICIPATION

The development of the Consolidated Plan requires extensive citizen participation. For the 2024/2025 – 2028/2029 Consolidated Plan, the City of Traverse City, MI underwent an in-depth citizen participation process. HUD requires local jurisdictions to provide for citizen participation, which encourages the development of the Consolidated Plan in cooperation with residents from every walk of life. In particular, HUD believes it is important to obtain the views of residents who live in low- and moderate-income areas, as well as service providers who deliver services to low-income and special needs residents.

The following section describes the public participation process that was completed for the City of Traverse City, MI 2024/2025-2028/2029 Consolidated Plan. A summary of the public participation process is shown in **Table 4**.

TABLE 4: CITIZEN PARTICIPATION OUTREACH

Mode of Outreach	Target of Outreach	Summary of response/ Summary of comments received		Summary of comments not accepted and reasons
Online Community Survey	Non- Targeted/Broad Community	April 26, 2024, to June 23, 2024: 216 responses	Affordable Housing, specifically for vulnerable populations; Housing Availability; Supportive Services; Aging Infrastructure; Senior Housing Construction; Housing Rehabilitation; Mental Health Services; Homeless Facilities & Shelters; Substance Abuse Services; Fair Housing; Public Utility Improvements	All comments addressed by Strategic Plan
Public Meeting #1 – Stakeholder Focus Group	Non- Targeted/Broad Community	May 22, 2024: 15 attendees	Support day and seasonal overnight shelters; Homeless supportive services; Supportive Services for Elderly; Age-in-Place retrofits/housing rehabilitations; Accessibility improvements; Affordable Housing Construction (homeless and low/moderate income focus); Use allocation as leveraging opportunity; Park improvements; Sidewalk upgrades	All comments addressed by Strategic Plan
30-Day Comment Period	Non- Targeted/Broad Community	July 11, 2024 – August 12, 2024	TBD	TBD
City Commission Regular Meeting	Non- Targeted/Broad Community	June 17, 2024	An educational presentation was provided to the City Commission and the public regarding CDBG.	N/A
Public Hearing #2 – Adoption at City Commission	Non- Targeted/Broad Community	August 12, 2024	TBD	TBD

Table 4 – Citizen Participation Outreach

SUMMARIZE CITIZEN PARTICIPATION PROCESS AND HOW IT IMPACTED GOAL-SETTING

Comments and concerns raised during the citizen participation process were taken into consideration when developing the Consolidated Plan's goals, objectives, and strategies. The Consolidated Plan is a collaborative process that involves collaboration and meetings with the public to determine areas of need. As part of this process, the City sought to identify the priority needs and strategies to address

those needs. Priority needs were identified based on available housing data, public input obtained using an online survey, public meetings, and stakeholder consultation. In addition, the City consulted with various City Departments to identify priority needs and develop corresponding strategies. Complete summaries of the meetings are included in the Appendix to this document.

Housing Strategy

Housing strategies were determined by using housing data provided by HUD and the U.S. Census Bureau. Customized HUD data is available to help communities to evaluate housing and homeless needs. Complete summaries of this data are available in the Needs Assessment and Market Analysis sections, and in the Appendix to this document.

Additionally, a recent Housing Needs Assessment and Housing Tools for Affordability plan was completed by the Northwest Michigan Rural Housing partnership which also supports the housing strategy.

Homeless Strategy

Homeless strategies were developed in several ways. First, the City consulted the Greater Grand Traverse Area Continuum of Care's 10 Year Plan to End Homelessness, as well as other agencies, to obtain the latest point-in-time counts of the homeless population. The Greater Grand Traverse Area Continuum of Care is supported by the Goodwill of Northern Michigan, the lead agency for homeless services, and represents other agencies that implement homeless services. The City also utilized data from HUD that details the extent of homelessness and the availability of homeless facilities.

Community Development Strategy

Community Development strategies were determined through public meetings, an online survey, meetings with City staff, and review of current planning activities. The City is working to leverage other planning efforts with funding opportunities where possible.

Non-Housing Special Needs

Non-Housing Special Needs were determined through public meetings, an online survey, meetings with City staff, and HUD data. As with the homeless and housing areas, HUD and the U.S. Census Bureau provide data on Special Needs populations, primarily sourced from the American Community Survey

(ACS). In addition, there are service providers that are knowledgeable about Special Needs populations and were able to provide valuable information.

Needs Assessment



NA-05 Overview

NEEDS ASSESSMENT OVERVIEW

The Needs Assessment section of the Five-Year Consolidated Plan identifies the City of Traverse City's communitywide housing and community development needs. Data from the Comprehensive Housing Affordability Strategy (CHAS) database and the U.S. Census Bureau's American Community Survey (ACS) database are referenced in this section. Additionally, this section is supported with data from the local Public Housing Authority and other documentation from the City of Traverse City and its partners.

The Needs Assessment section evaluates the demand for housing and community development assistance by the following income groups based on Area Median Income (AMI):

- Extremely Low Income (60% of the Section 8 Very Low-Income Limits)
- Very Low Income (30%-50% AMI)
- Low Income (50%-80% AMI)

AMI is based on the 2024 HUD Income Limits Documentation System, which is outlined in Table 5.

TABLE 5: 2024 HUD INCOME LIMITS

FY 2024 Income Limit Area	Median Income	FY 2024 Income Limit Category	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Grand	averse \$99,800	Extremely Low (30%*)	20,800	23,750	26,700	31,200	36,580	41,960	47,340	52,720
Traverse County, MI		Very Low (50%)	34,600	39,550	44,500	49,400	53,400	57,350	61,300	65,250
		Low (80%)	55,350	63,250	71,150	79,050	85,400	91,700	98,050	104,350

 $2024\ HUD\ Income\ Limits\ Documentation\ System\ (2024);\ *Calculated\ as\ 30/50 ths\ (60\ \%)\ of\ the\ Section\ 8\ very\ low-income\ limits$

Table 5 – 2024 HUD Income Limits

According to HUD FY2024 Low/Mod data, which is based on the 2016-2020 ACS, there are approximately 9,725 persons of low- or moderate income within the jurisdiction as whole, which represents approximately 40% of the City of Traverse City's estimated population.

Low & Moderate Map 1 Income Low- and Moderate-Income Areas by 2020 Census Block Group Less than 51.00% Low-and Moderate-Income Residents Greater than 51.00% Low-and Moderate-Income Residents **Base Data** City of Traverse City State Water Features Railroads Highways and Major Roadways Roads Source: 2020 U.S. Census Block Groups; 2024 Low- and Moderate-Income Summary Data, Michigan Open Data; 2018-2022 ACS Aero Park City of Traverse City Consolidated Plan 2024 - 2028 o.9 Miles 0 0.23 0.45 1 July 2024

MAP 1: Low- and Moderate-Income Areas by Census Block Group

NA-10 Needs Assessment

SUMMARY OF HOUSING NEEDS

The data in the Housing Needs Assessment subsection provides the estimated number and type of households in need of housing assistance by income level, tenure type (owner or renter), household type, and housing problem (cost burdened, severely cost burdened, substandard housing, overcrowding, or geographic concentration of racial/ethnic groups). This section also integrates the needs identified during consultation and public outreach.

The Housing Needs Assessment includes the following sections:

- 1. Summary of Housing Needs
- 2. Demographics
- 3. Number of Households
- 4. Housing Problems 1
- 5. Housing Problems 2
- 6. Cost Burden > 30%
- 7. Cost Burden > 50%
- 8. Crowding Table (More than One Person Per Room)
- 9. Additional Housing Needs Narrative

This subsection also describes the characteristics of the City of Traverse City's households and housing stock.

Demographics

Table 6 displays the population, number of households, and median income for the base year, interim year, and most recent year, and the percentage of change over time. This data shows an overall population increase from 14,702 the 2008-2012 ACS to 15,468 at the time of the 2018-2022 ACS, an estimated 5% increase in population over that 10-year period.

Moreover, the number of households increased by 750 households from 6,354 households to an estimated 7,104 households between 2008-2012 ACS and 2018-2022 ACS estimates. This represents an estimated 12% increase in the number of households over that 10-year period.

Table 6 also identifies an estimated 60% increase in the median income (household), from \$23,403 to \$37,331 over the last 10 years.

TABLE 6: HOUSING NEEDS ASSESSMENT DEMOGRAPHICS

	Base Year	Base Year Most Recent Year	
	2008-2012 ACS	2018-2022 ACS	(2012-2022)
Population	14,702	15,468	5%
Households	6,354	7,104	12%
Median Income	\$23,403	\$37,331	60%

Source: 2008-2012 ACS (Base Year), 2018-2022 ACS (Most Recent Year)

Table 6 – Housing Needs Assessment Demographics

NUMBER OF HOUSEHOLDS AND TYPES

Table 7 shows the number and type of households by HUD Adjusted Median Family Income (HAMFI). The default data source is the 2016-2020 CHAS database, developed by HUD.

The highest number of households is in the greater than 100% HAMFI group with 3,350 households. The second highest is the >50-80% HAMFI group (1,145). Approximately 895 households or approximately 13% of all households in the City of Traverse City earn below 30% of HAMFI.

Small family households are households that have a family with two to four members. The highest number of small family households is within the >100% HAMFI group (1,335). The second-highest number of small family households is within the >50-80% HAMFI group (310). About 85 households or approximately 6% of small family households in the City of Traverse City earn below 30% of HAMFI.

Large family households are households that have a family of five or more members. Again, the highest number of large family households is within the >100% HAMFI group (255). The second-highest number of large family households is within the >80-100% HAMFI group (20). No large family households in the City of Traverse City earn below 30% of HAMFI.

Table 7 also provides data on households that contain at least one person considered to be elderly. The data suggest that among income groups, the largest number of households with a person 62-74 years of age is within the >100% HAMFI income group (960). The largest number of households with a person 75

years or older is also within the >100% HAMFI income group (340). About 425 households contain at least one person 62 years or older and earn below 30% of HAMFI, representing approximately 14% of elderly households.

Finally, data provided **Table 7** shows the number of households with one or more children 6 years old or younger. Among the household income groups identified, the highest number of households with children 6 years or younger is within the >100% HAMFI income category (260). The second highest number of households with children 6 years old or younger is within the >30-50% HAMFI group (115). Approximately 19% of households with one or more children 6 years old or younger make less than 30% HAMFI.

TABLE 7: TOTAL HOUSEHOLDS TABLE

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	895	885	1,145	615	3,350
Small Family Households	85	140	310	235	1,335
Large Family Households	0	0	4	20	255
Household contains at least one person 62-74 years of age	295	335	265	165	960
Household contains at least one-person age 75 or older	130	240	175	35	340
Households with one or more children 6 years old or younger	50	115	105	80	260

Source: HUD IDIS Output, May 2024: 2016-2020 CHAS

Table 7 - Total Households Table

HOUSING NEEDS SUMMARY TABLES FOR SEVERAL TYPES OF HOUSING PROBLEMS

Housing Problems 1

Table 8 displays the number of households with housing problems by tenure and HUD Adjusted Median Family Income (HAMFI) according to the default 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As defined by HUD, housing problems include:

- Substandard housing lacking complete plumbing facilities
- Substandard housing lacking complete kitchen facilities
- Overcrowded households with 1.01 to 1.5 people per room, excluding bathrooms, porches, foyers, halls, or half-rooms
- Households with housing cost burden greater than 30% of income

The first housing problem, substandard housing, is defined as a household without hot and cold piped water, a flush toilet and a bathtub or shower, and kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

The second housing problem identified is households living in overcrowded conditions. There are two forms of overcrowding defined by HUD and identified in **Table 8**:

- Severely overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or halfrooms.
- Overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or halfrooms.

The final housing problem identified is cost burden. Cost burden is a fraction of a household's total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities.

For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Cost burden is broken into two categories based on severity:

• Severe housing cost burden greater than 50% of income

• Housing cost burden greater than 30% of income

As shown in **Table 8**, among the "housing problem" categories, households within The City of Traverse City are most impacted by housing cost burden (greater than 30% of income) and severe housing cost burden (greater than 50% of income).

As shown in **Table 8**, 805 renters have a cost burden greater than 30% of income and 540 renters have a cost burden greater than 50% of income. An estimated 260 owners have a cost burden greater than 30% of income and 270 owners have a cost burden greater than 50% of income.

TABLE 8: HOUSING PROBLEMS TABLE (HOUSEHOLDS WITH ONE OF THE LISTED NEEDS)

	Renter						Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	
Substandard Housing - Lacking complete plumbing or kitchen facilities	0	15	0	0	15	0	0	0	4	4	
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	45	0	45	0	0	0	0	0	
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0	0	0	0	0	0	0	0	0	0	
Housing cost burden greater than 50% of income (and none of the above problems)	360	160	20	0	540	140	45	60	25	270	
Housing cost burden greater than 30% of income (and none of the above problems)	105	370	280	50	805	20	85	145	10	260	
Zero/negative Income (and none of the above problems)	105	0	0	0	105	10	0	0	0	10	

Table 8 – Housing Problems Table

Housing Problems 2

Table 9 displays the number of households with no housing problems, one or more housing problems, and negative income by tenure and HUD Area Median Income (AMI). The Default Data Source is the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As the data reveals in **Table 9**, of the total 880 households having one or more of four housing problems, the majority are renter households. Renters and owners in the 0-30% AMI group experience the highest occurrence of one or more of the four housing problems when compared to other income groups. Regardless of tenure, a total of 500 households below 30% AMI experience some form of housing problem. In the 0-30% AMI group, more renter households than owner households (360 and 140, respectively) have one or more of the four housing problems.

No households have negative income but none of the other four identified housing problems.

TABLE 9: HOUSING PROBLEMS 2 (HOUSEHOLDS WITH ONE OR MORE SEVERE HOUSING PROBLEMS: LACKS KITCHEN OR COMPLETE PLUMBING, SEVERE OVERCROWDING, SEVERE COST BURDEN)

			Renter		Owner					
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	360	180	60	0	600	140	45	60	35	280
Having none of four housing problems	345	485	515	295	1,640	45	175	510	290	1,020
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Source: HUD IDIS Output, May 2024: 2016-2020 CHAS

Table 9 – Housing Problems 2

Cost Burden > 30% and > 50%

Tables 10 and 11 display the number of households with housing cost burdens greater than 30% of income and greater than 50% of income, respectively, by household type, tenure, and household income (expressed as a percentage of Area Median Income (AMI)). The Default Data Source is the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

Households are broken into four categories:

- 1. Small related Family households with two to four related members
- 2. Large related Family households with five or more related members
- 3. Elderly A household whose head, spouse, or sole member is a person who is at least 62 years of age
- 4. Other All other households

As shown in **Table 10**, "Elderly" and "Other" households comprise the largest total share of households with cost burden greater than 30% of income. Approximately 785 "Elderly" households and 730 "Other" households have a cost burden greater than 30% of income. Approximately 80% of "Other" households are renters and nearly 70% of "Elderly" Households are renters.

"Large Related" households comprise the smallest share of households with cost burden greater than 30% of income. Only 4 "Large Related" households have a cost burden greater than 30% of income, of which all are owner households.

Like "Small Related" households comprise a small share of households with cost burden greater than 30% of income, with 310 total "Small Related" households having a cost burden greater than 30% of income. Of these, a little over two-thirds are renters.

For renter households, the 30-50% AMI group has the most households (545) with a cost burden greater than 30% of income. In contrast, among owner households, the >50 - 80% AMI group has the most households (209) with a cost burden greater than 30% of income. In total, cost burden affects more renters than owners (1,330 versus 499 households, respectively).

TABLE 10: COST BURDEN > 30%

		Rer	nter			Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total		
Small Related	70	90	50	210	20	10	70	100		
Large Related	0	0	0	0	0	0	4	4		
Elderly	145	325	65	535	100	90	60	250		
Other	250	130	205	585	40	30	75	145		
Total need by income	465	545	320	1,330	160	130	209	499		

Table 10 - Cost Burden > 30%

As shown in **Table 11**, "Elderly" and "Other" households comprise the largest total share of households with severe cost burden greater than 50% of income. Approximately 330 "Elderly" households and 325 "Other" households have a severe cost burden greater than 50% of income. Approximately 87% of "Other" households are renters and about 57% of "Elderly" Households are renters.

Comparatively, there are not any "Large Related" households with a cost burden greater than 50% of income. Additionally, only 30 "Small Related" households have a cost burden greater than 50% of income. Of these, the majority (two-thirds) are owners (20 households).

For renter households, the 30-50% AMI income group has the most households (310) with a cost burden greater than 50% of income. Among owner households, the 0-30% AMI group has the most households (140) with a cost burden greater than 50% of income.

TABLE 11: COST BURDEN > 50%

		Ren	nter		Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	
Small Related	0	0	10	10	20	0	0	20	
Large Related	0	0	0	0	0	0	0	0	
Elderly	95	95	0	190	80	35	25	140	
Other	0	215	70	285	40	0	0	40	
Total need by income	95	310	80	485	140	35	25	200	

Table 11 – Cost Burden > 50%

Crowding

Table 12 displays the number of households that are overcrowded, defined as households with more than one person per room, excluding bathrooms, porches, foyers, halls, or half-rooms. The data is displayed by household type, tenure, and household income (expressed as a percentage of Area Median Income (AMI)). The Default Data Source is 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As shown in **Table 12**, overcrowding is only prevalent in single family households at the >50-80% HAMFI income group. There are a total of 45 "Single Family" renter households who experience crowding.

TABLE 12: CROWDING INFORMATION 1 (MORE THAN ONE PERSON PER ROOM)

			Renter		Owner					
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	0	0	45	0	45	0	0	0	0	0
Multiple, unrelated family households	0	0	0	0	0	0	0	0	0	0
Other, non- family households	0	0	0	0	0	0	0	0	0	0
Total need by income	0	0	45	0	45	0	0	0	0	0

Table 12 – Crowding Information – 1/2

TABLE 13: CROWDING INFORMATION 2 (MORE THAN ONE PERSON PER ROOM)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Households with Children Present	-	-	-	-	-	-	-	-	-	-

Source: HUD IDIS Output, May 2024: 2016-2020 CHAS – Data not available

Table 13 – Crowding Information – 2/2

DESCRIBE THE NUMBER AND TYPE OF SINGLE PERSON HOUSEHOLDS IN NEED OF HOUSING ASSISTANCE.

A significant housing cost burden is associated with an increased risk of homelessness. If a household is severely cost burdened, that household may need housing assistance to remain housed.

Non-homeless elderly and other households have a significant cost burden when compared to other household types, with 785 elderly and 730 other households having a cost burden greater than 30% of income. Additionally, elderly households in The City of Traverse City may be comprised of single persons and may be considerably cost-burdened.

If a household is already homeless, they may need assistance to become rehoused. According to the most recent homeless census, or annual point-in-time (PIT) survey conducted on January 25, 2023, there were 198 homeless persons in 166 households that were counted in the Grand Traverse, Antrim, Leelanau County CoC that may need assistance to become rehoused.

ESTIMATE THE NUMBER AND TYPE OF FAMILIES IN NEED OF HOUSING ASSISTANCE WHO ARE DISABLED OR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND STALKING.

According to the 2018-2022 ACS 5-Year Estimates (the most recent dataset for which disability status is available), approximately 1,838 people or 12.2% of the population in the City of Traverse City is estimated to have a disability. While the majority of disabled persons (781 people) are over 65 years of age, a large number (772) of people between the ages of 18 and 64 years of age are disabled. In general, elderly populations are also likely to live on reduced income, experience housing cost burden, and need housing assistance.

According to the 2022 Michigan State Police Incident Crime Reporting Annual Report by County and City, Traverse City reported 24 incidents of sexual assault or rape. Grand Traverse County reported 969 cases of domestic violence. It should be noted that this is likely an undercount as these types of crimes often go unreported. Victims of domestic violence may need housing assistance to transition or escape from dangerous living situations.

WHAT ARE THE MOST COMMON HOUSING PROBLEMS?

By far, the most common housing problem in the City of Traverse City is cost burden, for both renter and owner households. More renter households experience cost burden when compared to owner households. In the City of Traverse City, substandard housing (lacking complete plumbing or kitchen facilities) and overcrowding affect both renter and owner households but are more prevalent among renter households. When all housing problems are considered, more renter households are considered to have housing problems due to the prevalence of cost burden among this group.

ARE ANY POPULATIONS/HOUSEHOLD TYPES MORE AFFECTED THAN OTHERS BY THESE PROBLEMS?

Although more renters are experiencing cost burden than owners, cost burden affects all income levels no matter the tenure. Households earning less than 50% AMI are experiencing higher rates of severe cost burden (i.e., greater than 50% of income) than households with higher incomes. Comparisons of cost burden by type of household show that while large, related households of any tenure are less affected by cost burden, elderly, and other household types are more affected by cost burden.

Substandard and overcrowded housing is more common among renter households, though is not a significant problem in the city. Single family renter households earning less than 80% AMI are more affected by crowding than multiple, unrelated family, or other non-family renter households of any income level. Single family owner households are more affected by crowding than multiple, unrelated family, or other non-family owner households.

DESCRIBE THE CHARACTERISTICS AND NEEDS OF LOW-INCOME INDIVIDUALS AND FAMILIES WITH CHILDREN (ESPECIALLY EXTREMELY LOW-INCOME) WHO ARE CURRENTLY HOUSED BUT ARE AT IMMINENT RISK OF EITHER RESIDING IN SHELTERS OR BECOMING UNSHELTERED 91.205(C)/91.305(C)). ALSO DISCUSS THE NEEDS OF FORMERLY HOMELESS FAMILIES AND INDIVIDUALS WHO ARE RECEIVING RAPID RE-HOUSING ASSISTANCE AND ARE NEARING THE TERMINATION OF THAT ASSISTANCE

Those at imminent risk of homelessness or nearing termination of assistance need additional resources like those of already homeless individuals, including other forms of housing assistance and referrals and references from the Greater Grand Traverse Area Continuum of Care, self-sufficiency training and case management, access to healthcare and mental health counseling, job training, and legal guidance.

IF A JURISDICTION PROVIDES ESTIMATES OF THE AT-RISK POPULATION(S), IT SHOULD ALSO INCLUDE A DESCRIPTION OF THE OPERATIONAL DEFINITION OF THE AT-RISK GROUP AND THE METHODOLOGY USED TO GENERATE THE ESTIMATES.

Not applicable.

SPECIFY PARTICULAR HOUSING CHARACTERISTICS THAT HAVE BEEN LINKED WITH INSTABILITY AND AN INCREASED RISK OF HOMELESSNESS.

The most recent homeless census for the Grand Traverse, Antrim, Leelanau County CoC, or annual point-in-time (PIT) survey, was conducted on January 25, 2023. The total number of homeless people counted during the annual PIT survey was 198. Of the 198 homeless persons counted, 44 were persons in households with adults and children, 153 were persons in households with only adults, and 1 was in a household with only children. There were 63 chronically homeless individuals reported. There were also four unaccompanied youth reported. Additionally, 8 homeless veterans and no people with HIV were reported. Because of the transient nature of homelessness, it is often difficult to locate homeless persons or to follow-up with much needed services and support.

DISCUSSION

The population and number of households living in the City of Traverse City has increased over the last decade, as has the median income. Nearly half of the City's households earns less than 80% HAMFI and approximately 12.5% of the City's households earn less than 30% HAMFI. Low and moderate income and special needs populations continue to experience higher rates of housing problems, such as substandard housing, cost burden, and overcrowding. As a result, these populations have an increased risk of homelessness. There may be an opportunity to coordinate with the City's rental inspection program to address housing problems in the future.

NA-15 Disproportionately Greater Need: Housing Problems

INTRODUCTION

A disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60% of all low-income households within a jurisdiction have a

housing problem and 70% of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households would have a disproportionately greater need.

Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provide information for the jurisdiction as a whole that can be useful in describing overall need. As a new entitlement grantee, this information is not currently available. The best available data is from the 2016-2020 CHAS data available through the Department of Housing and Urban Development.

Again, as defined by HUD, housing problems include:

- Substandard housing lacking complete plumbing facilities
- Substandard housing lacking complete kitchen facilities
- Overcrowded households with 1.01 to 1.5 people per room, excluding bathrooms, porches, foyers, halls, or half-rooms
- Households with housing cost burden greater than 30% of income

TABLE 14: HOUSING PROBLEMS BY INCOME GROUP

Household Income	Has one or more of four housing problems*			ne four housing lems*	Total Households
	Total	%	Total	%	
<=30% HAMFI	620	69.7%	270	30.3%	890
>30% to <=50% HAMFI	680	76.8%	205	23.2%	885
>50% to <=80% HAMFI	545	47.6%	600	52.4%	1,145
>80% to <=100% HAMFI	95	15.3%	525	84.7%	620
>100% HAMFI	100	3.0%	3,250	97.0%	3,350

Source: HUD IDIS Output, May 2024: 2016-2020 CHAS

Table 14 – Housing Problems by Income Group

^{*}The four housing 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost problems are: Burden greater than 30%

DISCUSSION

In general, **Table 14** indicates households with lower incomes experience higher rates of housing problems. A disproportionate need cannot be established based on the available data.

NA-20 Disproportionately Greater Need: Severe Housing Problems

INTRODUCTION

As noted in the previous section, a disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified; however, as a new entitlement grantee, this information is not currently available. A disproportionately greater need cannot be established for severe housing problems based on the available data.

Severe housing problems include:

- Severely overcrowded households with more than 1.5 persons per room, not including bathrooms, porches, foyers, halls, or half-rooms
- Households with severe cost burden of more than 50 percent of income

DISCUSSION

No further discussion.

NA-25 Disproportionately Greater Need: Housing Cost Burdens

INTRODUCTION

Again, a disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the

income level as a whole. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified; however, as a new entitlement grantee, this information is not currently available. The best available data is from the 2016-2020 CHAS data available through the Department of Housing and Urban Development.

This section includes:

- 1. Introduction
- 2. Housing Cost Burden by Tenure
- 3. Discussion

Table 15 displays cost burden information for the City of Traverse City including no cost burden (less than 30%), cost burden (30-50%), severe cost burden (more than 50%), and no data available. The default data source for this data is the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As the data in **Table 15** suggests, renter households tend to have an overall greater cost burden or severe cost burden when compare their owner household counterparts, within their current housing situation. No race or ethnicity data is available at this time.

TABLE 15: HOUSING COST BURDEN BY TENURE

Housing Cost Burden	Owner		Ren	ter	Total Households
, and the second	Total	%	Total	%	
No Cost Burden (<=30%)	3,590	74.9%	1,200	25.1%	4,790
Cost Burden (30-50%)	315	27.6%	825	72.4%	1,140
Severe Cost Burden (>50%)	280	33.3%	560	66.7%	840
Cost Burden Not Available	10	8.7%	105	91.3%	115

Source: June 2024: 2016-2020 CHAS

Table 15 - Greater Need: Housing Cost Burdens AMI

DISCUSSION

Within the City of Traverse City, 4,790 households do not presently experience cost burden, while an estimated 1,140 households experience cost burden, and 840 households experience severe cost burden.

NA-30 Disproportionately Greater Need: Discussion

ARE THERE ANY INCOME CATEGORIES IN WHICH A RACIAL OR ETHNIC GROUP HAS DISPROPORTIONATELY GREATER NEED

As a new entitlement grantee, this data is not currently available.

IF THEY HAVE NEEDS NOT IDENTIFIED ABOVE, WHAT ARE THOSE NEEDS?

Based on input and data received through an extensive citizen participation process, the greatest housing needs are:

- Fair housing education and support
- Housing rehabilitation, accessibility, and affordability (including ADA upgrades)
- Availability of diverse housing types, specifically for those exiting homelessness and for seniors.

This Five-Year Consolidated Plan addresses these housing needs through the Housing goal, by which the City strives to construct additional rental units and provide rental assistance to eligible households. The City will also work with elected officials and city departments to reduce barriers to affordable housing through land use policies and zoning incentives.

ARE ANY OF THOSE RACIAL OR ETHNIC GROUPS LOCATED IN SPECIFIC AREAS OR NEIGHBORHOODS IN YOUR COMMUNITY?

Five of the City's 20 Block Groups have a low- and moderate-income percentage of 51.00% or greater, signifying that approximately 25% of the City's neighborhoods is CDBG-eligible. These block groups are distributed throughout the City as shown on **Map 1**.

The City of Traverse City has a racial minority population (i.e., any race or combination of races other than White alone) of approximately 8%. A disproportionally greater concentration exists when a racial or ethnic minority population is 10 percentage points more or higher than the citywide population (i.e., 18% or greater). There are not any census tracts within the city that have a disproportionally greater concentration of minority populations.

As a whole, the City of Traverse City has an ethnic minority population of approximately 3.5%. A disproportionally greater (10 percentage points more or higher) concentration of ethnic minority population (i.e., 13.5%) does not exist within The City of Traverse City, since no Census Tract/Block Group has a percentage of Hispanic/Latino population that exceeds 13.5%.

NA-35 Public Housing

INTRODUCTION

The Consolidated Plan must provide a concise summary of the needs of public housing residents.

Information is collected through consultations with the public housing agency or agencies located within the jurisdiction's boundaries. The Public Housing portion of this report contains the following sections:

- Introduction
- Totals in Use
- Characteristics of Residents
- Race of Residents
- Ethnicity of Residents
- Additional Narrative

The City of Traverse City Housing Commission (TCHC) is the local Public Housing Authority within the city. They manage several public housing properties and administer the Housing Choice Voucher program and the Family Self Sufficiency program. Moreover, the City of Traverse City does not administer any project-based, tenant-based, or special purpose vouchers. The City works cooperatively with the TCHC and private entities in the provision of public and subsidized housing within the City of Traverse City.

The Housing Choice Voucher Program provides financial rental assistance to eligible individuals and families based upon income. The amount paid for rent and utilities will generally not exceed 30% of income. Family income must be within HUD's guidelines for household size in order to qualify. Housing units must pass the Housing Quality Standards Inspection per guidelines established by HUD. This program has a wait list.

Several subsidized housing complexes are in the broader Traverse City area, including Riverview Terrace Apartments, Orchardview Townhomes, Carson Square PSH, Ridgewood Townhomes, Woodmere Ridge, and Noble Pines Apartments. An expansion to Orchardview is in progress. These facilities serve low- and moderate-income and other income qualified families, as well as senior and mobility-impaired persons.

The following data provided in this chapter covers several program types and types of vouchers in use. These vouchers are defined below:

- Certificate: The total number of Section 8 certificates administered by the Public Housing Authority (PHA).
- Mod-Rehab: The total number of units in developments that were funded under the moderate rehabilitation program administered locally by PHAs.
- Public Housing: The total number of units in developments operated by the PHAs within the jurisdiction.
- Total: The total number of Section 8 vouchers administered by the PHA (project based plus tenant based)
- Project Based: The total number of project-based Section 8 vouchers administered by the PHA
- Tenant Based: The total number of tenant-based Section 8 vouchers administered by the PHA.
- Special Purpose Veterans Affairs Supportive Housing: The HUD-Veterans Affairs Supportive
 Housing program combines Housing Choice Voucher rental assistance for homeless veterans
 with case management and clinical services provided by the U.S. Department of Veterans Affairs
 (VA).
- Special Purpose Family Unification Program: Family Unification Program funding is allocated through a competitive process; therefore, not all PHAs administer the program.
- Special Purpose Disabled: In this context, disabled includes non-elderly disabled, mainstream 1-year, mainstream 5-year, and nursing home transition.

TOTALS IN USE

Table 16 displays the number of vouchers and units by public housing program type. According to the PIH Information Center (PIC), there are 174 vouchers in use in Traverse City. Additionally, there are 131 public housing units. Tenant-based vouchers are by far the most used program, with 157 vouchers currently in use. There are 13 project-based vouchers. According to PIC, there are not any Family Unification Program vouchers and only 1 Disabled voucher.

TABLE 16: PUBLIC HOUSING BY PROGRAM TYPE

				Prog	gram Type					
				Vouchers						
							Specia	al Purpose Vo	ucher	
	Certificate	Mod- Rehab	Public Housing	Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*	
# of units vouchers in use	0	0	131	174	13	157	0	0	1	

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Source: HUD IDIS Output, May 2024: Public Information Center (PIC) Office of Public and Indian Housing (PIH)

Table 16 – Public Housing by Program Type

CHARACTERISTICS OF RESIDENTS

Table 17 displays the characteristics of public housing residents by public housing program type. When analyzing the data there are several characteristics that correlate with a corresponding program type. The average income for all programs is very low, with an average of \$11,180 for public housing and \$11,218 for tenant-based units. The average household size is also very low (one or two persons per household for public housing and tenant-based programs).

Elderly program participants and families comprise a large number of the assisted families. There are 60 disabled families, and 131 families requesting accessibility features, as the number of families requesting accessibility features is equivalent to the total number of public housing units in use. These data show that most families in need of housing assistance/vouchers are also disabled or in need of housing accessibility features. No HIV/AIDS participants or victims of domestic violence were counted.

TABLE 17: CHARACTERISTICS OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE

				Progra	ım Type					
					Vouchers					
							Specia	al Purpose Vou	ucher	
	Certificate	Mod- Rehab	Public Housing	Total	Project -based	Tenant -based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*	
Average Annual Income	0	0	11,180	11,418	9,294	11,218	0	0	0	
Average length of stay	0	0	5	5	1	6	0	0	0	
Average Household size	0	0	1	2	2	2	0	0	0	
# Homeless at admission	0	0	1	1	1	0	0	0	0	
# of Elderly Program Participants (>62)	0	0	56	36	0	36	0	0	0	
# of Disabled Families	0	0	60	65	3	61	0	0	0	
# of Families requesting accessibility features	0	0	131	174	13	157	0	0	0	
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	0	
# of DV victims	0	0	0	0	0	0	0	0	0	

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Source: HUD IDIS Output, May 2024: Public Information Center (PIC) Office of Public and Indian Housing (PIH)

Table 17 – Characteristics of Public Housing Residents by Program Type

RACE OF RESIDENTS

Table 18 displays the racial composition of residents for each public housing program. The majority of public housing residents are White. The data in **Table 18** show that a very small number of the available assistance is utilized by Black/African American, and American Indian/Alaska Native. No voucher holders identify as Asian, Pacific Islander, or another race of resident.

TABLE 18: RACE OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE

				Progra	am Type				
							Specia	al Purpose Vo	ucher
Race	Certificate	Mod- Rehab	Public Housing	Total	Project -based	Tenant -based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
White	0	0	129	171	13	154	0	0	1
Black/African American	0	0	2	2	0	2	0	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaska Native	0	0	0	1	0	1	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Source: HUD IDIS Output, May 2024: Public Information Center (PIC) Office of Public and Indian Housing (PIH)

Table 18 – Race of Public Housing Residents by Program Type

ETHNICITY OF RESIDENTS

Table 19 displays the ethnic composition of residents for each assisted housing program. The ethnic groups defined as "Not Hispanic" utilize the majority of units or vouchers available. Residents reporting as "Hispanic" utilize about 1% of the units or vouchers available.

TABLE 19: ETHNICITY OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE

				Prog	ram Type				
							Specia	al Purpose Voi	ucher
Race	Certificate	Mod- Rehab	Public Housing	Total	Project -based	Tenant -based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	0	0	2	0	2	0	0	0
Not Hispanic	0	0	131	172	13	155	0	0	1

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Source: HUD IDIS Output, May 2024: Public Information Center (PIC) Office of Public and Indian Housing (PIH)

Table 19 – Ethnicity of Public Housing Residents by Program Type

Section 504 Needs Assessment

DESCRIBE THE NEEDS OF PUBLIC HOUSING TENANTS AND APPLICANTS ON THE WAITING LIST FOR ACCESSIBLE UNITS

A significant number of families on the Housing Choice Voucher Assistance waiting lists are disabled. Moreover, elderly households are also in need of accessible units. The City of Traverse City is an older urban area that is characterized by single-family, detached homes (about 65% of housing units). Because the City of Traverse City has a limited supply of affordable rental properties, the City works with the surrounding community to provide housing assistance. The City's CDBG program may work to identify local landlords to supply housing and make appropriate referrals.

MOST IMMEDIATE NEEDS OF RESIDENTS OF PUBLIC HOUSING AND HOUSING CHOICE VOUCHER HOLDERS

Families identified as "Families with Disabilities" have an immediate need for public housing and tenant-based housing with improved accessibility. The number of disabled families assisted totals 131 (public

housing tenants) and 174 (housing choice voucher holders). All of those individuals/families assisted are requesting accessibility features. These data show that most families in need of housing assistance are also disabled or in need of accessibility features. Additionally, 92 program participants are elderly (>62 years) and thus likely to need accessible units.

HOW DO THESE NEEDS COMPARE TO THE HOUSING NEEDS OF THE POPULATION AT LARGE

The average income for all public housing programs is very low (less than \$12,000 annually). Tenants and voucher holders, as well as applicants on waiting lists, are typically cost burdened and many are elderly and/or disabled. Due to their limited income, their housing needs include affordability, availability of assistance, accessibility improvements for the elderly and/or disabled, and Fair Housing options.

DISCUSSION

The City works cooperatively with the Traverse City Housing Commission and private entities in the provision of public and subsidized housing within Traverse City. The TCHC administers vouchers and public housing in the city. Among other assistance, TCHC administers the Family Self Sufficiency program that provides hands on coaching to qualified families for job training, financial management and other life skills. The Family Self Sufficiency Program brings together a group of local agencies including schools, job training programs, childcare and service providers for the purpose of providing resources to complete goals. The goal of the Family Self Sufficiency Program is to assist families in achieving economic independence.

NA-40 Homeless Needs Assessment

INTRODUCTION

Meeting homelessness challenges in the City of Traverse City is a collaborative effort comprising numerous individuals, agencies, and organizations. The City of Traverse City is within the Grand Traverse, Antrim, Leelanau County CoC. The Greater Grand Traverse Area Continuum of Care (CoC) is responsible for collecting homeless data, conducting homeless needs assessments, and developing community supported homelessness strategies is the Greater Grand Traverse Area. The Continuum of Care supports the communities of Grand Traverse County, including the City of Traverse City. Most of

the data utilized in this section of the Plan was gathered from the Greater Grand Traverse Area Continuum of Care.

As a part of the Consolidated Plan process, the City coordinated with the Greater Grand Traverse Area Continuum of Care to obtain data related to the homeless population in the City of Traverse City. The Greater Grand Traverse Area Continuum of Care regularly conducts a homeless census where volunteers reach out to identify the homeless and have them complete a short survey to gather information about the number of homeless as well as the characteristics of this population. It should be noted that any homeless census is an undercount because it is impossible to count locate every homeless person within geography as broad as Grand Traverse County.

There are four federally defined categories under which individuals and families may qualify as homeless:

- 1. Literally homeless;
- 2. Imminent risk of homelessness;
- 3. Homeless under other Federal statues; and
- 4. Fleeing/attempting to flee domestic violence.

HOMELESS NEEDS ASSESSMENT

The most recent homeless census for the Grand Traverse, Antrim, Leelanau Counties CoC, or annual point-in-time (PIT) survey, was conducted on January 25, 2023. The results of this survey are summarized in **Table 20(A)**. The methodology used by the Greater Grand Traverse Area Continuum of Care included actual counts of homeless persons living on the streets and in shelters in the Continuum of Care area. The total number of homeless people counted during the survey was 198.

Of the 198 homeless persons counted in 2023, 44 were persons in households with adults and children and 153 were persons in households with only adults. There were 63 chronically homeless individuals reported. There were four unaccompanied youth reported. Because of the transient nature of homelessness, it is often difficult to locate homeless persons or to follow-up with much needed services and support.

TABLE 20(A): HOMELESS NEEDS ASSESSMENT

Population	experiencing	e # of persons homelessness ven night	Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	44	0	N/A	N/A	N/A	N/A
Persons in Households with Only Children	1	0	N/A	N/A	N/A	N/A
Persons in Households with Only Adults	118	35	N/A	N/A	N/A	N/A
Chronically Homeless Individuals	39	22	N/A	N/A	N/A	N/A
Chronically Homeless Families	2	0	N/A	N/A	N/A	N/A
Veterans	8	0	N/A	N/A	N/A	N/A
Unaccompanied Child	4	0	N/A	N/A	N/A	N/A
Persons with HIV	0	0	N/A	N/A	N/A	N/A

Source: 2023 Point-In-Time Count: Grand Traverse, Antrim, Leelanau County CoC, completed January 25, 2023; N/A – No data available.

Table 20(A) – Homeless Needs Assessment

HOMELESS POPULATION TYPES INCLUDING CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS AND THEIR FAMILIES, AND UNACCOMPANIED YOUTH)

Chronically homeless

HUD defines a person as chronically homeless if they have been homeless for one year or longer or have had four or more episodes of homelessness within the past three years and have a disabling condition. National studies have found that when all costs are factored in, chronically homeless persons account for approximately 50 percent of the total expenditures for homeless services. This percentage of expenditure is based on a national average of just fewer than 16% of all homeless persons being considered as chronically homeless. In the Grand Traverse, Antrim, Leelanau County area, the percentage of chronically homeless persons is slightly higher. Of the sheltered persons counted during

the 2023 PIT, nearly 32% of those surveyed, or 63 individuals, met the HUD definition of chronically homeless.

Families

Persons in families comprised a large segment of the overall homeless population counted by the Greater Grand Traverse Area Continuum of Care. Of the homeless counted, 44 persons were in family households with children and 153 persons were in households with only adults.

Veterans

There were 8 homeless veterans reported in the 2023 PIT count; however, there may be additional veterans who are struggling with homelessness or are at-risk of homelessness due to disabilities and illness, including drug or alcohol addiction.

Unaccompanied Youth

Unaccompanied youth accounted for approximately 2% or four of the 198 homeless persons that agreed to be surveyed.

ESTIMATE THE NUMBER AND TYPE OF FAMILIES IN NEED OF HOUSING ASSISTANCE

Persons in families comprised a large segment of the overall homeless population counted by the Greater Grand Traverse Area Continuum of Care. Of the homeless counted, 44 persons were in family households with children and 153 persons were in households with only adults.

NATURE AND EXTENT OF HOMELESSNESS BY RACIAL AND ETHNIC GROUP

Homelessness is not unique to a particular gender, race, or ethnicity. **Table 20(B)** provides demographic data regarding the homeless population in Grand Traverse County. Approximately 33% of those interviewed were women. The majority of those interviewed (66%) were adult males.

According to the 2023 PIT Count data collected by the Greater Grand Traverse Area Continuum of Care, the most reported races were White, at 77% of the homeless interviewed, and Multi-Racial, at nearly 15% of the homeless interviewed. Less than 10% reported as another race. Most homeless persons interviewed (92%) were not Hispanic.

TABLE 20(B): HOMELESSNESS BY RACIAL AND ETHNIC GROUP

Race	Sheltered	Unsheltered
White	124	29
Black or African American	6	1
Asian	0	0
American Indian or Alaska Native	8	1
Pacific Islander	0	0
Multi-Racial	25	4
Ethnicity	Sheltered	Unsheltered
Hispanic	14	2
Not Hispanic	149	33

Source: 2023 Point-In-Time Count: Grand Traverse, Antrim, Leelanau County CoC, completed January 25, 2023; N/A – No data available

Table 20(B) – Homelessness by Racial and Ethnic Group

NATURE AND EXTENT OF UNSHELTERED AND SHELTERED HOMELESSNESS

The total number of homeless people counted during the annual PIT survey was 198. Of the 198 homeless persons counted, 44 were persons in family households with adults and children and 153 were persons in households with only adults. There were 63 chronically homeless individuals reported. There were also four unaccompanied youth reported.

Because of the transient nature of homelessness, it is often difficult to locate homeless persons or to follow-up with much needed services and support.

DISCUSSION

In conjunction with the Greater Grand Traverse Area Continuum of Care, a number of organizations serving the greater Traverse City area provide temporary, transitional and permanent supportive housing for families in need of assistance. These include but are not limited to Northwest Michigan Community Action Agency, Goodwill of Northern Michigan, Northwest Michigan Support Housing, Housing North, Michigan Balance of State, Women's Resource Center, Dan's House, Child & Family Services, Safe Harbor, and Northwest Michigan Coalition to end Homelessness.

NA-45 Non-Homeless Special Needs Assessment

INTRODUCTION

A broad category that applies to any population that is presumed to be low to moderate income and in need of public services, non-homeless special needs include those of the mentally ill, developmentally disabled, at-risk youth, elderly, and other groups such as persons with HIV/AIDS. These special needs are often addressed by non-profit agencies, usually in coordination with the City of Traverse City or Grand Traverse County.

DESCRIBE THE CHARACTERISTICS OF SPECIAL NEEDS POPULATIONS IN THE COMMUNITY

Understanding the characteristics of its special needs populations will help the City of Traverse City to better evaluate public facilities and services directed toward such needs.

Elderly & Frail Elderly

According to HUD's Comprehensive Housing Affordability Strategy (CHAS), HUD defines "elderly" as individuals over the age of 62 and "frail elderly" as individuals over the age of 75. Due to age, the frail elderly may be unable to care for themselves adequately and may have one or more disabilities or need assistance to perform the routine activities of daily life. According to the 2018-2022 ACS 5-Year Estimates, there are 4,327 individuals over the age of 62 in the city. There are approximately 833 elderly individuals over the age of 65 living with a disability. 3,422 or 27% of the 12,853 individuals over the age of 65 living in the city have a disability. It is estimated that 57 of these individuals are below the federal poverty level and may have an increased need for supportive services and aid.

Youth and Young Adults

According to the 2018-2022 ACS 5-Year Estimates, 2,627 people, or approximately 17% of Traverse City's population, are less than 18 years of age. Of the population less than 18 years of age, approximately 12.4% or 327 children are living in poverty.

Physically & Developmentally Disabled

According to the 2018-2022 ACS 5-Year Estimates, disabilities are categorized into six types: hearing difficulty, vision difficulty, cognitive ability, ambulatory difficulty, self-care difficulty, and independent

living difficulty. Approximately 1,838 people or 12.2% of the population in Traverse City reported having a disability.

Mental Illness & Substance Abuse

The Department of Housing and Urban Development, in the Comprehensive Housing Affordability Strategy (CHAS) manual, defines severe mental illness as a persistent mental or emotional impairment that significantly limits a person's ability to live independently. According to the national statistics, approximately one percent of the adult population meets the definition of severely mentally ill.

According to the American Community Survey, the City of Traverse City has an estimated adult population (over 18 years of age) of approximately 12,841 persons, or 83% of the total population. According to the Substance Abuse and Mental Health Services Administration (SAMHSA) 2019 National Survey of Substance Abuse Treatment Services, in Michigan alone, 557 persons per 100,000 population of adult age are in treatment for either an alcohol or drug abuse problem. Since The City of Traverse City is estimated to have an adult population (age 18 or older) of 12,841 persons, an estimated 71 individuals in Traverse City may have a substance abuse problem.

Victims of Domestic Violence, Dating Violence, Sexual Assault and Stalking

According to the 2022 Michigan State Police Incident Crime Reporting Annual Report by County and City, Traverse City reported 24 incidents of sexual assault or rape. Grand Traverse County reported 969 cases of domestic violence. It should be noted that this is likely an undercount as these types of crimes often go unreported. Victims of domestic violence may need housing assistance to transition or escape from dangerous living situations.

WHAT ARE THE HOUSING AND SUPPORTIVE SERVICE NEEDS OF THESE POPULATIONS AND HOW ARE THESE NEEDS DETERMINED?

Elderly & Frail Elderly

Within Traverse City, much of the elderly population is concentrated in low- and moderate-income neighborhoods. The elderly and frail elderly typically need assistance with housing rehabilitation and home maintenance. Additionally, the elderly may need facilities and programming, such as those provided at senior centers. The expansion of senior services was identified as a priority need based on citizen feedback.

The elderly are also susceptible to financial difficulties as well as to health problems, including those caused by poor nutrition. There are numerous organizations throughout the Grand Traverse County region to support with these services. These types of organizations are critical in determining and meeting elderly and frail elderly service needs.

Youth and Young Adults

Youth services, particularly mental health services, and technical/vocational training were identified as priority needs based on citizen feedback and discussion of community needs. There is generally a need to coordinate with schools to provide mental health/counseling for youth. Currently, there are several agencies within Grand Traverse County that provide programing for low- and moderate-income children. Supportive service needs for youth and young adults are determined by such providers.

Physically and Developmentally Disabled

Accessibility improvements and other supportive services, such as employment assistance, are typical needs of this population. Currently, there are several agencies within Grand Traverse County that provide services for people with disabilities. Supportive service needs for the disabled are determined by such providers.

Mental Illness & Substance Abuse

Healthcare and mental health counseling are typical needs of this population. Currently there are several agencies in Grand Traverse County that offer services to the mentally ill and substance abusers. Supportive service needs for the mentally ill and substance abusers are determined by such providers.

Victims of Domestic Violence, Dating Violence, Sexual Assault and Stalking

Family safety and advocacy for both adults and children are typical needs of this population. Currently there are several organizations in Grand Traverse County that offer services to victims of domestic violence, dating violence, sexual assault, and stalking. Supportive service needs for victims of domestic violence are determined by such providers.

DESCRIBE THE SIZE AND CHARACTERISTICS OF THE POPULATION WITH HIV/AIDS

The U.S. Center for Disease Control and Prevention (CDC) estimates that over one million adults and adolescents are living with HIV in the U.S., including those not yet diagnosed and those who have

already progressed to AIDS. According to a report that was presented and prepared by the Michigan Department of Health and Human Services (Updated in July 2023), Grand Traverse County had approximately 2 diagnoses of HIV per 100,000 residents per year in 2022. Therefore, there may be a small handful of persons living with HIV/AIDS in the City.

Persons who are HIV positive do not, simply by virtue of having the HIV antibody, require special housing. Currently, there are no specific housing programs for persons living with HIV/AIDS; however, equal access to housing is a priority for the City of Traverse City. Agencies such as Munson Medical Center provide care and supportive services to those living with HIV/AIDS.

DISCUSSION

Non-Homeless Special Needs is a broad category that applies to any population that is presumed to be low to moderate income and in need of public services. The category covers a large population, including the mentally ill, developmentally disabled, elderly, and other groups.

Services to address these needs are often provided by non-profit agencies, usually in coordination with the City of Traverse City or Grand Traverse County; however, many of these agencies are overburdened and continue to need funding assistance for service delivery.

NA-50 Non-Housing Community Development Needs

PUBLIC FACILITIES NEEDS

The community has not indicated a high priority need for public facility improvements; however, the City may need improvements at public parks, community/senior centers, sidewalks, and bike lanes. Also needed are transportation and transit opportunities, which may require new public facilities.

PUBLIC FACILITIES NEED DETERMINATION

These needs were determined by the City of Traverse City based on citizen feedback received through the online survey and discussion of community needs during public meetings.

PUBLIC IMPROVEMENTS NEEDS

The community has identified the following public improvement needs: Roads conditions and maintenance, as well as public infrastructure improvements (e.g., water, stormwater) and other utilities. Also needed are pedestrian/bicycle safety, sidewalks, and street lighting improvements.

PUBLIC IMPROVEMENTS NEED DETERMINATION

These needs were determined by the City of Traverse City based on citizen feedback received through the online survey and discussion of community needs during public meetings.

PUBLIC SERVICES NEEDS

The community has identified the follow public service needs: mental health services, youth and senior services, technical/vocational training, and small business assistance. Of particular emphasis, are services related to mental health services, rental and mortgage assistance, and homeless prevention.

PUBLIC SERVICES NEED DETERMINATION

These needs were determined by the City of Traverse City based on citizen feedback received through the online survey and discussion of community needs during public meetings.



MA-05 Overview

HOUSING MARKET ANALYSIS OVERVIEW

The purpose of the Market Analysis is to provide a clear picture of the environment in which the City of Traverse City must administer its programs over the course of the Consolidated Plan. In conjunction with the Needs Assessment, the Market Analysis will provide the basis for the Strategic Plan and the programs and projects to be administered. Most of the data tables in this section are populated with a default data set based on the most recent data available. Additional data has been obtained from various sources, including more current American Community Survey (ACS) estimates and local data from the City of Traverse City and Grand Traverse County. This section covers the following broad topics:

- General Characteristics of the Housing Market: The general characteristics of the City's housing market, including supply, demand, and condition and cost of housing, are described in the following sections: Number of Housing Units (MA-10); Cost of Housing (MA-15); and, Condition of Housing (MA-20).
- <u>Lead-based Paint Hazards:</u> The Condition of Housing (MA-10) section provides an estimate of the number of housing units within the City of Traverse City that are occupied by low-income families or moderate-income families that contain lead-based paint hazards.
- Public and Assisted Housing: A description and identification of the public housing developments
 and public housing units in Traverse City is provided in the Public and Assisted Housing (MA-25)
 section. This narrative describes the physical condition of such units, the restoration and
 revitalization needs, Section 504 needs, and the public housing agency's strategy for improving
 the management and operation of public housing and the living conditions of low- and
 moderate-income families in public housing.
- <u>Assisted Housing:</u> The information collected in the Number of Housing Units (MA-10) section
 describes the number and targeting (income level and type of family served) of units currently
 assisted by local, state, or Federally funded programs and an assessment of whether any such

- units are expected to be lost from the assisted housing inventory for any reason, such as expiration of Section 8 contracts.
- Facilities, Housing, and Services for Homeless Persons: A brief inventory of facilities, housing, and services that meet the needs of homeless persons within the City is provided in the Homeless Facilities and Services (MA-30) section. A particular emphasis is given to chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. The inventory includes services directly targeted to homeless persons, as well as mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.
- Special Need Facilities and Services: The Special Needs Facilities and Services (MA-35) section
 describes the housing stock available to serve persons with disabilities and other low-income
 persons with special needs, including persons with HIV/AIDS and their families. The section
 further describes the facilities and services that assist persons who are not homeless, but who
 require supportive housing and programs for ensuring that persons returning from mental and
 physical heath institutions receive appropriate supportive housing.
- <u>Barriers to Affordable Housing:</u> This section (MA-40) provides an assessment of the regulatory barriers to affordable housing that exist within the City of Traverse City. These regulatory barriers may include tax policies affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.
- <u>Broadband Needs</u>: This section (MA-60) describes the need for broadband wiring and connections, as well as increased competition between broadband providers, to better serve low- and moderate-income households.
- <u>Hazard Mitigation</u>: This section (MA-65) describes the natural hazard risks associated with climate change and vulnerability to these risks of housing occupied by low- and moderateincome households.

MA-10 Number of Housing Units – 91.210(a) & (b) (2)

INTRODUCTION

The total number of housing units in the City of Traverse City increased slightly over the past decade. The City had a total of 7,471 housing units at the time of the 2008-2012 ACS and 8,302 housing units at the time of the 2018-2022 ACS, representing a growth in total number of housing units of 11%.

TABLE 21: ALL RESIDENTIAL PROPERTIES BY NUMBER OF UNITS

Property Type	Number	%
1-unit detached structure	5,155	62.1%
1-unit, attached structure	348	4.2%
2-4 units	698	8.4%
5-19 units	1,315	15.8%
20 or more units	746	9.0%
Mobile Home, boat, RV, van, etc.	40	0.5%
Total	8,302	100%

Data Source: 2018-2022 ACS

Table 21 - Residential Properties by Unit Number

As shown in **Table 21**, data from the 2018-2022 ACS show that the majority of residential properties are single units (66.3%). Single-unit properties are either detached structures (62.1%) or attached structures (4.2%). Residential properties are further categorized into properties within 2-4 unit structures (8.4%), properties within 5-19 unit structures (15.8%), and properties within 20 or more-unit structures (9.0%). These categories comprise 99.5% of the City's housing stock. The remainder of residential properties in the City is classified as mobile home, boat, RV, van, etc. (0.5%).

TABLE 22: UNIT SIZE BY TENURE

	Own	ers	Renters		
	Number %		Number	%	
No bedroom	45	1%	40	2%	
1 bedroom	162	4%	877	32%	
2 bedrooms	1,090	25%	1,154	42%	
3 or more bedrooms	3,080	70%	656	24%	
Total	4,377	100%	2,727	100%	

Data Source: 2018-2022 ACS

Table 22 - Unit Size by Tenure

As shown in **Table 22,** there are an estimated 7,104 occupied housing units within the City. Of this total, nearly 62% are owner-occupied and approximately 38% are renter-occupied. Of all owner-occupied units, most contain 2 or 3 bedrooms (95%). Only a small number of owner-occupied units have 1 bedroom (4%) or are without bedrooms (1%). Of all renter-occupied units, most contain 1 or 2 bedrooms (74%). A significant percentage of renter-occupied units have 3 bedrooms (24%). Only a small percentage of renter-occupied units are without bedrooms (2%).

DESCRIBE THE NUMBER AND TARGETING (INCOME LEVEL/TYPE OF FAMILY SERVED) OF UNITS ASSISTED WITH FEDERAL, STATE, AND LOCAL PROGRAMS

As was noted earlier in Section NA-35, the Traverse City Housing Commission has been charged with the responsibility of the administration of housing programs for low-income persons. The operations of the are funded through annual appropriations provided by HUD.

According to the Office of Public and Indian Housing (PIH) Public Information Center (PIC), the following number and type of voucher units are available within The City of Traverse City (see also **Table 31**):

- 131 total public housing units available
- 174 total vouchers available

Additionally, that City has participated in many Payment In Lieu Of Taxes (PILOT) Programs. A housing program is a financial arrangement that provides property tax relief to developers or property owners in exchange for developing or maintaining affordable housing. Under a PILOT agreement, instead of paying standard property taxes, the property owner makes negotiated payments to the local government that are typically lower than the regular tax rate. These payments are used to support local services and infrastructure, similar to how regular property taxes are used. The following are a list of developments that have benefited from this program:

- Ruth Park
- Annika Place
- Annika Place II
- Development by HomeStretch
- Parkview Senior Apartment, in cooperation with TCHC
- Bradley Commons
- 125/145 Hall Street
- 155 Garland Street
- Easy Bay Flats

PROVIDE AN ASSESSMENT OF UNITS EXPECTED TO BE LOST FROM THE AFFORDABLE HOUSING INVENTORY FOR ANY REASON, SUCH AS EXPIRATION OF SECTION 8 CONTRACTS

Some units assisted with Federal, state, or local programs may be lost from the inventory during the five-year planning period; however, because the City is unaware of any expiring contracts at this time.

DOES THE AVAILABILITY OF HOUSING UNITS MEET THE NEEDS OF THE POPULATION?

A shortage of affordable housing may exist for very low- and low-income households in the City of Traverse City. This affordable housing deficiency is more fully documented in the next section (MA-15).

DESCRIBE THE NEED FOR SPECIFIC TYPES OF HOUSING

Generally, a diverse distribution of housing types is found within the City. The majority of housing units in the City are units within single-unit, detached structures, while a moderate portion are within multiple-unit structures. This distribution does not provide a diverse selection of housing for low- and moderate-income residents or those at risk of homelessness. In terms of housing unit size, except for relatively uncommon efficiency units (no bedrooms), a variety of unit sizes (1, 2, and 3 or more bedrooms) are available within the City (see **Table 21** and **Table 22**). It is important to note that in The City of Traverse City, according to the 2018-2022 ACS, more owners tend to occupy larger units (3 or more bedrooms) while more renters tend to occupy smaller units (efficiency and 1 bedroom). These trends may indicate a lack of larger units available for rental, or point to affordability concerns as unit size increases, or vice versa.

There's a significant demand for affordable rental units and homes for purchase to support the workforce, including service industry workers, teachers, and healthcare professionals. Additionally, ss

the population ages, there is a growing need for affordable housing options that cater to seniors on fixed incomes, including independent living facilities and assisted living homes.

DISCUSSION

Although the number of housing units in the City increased since the year 2000, there have been relatively few affordable housing units added for vulnerable populations. Considering the extent of cost-burden, a shortage of affordable housing may exist for very low- and low-income households in The City of Traverse City. Given the City's housing stock profile, there is a lack of diversity of housing types within the City. Many of these units are within single-unit, detached structures and many of these units are owner-occupied.

The Traverse City Housing Commission among other housing providers, administers public housing and voucher programs within the City. The City of Traverse City is unaware of any contract expirations and/or losses of units during the five-year planning period.

MA-15 Housing Market Analysis: Cost of Housing – 91.210(a)

INTRODUCTION

This section provides an overall picture of housing costs within the City of Traverse City. Specifically, the section describes housing cost trends, rent trends, fair market rents, and affordability.

TABLE 23: COST OF HOUSING

	Base Year: 2012	Most Recent Year: 2022	% Change
Median Home Value	\$174,500	\$336,900	93%
Median Contract Rent	\$706	\$948	34%

Data Source: 2008-2012 ACS (Base Year), 2018-2022 ACS (Most Recent Year)

Table 23 – Cost of Housing

The costs of housing trends for the City of Traverse City are displayed in **Table 23**. According to the 2018-2022 ACS, the current median home value for the City of Traverse City is estimated to be \$336,900. This figure represents a 93% increase from the 2008-2012 ACS median home value of \$174,500.

In June of 2024, Zillow lists the average home value in Traverse City of be \$436,516.

Between the 2008-2012 ACS and the 2018-2022 ACS, the median contract rent within the City increased by 34%, from \$706 to \$948.

TABLE 24: RENT PAID

Rent Paid	Number	%
Less than \$500	376	14.3%
\$500-999	909	34.5%
\$1,000-1,499	917	34.8%
\$1,500-1,999	256	9.7%
\$2,000 or more	175	6.7%
Total	2,633	100%

Data Source: 2018-2022 ACS

Table 24 - Rent Paid

The distribution of estimated rents paid within the City of Traverse City is detailed in **Table 24**, according to 2018-2022 ACS data. Of all occupied rental units within the City that are paying rent, more than half (69.3%) have a rent between \$500 and \$1,499. Approximately 16% of rental units have rent between greater than \$1,500. About 14% of the City's rental units have a rent less than \$500.

TABLE 25: HOUSING AFFORDABILITY

% Units affordable to Households	Renter	Owner
30% HAMFI	290	No Data
50% HAMFI	1,020	80
80% HAMFI	1,995	425
100% HAMFI	No Data	809
Total	3,305	1,314

Data Source: 2016-2020 CHAS

Table 25 – Housing Affordability

The overall housing affordability within the City of Traverse City is detailed in **Table 25**. This data is sourced from the 2016-2020 CHAS (HUD), which is a different data source than the 2018-2022 ACS; therefore, totals may differ. According to HUD, a unit is considered affordable if gross rent, including utilities, is no more than 30% of the household income. The table, based on 2016-2020 CHAS data, first divides households into four income ranges: less than or equal to 30% HUD Adjusted Median Family

Income (HAMFI), less than or equal to 50% HAMFI, less than or equal to 80% HAMFI, and less than or equal to 100% HAMFI. The table also separates housing units into either rental units or owner units. For households with incomes less than or equal to 30% HAMFI, a total of 190 available rental units are affordable, while no data is available for owner units. For households with incomes less than or equal to 50% HAMFI, a total of 1,020 affordable rental units are available, while 80 affordable owner units are available. For households with incomes less than or equal to 80% HAMFI, a total of 1,995 affordable rental units are available, while 425 affordable owner units are available. Finally, for households with incomes less than or equal to 100% HAMFI, a total of 809 affordable owner units are available, while no data is provided for affordable rental units.

As noted previously in **Table 22**, an estimated 2,727 renter-occupied housing units are located within the City of Traverse City (2018-2022 ACS). Of this total, only about 10.6% of renter-occupied housing units are affordable to the lowest income households (less or equal to 30% AMFI) and 37.4% are affordable to households earning less than or equal to 50% AMFI. A much larger percentage (73.1%) of renter-occupied housing units are affordable to households earning less than or equal to 80% AMFI.

An estimated 4,377 owner-occupied housing units are located within The City of Traverse City (see **Table 22**). Of this total, nearly 2% are affordable to households earning less than or equal to 50% HAMFI, about 10% are affordable to households earning less than or equal to 80% HAMFI, and 18.4% are affordable to households earning less than or equal to 100% HAMFI. In general, only 30% of owner-occupied housing units are affordable.

TABLE 26: MONTHLY RENT

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$1,044	\$1,061	\$1,232	\$1,490	\$1,641
High HOME Rent	\$1,044	\$1,061	\$1,232	\$1,490	\$1,641
Low HOME Rent	\$865	\$926	\$1,112	\$1,285	\$1,433

Data Source: FY 2024 HUD Fair Market Rent; FY 2024 HUD HOME Rent Limits for "Grand Traverse County"

Table 26 – Monthly Rent

Table 26 shows HUD Fair Market Rents and HUD HOME Rents within Grand Traverse County. Fair Market Rents (FMRs) are gross rent estimates that include rent plus the cost of all tenant-paid utilities. FMRs are set to the dollar amount at which 40% of the standard-quality rental housing units are rented,

excluding non-market rental housing (e.g. public housing). High HOME Rents are equal to the FMR or 30% of the adjusted income of a family whose income equals 65% AMI, whichever is lower. Low HOME Rents are equal to 30% of the adjusted income of a family whose income equals 50% AMI. For The City of Traverse City, which is located within Grand Traverse County, the Fair Market Rent and High HOME Rent are the same; however, the Low HOME Rent is less for all units.

IS THERE SUFFICIENT HOUSING FOR HOUSEHOLDS AT ALL INCOME LEVELS?

A comparison of the total number of households at the various income levels (see **Table 7**) and the total number of affordable housing units available for the various income levels (see **Table 25**) can reveal surpluses or shortages of affordable housing.

There are 895 very low-income households earning 0-30% HAMFI in the City of Traverse City. Because only 290 affordable rental units are identified in the CHAS database, and an undetermined number of owner units are available, a significant shortage of affordable units likely exists within the City for very low-income households. There does not appear to be a shortage of affordable housing for low-income households. A total of 885 households in the City earn 30-50% HAMFI. According to the CHAS database, 1,020 rental-units and 80 owner-units (a total of 1,100 units) are available and affordable to this income group. There does not appear to be a shortage of affordable housing for moderate income households. A total of 1,145 households in the City earn 50-80% HAMFI. There are approximately 1,995 affordable rental units and 425 affordable owner-units (a total of 2,420 units) available, according to the CHAS database. With this information, there is a shortage of affordable housing in Traverse City for very low-income households in particular.

HOW IS AFFORDABILITY OF HOUSING LIKELY TO CHANGE CONSIDERING CHANGES TO HOME VALUES AND/OR RENTS?

The estimated median home value within Traverse City increased 93% in the last 10 years, according to the 2018-2022 ACS. Over this same period, the City's gross contract rent increased by 34%.

The City's median household income has increased by 60% in the last 10 years. While median home values and contract rent also increased over the last decade, the increase in median home values significantly outpaced the increase in median household income. With higher home values, housing may

become increasingly unaffordable to homeowners. This, combined with the City's lack of smaller housing units, could undermine affordability into the future.

HOW DO HOME RENTS / FAIR MARKET RENT COMPARE TO AREA MEDIAN RENT? HOW MIGHT THIS IMPACT YOUR STRATEGY TO PRODUCE OR PRESERVE AFFORDABLE HOUSING?

The City's current median contract rent is estimated to be \$948 (according to the 2018-2022 ACS). This median contract rent is lower than the Fair Market Rent and the High HOME Rent but is higher than the Low HOME Rents for efficiency and 1-bedroom units.

DISCUSSION

Within The City of Traverse City, there is a potential shortage of units affordable to households of very low-income levels. While home values and rents have increased over the past decade, household income has not kept pace with the increase in housing costs. As housing costs outpace household incomes, housing may become less affordable to all income levels.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

INTRODUCTION

This section describes the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing. Additionally, it provides a summary of the housing stock available to serve persons with disabilities and persons with HIV/AIDS and their families.

DEFINITIONS

The following definitions pertain to this section:

- "Standard condition" A housing unit that meets HUD Housing Quality Standards (HQS) and all
 applicable state and local codes.
- "Substandard condition but suitable for rehabilitation" A housing unit that contains one or more housing condition (defined below), contains a lead-based paint hazard, and/or is condemned as unfit for human habitation but is both structurally and financially feasible to rehabilitate.
- "Substandard condition not suitable for rehabilitation" A housing unit that contains one or more housing condition (defined below), contains a lead-based paint hazard, and/or is

condemned as unfit for human habitation and is not structurally or financially feasible to rehabilitate.

Additionally, the term "abandoned vacant unit" is defined by HUD as:

- A housing unit that has been foreclosed upon and vacant for at least 90 days.
- A housing unit where no mortgage or tax payments have been made by the property owner for at least 90 days.
- A housing unit where a code enforcement inspection has determined that the property is not habitable, and the owner has taken no corrective actions within 90 days of the notification of the deficiencies.

TABLE 27: CONDITION OF UNITS

Condition of Units	Owner-Occupied		Renter-Occupied		
	Number	%	Number	%	
With one selected Condition	789	18%	1,272	47%	
With two selected Conditions	0	0%	20	0%	
With three selected Conditions	0	0%	0	0%	
With four selected Conditions	0	0%	0	0%	
No selected Conditions	3,588	82%	1,435	53%	
Total	4,377	100%	2,727	100%	

Data Source: 2018-2022 ACS

Table 27 - Condition of Units

Table 27 shows the condition of occupied housing units within Traverse City, with a breakdown of owner-occupied units and renter-occupied units. As defined by HUD, a housing "condition" includes the following:

- A housing unit that lacks complete plumbing facilities
- A housing unit that lacks complete kitchen facilities
- A housing unit with more than one person per room
- A housing unit with a cost burden greater than 30% of the occupant's household income

According to 2018-2022 ACS data, the majority (82%) of owner-occupied housing units have no housing conditions. Of the remaining owner-occupied housing units, a significant number feature one housing

condition (18%). Of the estimated 8,008 renter-occupied housing units in the City, over half (53%) have no housing conditions. However, nearly half (47%) of renter-occupied units have one housing condition.

TABLE 28: YEAR UNIT BUILT

Year Unit Built	Owner-Occupied		Renter-Occupied		
	Number	%	Number	%	
2000 or later	532	12%	364	13%	
1980-1999	320	7%	490	18%	
1950-1979	1,469	34%	1,087	40%	
Before 1950	2,056	47%	786	29%	
Total	4,377	100%	2,727	100%	

Data Source: 2018-2022 ACS

Table 28 - Year Unit Built

The age of housing within the City of Traverse City is detailed in **Table 28**. Of the 4,377 owner-occupied housing units, approximately 81% were built prior to 1980 and 19% were built after 1980. Of the 2,727 renter-occupied housing units, approximately 69% were built prior to 1980 and only 31% were built after 1980. Over half of the City of Traverse City's housing units were built after 1950, with 47% of owner-occupied units and 29% of renter-occupied units built before 1950.

TABLE 29: RISK OF LEAD-BASED PAINT HAZARD

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	3,525	80.5%	1,873	68.6%
Housing Units built before 1980 with children present	220	5%	80	3%

Data Source: 2018-2022 ACS (Total Units); 2016-2020 CHAS (Units with Children present)

Table 29 - Risk of Lead-Based Paint

The risk of lead-based paint hazards within Traverse City is estimated in **Table 29**. Because the actual number of housing units in the City with lead-based paint is not available, an assumption must be made. For the purposes of this plan, a housing unit built before 1980 is presumed to have a higher risk of lead-based paint. Therefore, the table shows the total number of owner-occupied and renter-occupied units that were built before 1980, as well as those built before 1980 with children present. The data for this table is from the 2018-2022 ACS and 2016-2020 CHAS.

As shown in **Table 29**, 3,525 or about 80.5% of owner-occupied housing units in the City were built prior to 1980, while 220 or 5% were built before 1980 and have children present. For renter-occupied housing units, 1,873 or 68.6% were built prior to 1980, while 80 or 3% were built prior to 1980 and have children present. Although there is a high percentage of owner-occupied housing units built before 1980, there is a low percentage of owner-occupied housing units with children present. Similarly, the percentage of renter-occupied housing units built before 1980 and built before 1980 with children present is low.

TABLE 30: VACANT UNITS

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	910	288	1,198
Abandoned Vacant Units	N/A	N/A	N/A
REO Properties	N/A	N/A	2
Abandoned REO Properties	N/A	N/A	N/A

Data Source: 2018-2022 ACS (Vacant Units); RealtyTrac Database, Accessed June 2024

Table 30 - Vacant Units

According to 2018-2022 ACS data, there are a total of 1,198 vacant housing units within the City of Traverse City (see **Table 30**). As defined in the American Community Survey a housing unit is vacant if no one is living in it at the time of interview. Units occupied at the time of interview entirely by persons who are staying two months or less and who have a more permanent residence elsewhere are considered temporarily occupied and are classified as "vacant." An estimated 910 housing units are both vacant and suitable for rehabilitation based on the percentage of units built prior to 1980.

According to RealtyTrac Database, accessed June 2024, there were a total of 2 real-estate owned properties in Traverse City. In 2020, because of moratoriums on foreclosures and evictions due to the coronavirus (COVID-19) pandemic, data regarding the status of foreclosures (i.e., default, auction, preforeclosure, or real estate/bank owned) is limited.

NEED FOR OWNER AND RENTAL REHABILITATION

In terms of housing quality, 18% of owner-occupied housing units in the City have at least one housing condition, while 47% of renter-occupied housing units have at least one housing condition (see **Table 27**). Relative to the age of housing, 47% of the City's owner-occupied units were built prior to 1950, while 29% of renter-occupied units were built prior to 1950 (see **Table 28**). Although the exact number

of homes with lead-based paint is not known, it is assumed that housing units in the City built prior to 1980 have a higher risk of lead-based paint hazards. About 81% of owner-occupied homes and 69% of renter-occupied homes were built prior to 1980. Generally, these statistics point toward the need for Traverse City to facilitate both owner-unit and rental-unit rehabilitations within its jurisdiction.

ESTIMATED NUMBER OF HOUSING UNITS OCCUPIED BY LOW- OR MODERATE-INCOME FAMILIES WITH LBP HAZARDS

Table 29 notes that, in Traverse City, 3,525 owner-occupied housing units were built prior to 1980 and 1,873 renter-occupied housing units were built prior to 1980. These units are assumed to have a higher risk of lead-based paint hazards.

As of the 2018-2022 ACS, there are an estimated 7,104 occupied housing units within The City of Traverse City. Approximately 76% of these housing units are assumed to have a higher risk of lead-based paint hazards. According to 2016-2020 CHAS data, approximately 2,925 low- or moderate-income households (earning less than or equal to 80% HAMFI) reside in The City of Traverse City. Therefore, an estimated 2,223 low- and moderate-income families may live in housing units that have a higher risk of lead-based paint hazards.

DISCUSSION

In terms of housing conditions, a greater percentage of renter-occupied units have housing conditions than owner-occupied units. Over two-thirds of the City's housing units (whether vacant or occupied) were built prior to 1980. Due to the combination of housing conditions and unit age, there is a need for The City of Traverse City to facilitate both owner-unit and rental-unit rehabilitations. It is estimated that approximately 5,398 housing units may have a higher risk of lead-based paint hazards.

MA-25 Public and Assisted Housing – 91.210(b)

INTRODUCTION

As was noted earlier in Section NA-35, the Traverse City Housing Commission (TCHC) administers housing assistance for low- and very-low-income persons in the greater the City of Traverse City area. The operations of the TCHC are funded through annual appropriations provided by HUD.

TABLE 31: TOTALS NUMBER OF UNITS

Program Type									
	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total	Project	Tenant	Special Purpose Voucher		
					-based -b	-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers available	-	-	138	204	-	-	0	0	0
# of accessible units	-	-	-	-	-	-	-	-	-

Data Source: PIC (PIH Information Center)

Table 31 - Total Number of Units by Program Type

DESCRIBE THE SUPPLY OF PUBLIC HOUSING DEVELOPMENTS

The TCHC administers programs that deliver housing assistance to low- and very low-income persons in Traverse City. These include public housing and special purpose voucher activities. Combined, these activities supply approximately 342 public or assisted housing units in the greater The City of Traverse City area (see **Table 31**).

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

DESCRIBE THE NUMBER AND PHYSICAL CONDITION OF PUBLIC HOUSING UNITS IN THE JURISDICTION, INCLUDING THOSE THAT ARE PARTICIPATING IN AN APPROVED PUBLIC HOUSING AGENCY PLAN

Table 32 shows the total number of units currently assisted by local, state or federally funded programs. Approximately 138 public housing units are programmed within the City of Traverse City. **Table 31** notes that there are 204 vouchers, which are administered by the TCHC.

TABLE 32: PUBLIC HOUSING CONDITION

Public Housing Development	Average Inspection Score
Riverview Terrace Apartments	91c

Data Source: REAC Physical Inspections Scores and Release Dates, Updated June 30, 2023

Table 32 – Public Housing Condition

DESCRIBE THE RESTORATION AND REVITALIZATION NEEDS OF PUBLIC HOUSING UNITS IN THE JURISDICTION

The Traverse City Housing Commission owns and operates Riverview Terrace apartments, among other units; in general, housing providers in the community continuously seek to rehabilitate the supply of housing affordable to low- and very-low-income persons, specifically seeking to provide ADA accessibility for disabled populations and seniors.

DESCRIBE THE PUBLIC HOUSING AGENCY'S STRATEGY FOR IMPROVING THE LIVING ENVIRONMENT OF LOW- AND MODERATE-INCOME FAMILIES RESIDING IN PUBLIC HOUSING

The TCHC operates the Riverview Terrace apartments and operates the Family-Self-Sufficiency program for current housing clients to provides hands on coaching to qualified families for job training, financial management and other life skills. The family self-sufficiency program brings together a group of local agencies including schools, job training programs, childcare and service providers for the purpose of providing resources to complete goals. The goal of the family self-sufficiency program is to assist families in achieving economic independence.

DISCUSSION

The City works cooperatively with the TCHC and private entities in the provision of public and subsidized housing within The City of Traverse City.

MA-30 Homeless Facilities and Services – 91.210(c)

INTRODUCTION

What is perhaps critical to the success of homeless services is the capacity to coordinate systems of care beyond sheltering, healthcare, mental health counseling, employment, etc. and the ability to follow a case through a myriad of providers to ensure that individual or family is transitioned out of homelessness.

Meeting homelessness challenges in Traverse City is a collaborative effort comprising numerous individuals, agencies, and organizations. The Greater Grand Traverse Area Continuum of Care is responsible for collecting homeless data, conducting homeless needs assessments, and developing community supported homelessness strategies. The Greater Grand Traverse Area Continuum of Care supports the communities of Grand Traverse County, including the City of Traverse City. The Greater Grand Traverse Area Continuum of Care seeks to prevent, reduce, and end homelessness.

The Greater Grand Traverse Area Continuum of Care is responsible for advancing community-wide efforts, including the 10-Year Plan to End Homelessness and the Annual Point-In-Time (PIT) survey, which involves various partnering agencies. Most of the data utilized in this section of the Plan was gathered from the Greater Grand Traverse Area Continuum of Care and the Department of Housing and Urban Development.

TABLE 33: FACILITIES AND HOUSING TARGETED TO HOMELESS HOUSEHOLDS

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	42	55	3	164	-
Households with Only Adults	71	71	2	109	-
Chronically Homeless Households	-	-	-	20	-
Veterans	4	-	0	22	-
Unaccompanied Youth	8	1	1	0	-

Table 33 – Facilities and Housing Targeted to Homeless Households

Data Source: HUD 2023 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report for Grand Traverse, Antrim, Leelanau Counties CoC

DESCRIBE MAINSTREAM SERVICES, SUCH AS HEALTH, MENTAL HEALTH, AND EMPLOYMENT SERVICES TO THE EXTENT THOSE SERVICES ARE USED TO COMPLEMENT SERVICES TARGETED TO HOMELESS PERSONS

Several mainstream providers offer services to the homeless population as well low- and moderate-income populations. These providers include, but are not limited to, the following organizations:

Medical/Healthcare Resources

- Northwest Michigan Health Services, Inc: 954 Business Park Dr #2, Traverse City, MI 49686
- Munson Healthcare: 1105 Sixth St. Traverse City, MI 49684
- Traverse Health Clinic Community Health Center: 1719 S. Garfield Avenue, Traverse City, MI
 49686

Mental Health Resources

- Pine Rest: 1050 Silver Dr. Traverse City, MI 49684
- NAMI Grand Traverse: 1212 Veterans Dr. #201, Traverse City, MI 49684
- Northwest Michigan Health Services: 10767 Traverse Highway, Traverse City, MI 49684
- Northern Lakes Community Mental Health: 105 Hall St. Suite A, Traverse City, MI 49684

Employment Resources

- Northwest Michigan Works!: 1209 S. Garfield Avenue, Suite C, Traverse City, MI 49686
- Disability Network Northern Michigan: 415 East Eighth St, Traverse City, 49686
- Traverse Connect: 202 East Grandview Parkway, Traverse City, MI 49684
- Northwestern Michigan College (Workplace Readiness Courses): Several Locations throughout the region

LIST AND DESCRIBE SERVICES AND FACILITIES THAT MEET THE NEEDS OF HOMELESS PERSONS, PARTICULARLY CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS AND THEIR FAMILIES, AND UNACCOMPANIED YOUTH. IF THE SERVICES AND FACILITIES ARE LISTED ON SCREEN SP-40 INSTITUTIONAL DELIVERY STRUCTURE OR SCREEN MA-35 SPECIAL NEEDS FACILITIES AND SERVICES, DESCRIBE HOW THESE FACILITIES AND SERVICES SPECIFICALLY ADDRESS THE NEEDS OF THESE POPULATIONS

Several non-profit providers and faith-based organizations offer services to the homeless population, which include emergency shelter. These providers include, but are not limited to, the following organizations:

- Jubilee House: 325 Washington St, Traverse City, MI 49684
- Child and Family Services of Northwestern Michigan: 3785 Veterans Drive, Traverse City, Michigan 49684
- Northwest Michigan Community Action Agency: 3963 Three Mile Rd, Traverse City, Michigan
 49686
- Goodwill Northern Michigan: 2279 South Airport Rd W, Traverse City, Michigan 49684
- Women's Resource Center: 720 S Elmwood, Suite 2, Traverse City, Michigan 49684

MA-35 Special Needs Facilities and Services – 91.210(d)

INTRODUCTION

This section describes facilities and services that assist persons who are not homeless but require supportive housing and programs. These populations may include elderly and frail elderly, persons with disabilities, persons with alcohol or drug addictions, persons with HIV/AIDS, or other groups. Such facilities and services include units that are barrier-free and physically accessible, units with on-site supportive services such as case management, counseling and healthcare, and units that are affordable to persons on a fixed or limited income.

INCLUDING THE ELDERLY, FRAIL ELDERLY, PERSONS WITH DISABILITIES (MENTAL, PHYSICAL, DEVELOPMENTAL), PERSONS WITH ALCOHOL OR OTHER DRUG ADDICTIONS, PERSONS WITH HIV/AIDS AND THEIR FAMILIES, PUBLIC HOUSING RESIDENTS AND ANY OTHER CATEGORIES THE JURISDICTION MAY SPECIFY, AND DESCRIBE THEIR SUPPORTIVE HOUSING NEEDS

Elderly & Frail Elderly

The elderly, and particularly the frail elderly, require supportive housing, including units that are barrier-free and accessible to the disabled, units with on-site supportive services, and units that are affordable to persons on a fixed-income. The elderly population with housing needs continue to be an area of focus in the City of Traverse City. CDBG funds may be used to assist with maintenance so that the elderly can remain in their homes for as long as possible. Those with fixed incomes, such as the elderly and disabled, are particularly affected by the increasing costs of utilities and fuel. Not only the increased utility costs, but also increased food and other costs can leave them in a financial crisis. There are not enough resources or funds to provide fully for this population; however, several organizations in Grand Traverse County provide support to this population.

Persons with Disabilities (Mental, Physical, Developmental)

Disabled persons require barrier-free housing that is also affordable. Accessibility retrofits tend to be expensive and homes with such features tend to be higher in value. In contrast, income levels for the disabled (mentally, physically, or developmentally) tend to be lower than median area income, resulting in affordability concerns. While new multi-family units are required to have accessibility for such populations, older units tend to be lacking such features. Moreover, persons with mental or developmental disabilities often require supportive housing that includes on-site services. Several organizations exist within Grand Traverse County to serve this population.

Persons with Alcohol or Drug Addictions

Persons with addictions may require temporary housing and treatment. This type of housing can include beds for extended stay and counseling rooms for on-site services. In Michigan, services for persons with alcohol or drug addictions are coordinated by the Office of Recovery Oriented Systems of Care (OROSC) in the Michigan Department of Public Health through a network of local agencies. Additionally, there are several organizations within Grand Traverse County that provide substance abuse services. These include Beacon Recovery Center, Catholic Human Services, Northern Michigan Regional Entity, and Bear River health, among others.

Persons with HIV/AIDS

Persons living with HIV/AIDS face particular challenges to obtain supportive housing. Many are experiencing physical disability, loss of employment, and lack of income resulting in a need for more stable housing. The City of Traverse City does not receive an annual allocation of Housing Opportunities for People with AIDS (HOPWA).

Other Groups

Persons leaving a violent domestic situation are often homeless at first. The availability of emergency and transitional housing is critical to prevent their return to such a situation. Most of the needs for this group are related to shelter and counseling. Runaway youth require similar housing and counseling services.

DESCRIBE PROGRAMS FOR ENSURING THAT PERSONS RETURNING FROM MENTAL AND PHYSICAL HEALTH INSTITUTIONS RECEIVE APPROPRIATE SUPPORTIVE HOUSING

Households with mental or physical health issues face barriers to safe, decent, and affordable housing. Often, persons with mental or physical issues are discharged from institutions but are then unable to find independent housing that they can afford or reasonably maintain. A number of homeless people are discharged from institutions with no other housing options. The City of Traverse City will work with homeless service providers, including the Greater Grand Traverse Area Continuum of Care, to implement a cohesive, community-wide discharge coordination policy that can be successfully implemented to ensure that persons being discharged from publicly funded agencies and institutions do not become homeless upon release.

SPECIFY THE ACTIVITIES THAT THE JURISDICTION PLANS TO UNDERTAKE DURING THE NEXT YEAR TO ADDRESS THE HOUSING AND SUPPORTIVE SERVICES NEEDS IDENTIFIED IN ACCORDANCE WITH 91.215(E) WITH RESPECT TO PERSONS WHO ARE NOT HOMELESS BUT HAVE OTHER SPECIAL NEEDS. LINK TO ONE-YEAR GOALS. 91.315(E)

The City of Traverse City seeks to assist low-income households with their housing and community development needs, and these programs may also be supportive to persons with special needs. These programs may include:

- Rental Assistance
- Shelter operations, including wrap-around services and case management.

FOR ENTITLEMENT/CONSORTIA GRANTEES: SPECIFY THE ACTIVITIES THAT THE JURISDICTION PLANS TO UNDERTAKE DURING THE NEXT YEAR TO ADDRESS THE HOUSING AND SUPPORTIVE SERVICES NEEDS IDENTIFIED IN ACCORDANCE WITH 91.215(E) WITH RESPECT TO PERSONS WHO ARE NOT HOMELESS BUT HAVE OTHER SPECIAL NEEDS. LINK TO ONE-YEAR GOALS (91.220(2))

See response, above (previous question and response).

MA-40 Barriers to Affordable Housing – 91.210(e)

NEGATIVE EFFECTS OF PUBLIC POLICIES ON AFFORDABLE HOUSING AND RESIDENTIAL INVESTMENT

This section requires the jurisdiction to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include land use controls, zoning ordinances, building codes, and policies that affect the return on residential investment.

The City of Traverse City has several strategies that it utilizes to remove or ameliorate the negative effects of public policies that are barriers to affordable housing. The following is a summary of these barriers and corresponding strategies:

1. Zoning Ordinances

- Barrier In general, zoning ordinances and building codes are potential barriers to
 affordable housing, as they restrict density and limit housing types in locations that would
 otherwise be suitable for affordable housing ultimately excluding lower income
 households from many neighborhoods.
- Strategy The City of Traverse City's current code does not present a direct barrier in that it
 requires housing meets minimum standards per the State's building codes. The City will
 continue to evaluate zoning ordinances in relation to affordable housing production,
 particularly regarding economic pressures and limitations in fast-growing areas of the City.

2. Aging Housing Stock

 Barrier – The lack of quality housing units for low-income persons is a barrier to affordable housing. Strategy – The City of Traverse City may seek partnerships for funding/assistance for rehabilitation of older housing units and construction of new affordable units that benefit low- and moderate-income households.

3. Land Values

- Barrier The City of Traverse City's land values continue to rise, which increases housing
 costs and creates competition, even with the public sector, in acquiring property for public
 benefit.
- Strategy The City of Traverse City will work with agencies that promote and develop
 affordable housing and, where feasible, use other sources of funding to help develop housing
 for low- and moderate-income families.

4. Construction Costs

- Barrier The cost of housing construction has increased in proportion to the rise in land values and materials cost. Building affordable housing is as expensive as purchasing property on which to construct it.
- Strategy Where possible and appropriate, the City of Traverse City invokes the use of
 alternative labor in housing programs through self-help initiatives such as Habitat for
 Humanity and other initiatives.

In general, The City of Traverse City will continue to work with non-profit housing developers and providers to increase the supply of affordable housing.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

INTRODUCTION

The Consolidated Plan provides a concise summary of the City's priority non-housing community development needs that are eligible for assistance. The following section describes the economic development needs of the City of Traverse City.

This section also provides data regarding the local economic condition of the jurisdiction and compares the ability of the local work force to satisfy the needs of local businesses. Much of this data can be used to describe the level of housing demand in the local market.

This section discusses the following topics:

- Business by Sector
- Labor Force
- Occupations by Sector
- Travel Time to Work
- Educational Attainment
- Median Earnings in the Past 12 Months
- Additional Narrative

ECONOMIC DEVELOPMENT MARKET ANALYSIS

TABLE 34: BUSINESS ACTIVITY

Business by Sector	Number of Workers	Number of Jobs	Share of Workers	Share of Jobs	Jobs less workers
			%	%	%
Agriculture, forestry, fishing and hunting, and mining	18	225	0%	1%	1%
Construction	121	419	2%	2%	-1%
Manufacturing	673	1,784	13%	7%	-6%
Wholesale trade	148	256	3%	1%	-2%
Retail trade	525	2,793	10%	11%	1%
Transportation and warehousing, and utilities	161	555	3%	2%	-1%
Information	69	448	1%	2%	0%
Finance and insurance, and real estate and rental and leasing	491	2,066	10%	8%	-1%
Professional, scientific, and management, and administrative and waste management services	814	1,779	16%	7%	-9%
Educational services, and health care and social assistance	1539	10,967	30%	43%	13%
Arts, entertainment, and recreation, and accommodation and food services	314	2,095	6%	8%	2%
Other services, except public administration	156	680	3%	3%	0%
Public administration	86	1,389	2%	6%	4%
Total	5,115	25,231	100%	100%	N/A

Data Source: 2018-2022 ACS (Workers), 2021 Longitudinal Employer-Household Dynamics, OnTheMap Tool (Jobs)

Table 34 – Business Activity

Information provided in **Table 34** identifies workers and jobs within the City of Traverse City by sector. This information is divided into 13 sectors by number of workers, number of jobs and then calculations of the ratio of workers to jobs by business sector. According to the 2018-2022 ACS, there are 5,115 workers within all business sectors identified in the City of Traverse City. The number of jobs within all sectors is estimated to be 25,231 according to 2021 Longitudinal Employer-Household Dynamics data published by the U.S. Census Bureau.

The largest share of workers is within the Education and Health Care Services sector (30%), Professional, Scientific, and Management Sector (16%), and Manufacturing sector (13%). Workers in the Retail Trade and Finance/Insurance and Real Estate Sectors comprise 10%, each. Workers in the Information, Public Administration, and Agriculture, Mining, Oil and Gas Extraction, and Construction sectors comprise the smallest percentage or workers (2% or less, each).

Regarding the share of jobs, the largest share of jobs is within the Educational Services and Healthcare sector (43%). Jobs in the Retail Trade sector (11%); Arts, Entertainment, Recreation, Accommodation, and Food Services (8%); and Finance, Insurance, and Real Estate Sector (8%) are also well-represented. The Agriculture, Mining, Oil & Gas Extraction, and Wholesale Trade sectors account for the smallest percentages of jobs (less than 1% each).

By comparing the share of workers to share of jobs, it can be determined within which sectors there are deficiencies to be addressed. The calculation of "jobs less workers" is the percentage of jobs less the percentage of workers. A negative number reflects an oversupply of labor for the sector. As **Table 34** shows, within the City of Traverse City there are, proportionally, fewer jobs than workers within six business sectors: Transportation, Warehousing, and Utilities; Finance, Insurance, and Real Estate; Professional, Scientific, and Management; Wholesale Trade; Manufacturing; and Construction. This oversupply of labor means that workers in these business sectors may have more difficulty finding a job that matches their skillset. Though, it should be noted that there are notably more jobs available in Traverse City than there are people in the labor force. In contrast, there may be more jobs than workers in five business sectors: Educational Services and Healthcare; Arts, Entertainment, Accommodations; Public Administration; Retail Trade; and Agricultural sectors. This means that workers from outside The City of Traverse City are meeting the needs of the local job market for these business sectors, possibly because not enough skilled workers reside within the City of Traverse City.

TABLE 35: LABOR FORCE

Total Population in the Civilian Labor Force*	8,314
Civilian Employed Population 16 years and over	8,307
Unemployment Rate	3.4%
Unemployment Rate for Ages 16-24	17.8%
Unemployment Rate for Ages 25-65	3.7%

Data Source: 2018-2022 ACS

*Universe: Population 16 years and over

Table 35 - Labor Force

Table 35 portrays the labor force within the City of Traverse City. According to the 2018-2022 ACS the total population within the City in the civilian labor force is 8,314. This number includes the number of civilian workers plus those actively seeking employment and does not include those who are not actively seeking employment.

When looking at the civilian labor force ages 16 years and over, 7,866 are employed and 441 are unemployed. According to 2018-2022 ACS estimates, the City's unemployment rate is 3.4%. The unemployment rate for ages 16-24 is much higher than for the City as a whole. The unemployment rate for those between the ages of 16-24 is approximately 17%, while for ages 25-65 the unemployment rate is approximately 4%.

TABLE 36: OCCUPATIONS BY SECTOR

Occupations by Sector	Number of People*	Median Earnings (\$)
Management, business and financial	3,296	61,031
Farming, fisheries, and forestry occupations	0	No Data
Service	1,689	33,549
Sales and office	1,551	49,122
Construction, extraction, maintenance, and repair	348	49,063
Production, transportation, and material moving	789	46,226

Data Source: 2018-2022 ACS

Table 36 - Occupations by Sector

Table 36 displays occupations by Sector within the City of Traverse City according to the 2018-2022 ACS: Management, Business and Financial occupations account for the largest number of occupations. The Sales and Office and Service sectors are also well-represented. The least represented sector in The City of Traverse City is Farming, Fisheries and Forestry Occupations (0). Of these occupations, median earnings are highest in the Management, Business, and Financial occupations, whereas median earnings are lowest in the Service occupations.

^{*}Universe: Civilian employed population 16 years and over with earnings (past 12 months)

TABLE 37: TRAVEL TIME

Travel Time	Number*	Percentage
< 30 Minutes	5,566	84.2%
30-59 Minutes	752	11.4%
60 or More Minutes	288	4.4%
Total	6,606	100%

Data Source: 2018-2022 ACS

Table 37 - Travel Time

As shown in **Table 37**, a large majority of Traverse City residents commute less than 30 minutes to work (84.2%). A notable percentage travel 30-59 minutes (11.4%) with a small percentage commuting more than one hour 4.4%).

EDUCATION:

TABLE 38: EDUCATIONAL ATTAINMENT BY EMPLOYMENT STATUS (POPULATION 16 AND OLDER)

Educational Attainment*	In Labo	Not in Labor	
	Civilian Employed Unemployed		Force
Less than high school graduate	177	3	149
High school graduate (includes equivalency)	760	85	318
Some college or Associate's degree	2,024	104	505
Bachelor's degree or higher	3,276	43	398

Data Source: 2018-2022 ACS

Table 38 - Educational Attainment by Employment Status

Table 38 displays Educational Attainment by Employment Status within the City of Traverse City, the highest numbers of employed are those with a Bachelor's degree or higher. A significant number of employed also have some college or an Associate's degree. A sizeable number of the civilian employed population has a High School diploma or equivalency and a very small percentage never graduated from High School.

Unemployment data shows that unemployment is quite low; however, those with Some College or Associate's degree have the highest numbers of unemployment. For those who never graduated high school, there is a significant portion of people who are not in the labor force, almost equal to the number of people who are in the labor force.

^{*}Universe: Workers 16 years and over not working at home

^{*}Universe: Population 25 to 64 years (Civilian)

TABLE 39: EDUCATIONAL ATTAINMENT BY AGE

	Age*					
	18-24 yrs	25–34 yrs	35–44 yrs	45-65 yrs	65+ yrs	
Less than 9th grade	0	39	0	32	46	
9th to 12th grade, no diploma	177	40	67	151	142	
High school graduate, GED, or alternative	293	384	272	507	790	
Some college, no degree	551	519	478	677	923	
Associate's degree	326	279	118	562	119	
Bachelor's degree	27	628	603	1,030	759	
Graduate or professional degree	0	490	369	604	839	

Data Source: 2018-2022 ACS

*Universe: Population 18 years and over

Table 39 - Educational Attainment by Age

Table 39 shows Educational Attainment by Age. A small population over the age of 18 (5%) in Traverse City did not graduate from high school. A significant number of adults (42%) graduated from high school or have some college education but no college degree. Combined, approximately 47% of the population 18 years or older (6,088 adults) do not have a college degree.

TABLE 40: EDUCATIONAL ATTAINMENT – MEDIAN EARNINGS IN THE PAST 12 MONTHS

Educational Attainment	Median Earnings in the Past 12 Months (\$)
Less than high school graduate	\$30,857
High school graduate (includes equivalency)	\$34,864
Some college or Associate's degree	\$34,726
Bachelor's degree	\$54,468
Graduate or professional degree	\$58,277

Data Source: 2018-2022 ACS

Table 40 - Median Earnings in the Past 12 Months

Table 40 identifies income over a 12-month period as it relates to educational attainment in Traverse City based on 2018-2022 ACS estimates. Greater educational attainment strongly correlates with increased income over a 12-month period. In Traverse City, persons having a graduate or professional degree have an estimated median income of \$58,277 and persons having a Bachelor's degree have a median income of \$54,468. In contrast, persons with some college or an Associate's degree have a median of \$34,726. Similarly, those with a high school diploma or equivalency have a median income of \$34,864 and those without a high school diploma or equivalency have a median income of \$30,857.

^{*}Universe = Population 25 years and over w/earnings

^{**2019} inflation-adjusted dollars

BASED ON THE BUSINESS ACTIVITY TABLE ABOVE, WHAT ARE THE MAJOR EMPLOYMENT SECTORS WITHIN YOUR JURISDICTION?

The major employment sectors in Traverse City are Education and Health Care Services sector (30%), Professional, Scientific, and Management Sector (16%), and Manufacturing sector (13%). Combined, these employment sectors represent 59% of all available jobs in the city.

DESCRIBE THE WORKFORCE AND INFRASTRUCTURE NEEDS OF THE BUSINESS COMMUNITY

The data show that there may be more jobs than workers in five business sectors: Educational Services and Healthcare; Arts, Entertainment, Accommodations; Public Administration; Retail Trade; and Agricultural sectors. This means that workers from outside The City of Traverse City are meeting the needs of the local job market for these business sectors, possibly because not enough skilled workers reside within The City of Traverse City.

While a large percentage of Traverse City's population has a college education, this population may work outside of Traverse City in the broader Grand Traverse region, which in turn leaves the local job market to be met by workers living outside of the City. Moreover, a large percentage of the population does not have a college degree. With that, there may be a demand for adult basic education, workforce training and other education opportunities to better match the needs of these business sector employers with local workers skilled in these areas. With that, a number of private and public educational institutions, as well as workforce training initiatives, are available in Grand Traverse County to address this demand.

DESCRIBE ANY MAJOR CHANGES THAT MAY HAVE AN ECONOMIC IMPACT, SUCH AS PLANNED LOCAL OR REGIONAL PUBLIC OR PRIVATE SECTOR INVESTMENTS OR INITIATIVES THAT HAVE AFFECTED OR MAY AFFECT JOB AND BUSINESS GROWTH OPPORTUNITIES DURING THE PLANNING PERIOD. DESCRIBE ANY NEEDS FOR WORKFORCE DEVELOPMENT, BUSINESS SUPPORT OR INFRASTRUCTURE THESE CHANGES MAY CREATE

As a popular summer vacation destination, Traverse City competes for year-round business development with other established and growing towns in Grand Traverse County. Thus, the City must position itself to facilitate economic development. With that said, The City of Traverse City has been one of the more successful areas in terms of economic development, both through tourism and seasonal economies and for year-round residents. Numerous businesses have invested in the Traverse City area, many of which are locally owned, small businesses.

HOW DO THE SKILLS AND EDUCATION OF THE CURRENT WORKFORCE CORRESPOND TO EMPLOYMENT OPPORTUNITIES IN THE JURISDICTION?

Of the unemployed labor force in The City of Traverse City, 41.6% has a Bachelor's degree or higher and 35.4% has some college or an Associate's degree. Nearly 95% has at least High School diploma or equivalency and 5% never graduated from High School.

As **Table 34** shows, within the City of Traverse City there are, proportionally, fewer jobs than workers within six business sectors: Transportation, Warehousing, and Utilities; Finance, Insurance, and Real Estate; Professional, Scientific, and Management; Wholesale Trade; Manufacturing; and Construction. This oversupply of labor means that workers in these business sectors may have more difficulty finding a job that matches their skillset.

DESCRIBE ANY CURRENT WORKFORCE TRAINING INITIATIVES, INCLUDING THOSE SUPPORTED BY WORKFORCE INVESTMENT BOARDS, COMMUNITY COLLEGES AND OTHER ORGANIZATIONS. DESCRIBE HOW THESE EFFORTS WILL SUPPORT THE JURISDICTION'S CONSOLIDATED PLAN

The following workforce training initiatives are available to persons living and working in Traverse City and Grand Traverse County:

- Northwest Michigan Works!
- Traverse Connect
- Northwestern Michigan College

These initiatives support the development of a skilled workforce to meet the employment demands of the local job market.

DOES YOUR JURISDICTION PARTICIPATE IN A COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGY (CEDS)?

Yes, through Networks Northwest, Traverse City participates in the 2021 Comprehensive Economic Development Strategy for Northwest Lower Michigan Region, which includes Grand Traverse County.

IF SO, WHAT ECONOMIC DEVELOPMENT INITIATIVES ARE YOU UNDERTAKING THAT MAY BE COORDINATED WITH THE CONSOLIDATED PLAN? IF NOT, DESCRIBE OTHER LOCAL/REGIONAL PLANS OR INITIATIVES THAT IMPACT ECONOMIC GROWTH

The following are activities to attract more business and create more jobs in Traverse City:

- Downtown Development Authority (DDA)
- The City of Traverse City Master Plan (2017, with update in progress for 2024)
- Economic Development Efforts (coordinated through the City Departments)
 - Redevelopment Ready Community
- Municipal Services Department activities (e.g., planning projects, public works projects, etc.)
- Public Safety Department activities (e.g., public safety efforts)

Each of these activities overlap and can be coordinated with the Consolidated Plan.

DISCUSSION

According to the 2018-2022 ACS, the City of Traverse City civilian labor force is comprised of approximately 8,300 people, of which approximately 97% are employed. Like in most cities, higher median earnings generally correlate with higher education. The highest median earnings in the City of Traverse City are in occupations such as Management, Business, and Financial, while the lowest median earnings are in Service occupations.

Approximately 42% of the City of Traverse City's population has no college degree, which is an impediment to employment opportunities and higher earnings. While there may be a need in the City of Traverse City for workforce training to match employers with skilled employees, there are also several workforce training initiatives in Grand Traverse County to address this need.

A large portion of the labor force in Traverse City's population drives less than 30 minutes to get to work, and a very small portion drives nearly an hour to get to work. This means that most workers live locally or within the greater Traverse City and Grand Traverse County region.

MA-50 Needs and Market Analysis Discussion

ARE THERE AREAS WHERE HOUSEHOLDS WITH MULTIPLE HOUSING PROBLEMS ARE CONCENTRATED? (INCLUDE A DEFINITION OF "CONCENTRATION")

The City seeks to focus most of its CDBG-funded activities in eligible block groups (i.e., areas of low- and moderate-income concentration). Generally, these same areas are also disproportionately affected by housing problems, such as overcrowding, substandard conditions, or significant cost burden. Because of the age of Traverse City's housing stock, housing problems are distributed throughout the City's limits.

ARE THERE ANY AREAS IN THE JURISDICTION WHERE RACIAL OR ETHNIC MINORITIES OR LOW-INCOME FAMILIES ARE CONCENTRATED? (INCLUDE A DEFINITION OF "CONCENTRATION")

The lowest income areas of the City of Traverse City are most affected by housing problems and in need of community investment. Unfortunately, these areas are spread throughout the city.

The following Block Groups have populations where racial or ethnic minorities comprise a percentage of the population that is 10 percentage points higher than the jurisdiction as a whole (i.e., areas where racial or ethnic minorities are concentrated). As a whole, The City of Traverse City has a racial minority population (i.e., any race or combination of races other than White alone) of approximately 8.0%.

As a whole, The City of Traverse City has a Black/African American population of approximately 1.4%. A disproportionally greater (10 percentage points more or higher) concentration of Black/African American population (i.e., 10.4% or greater) does not exist within any Block Group in the city; however, it should be emphasized that the city is predominately White, and there is only a very small Black/African American population.

As a whole, The City of Traverse City has an ethnic minority population of approximately 3.5%. A disproportionally greater (10 percentage points more or higher) concentration of ethnic minority population (i.e., 13%) does not exist within The City of Traverse City, since no Census Tract/Block Group has a percentage of Hispanic/Latino population that exceeds 13.5%.

Some of the areas identified as having high concentrations of racial minority population also have a high percentage of low- and moderate-income households. The data seem to indicate a possible correlation

between concentrations of low income and minority race. As indicated in the previous sections, racial minority, income, and disability status are strong indicators for needing housing assistance through various public housing program types.

WHAT ARE THE CHARACTERISTICS OF THE MARKET IN THESE AREAS/NEIGHBORHOODS?

The City's low- and moderate-income neighborhoods are characterized by predominately single-family units with most commercial properties along the City's major corridors. Major nearby employment centers Textile Product Mills, Beverage & Tobacco Product Manufacturing, Machinery Manufacturing, Building Material & Garden Supply Stores, and Furniture & Home Furnishing Stores. Recent redevelopment activity has attracted retail, service and entertainment sector investment and related employment opportunities; however, increasing land values paired with the lack of diversity in housing stock, has made housing unaffordable. Moreover, these employment sectors are not associated with higher incomes that would offset the high cost of housing.

ARE THERE ANY COMMUNITY ASSETS IN THESE AREAS/NEIGHBORHOODS?

The City continues to invest in its DDA District and to coordinate with Grand Traverse County on economic development activities to better market to attract and retain businesses and develop the City's resident workforce. Like many communities, the community itself is a strong asset for economic development. Organization at the community-level combined with other means, including CDBG assistance, is the primary asset for positive change in the City of Traverse City's low- and moderate-income neighborhoods.

ARE THERE OTHER STRATEGIC OPPORTUNITIES IN ANY OF THESE AREAS?

Strategic opportunities include support of housing rehabilitation efforts and partnerships with non-profits and other housing and service providers (i.e., subrecipients) to address both the need for affordable housing and better employment opportunities in the City of Traverse City.

MA-60 Broadband Needs of Housing Occupied by Lowand Moderate-Income Households – 91.210(a)(4), 91.310(a)(2)

DESCRIBE THE NEED FOR BROADBAND WIRING AND CONNECTIONS FOR HOUSEHOLDS, INCLUDING LOW- AND MODERATE-INCOME HOUSEHOLDS AND NEIGHBORHOODS

According to the National Broadband Availability Map (NBAM) created by the National Telecommunication and Information Administration (NTIA) of the Department of Commerce, as well as the NTIA's BroadbandUSA initiative, broadband internet access is critical in supporting economic opportunity among low- and moderate-income households. Access to the internet supports a household's connection to employment, education, and healthcare, as well as government services and social networks. For example, in today's society, simply applying for a job, completing a homework assignment, or even making a doctor appointment is dependent on internet access. Therefore, all low- and moderate-income neighborhoods need access to broadband wiring and connections in order for residents to participate equitably in society. Although most neighborhoods in the City of Traverse City already have broadband wiring and connections in-place, according to the NTIA, the primary reasons why lower income households do not utilize broadband service are two-fold: (1) there is no working computer in the household and/or (2) internet service subscriptions are unaffordable. Because sufficient service provider coverage already exists in the City of Traverse City (see below), the main barriers to digital inclusion and thus equitable participation in society include limited access to working computers and the high cost of internet service subscriptions.

DESCRIBE THE NEED FOR INCREASED COMPETITION BY HAVING MORE THAN ONE BROADBAND INTERNET SERVICE PROVIDER SERVE THE JURISDICTION

According to the Federal Communications Commission (FCC) Fixed Broadband Deployment Map (https://broadbandmap.fcc.gov), the City of Traverse City is already well-served by broadband providers. The broadband technology available in The City of Traverse City includes ADSL, cable, fiber, fixed wireless, and satellite. As defined by the FCC, broadband capability requires consumers to have access to actual download speeds of at least 25 Mbps and actual upload speeds of at least 3 Mbps (i.e., 25/3 Mbps).

Nearly the entire City is served by 4 or more fixed residential broadband providers at speeds of up to 25/3 Mbps. For typical speeds, the City of Traverse City already has sufficient competition between

broadband service providers. The broadband service providers in these areas include Charter Communications (cable), ViaSat, Inc. (Satellite), LICT Corporation (Fiber), COLI, Inc. (Fixed Wireless), Hughes Network Systems, LLC. (Satellite), T-Mobile USA, Inc. (Fixed Wireless), AT&T, Inc. (ADSL), Cherry Capital Connection, LLC. (Fixed Wireless), and VSAT Systems, LLC (Satellite).

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

DESCRIBE THE JURISDICTION'S INCREASED NATURAL HAZARD RISKS ASSOCIATED WITH CLIMATE CHANGE

Michigan's Great Lakes are expected to be severely impacted by climate change as lakes warm and alter water quality and levels. The City of Traverse City is coastal community in Grand Traverse County with shoreline along Grand Traverse Bay, connecting to Lake Michigan. The Michigan Climate and Health Adaptation Program of the Michigan Department of Health and Human Services has identified several possible effects resulting from climate change that could impact the City of Traverse City in the future. In general, climate change is likely to result in higher average temperatures, a longer frost-free season, and increased total precipitation and frequency of heavy precipitation events. These impacts could increase air pollution and worsen respiratory disease, worsen the heat island effect in urban areas and air mass stagnation, increase flooding and the risk of waterborne diseases, increase vector-borne diseases from mosquitos and ticks fostered by warmer winters and earlier springs, and alter how people use the power grid potentially resulting in power outages, CO poisoning, and other injuries and risks to human life.

In coastal areas in particular, Traverse City can expect increased surface water temperatures, resulting in increased production of blue-green and toxic algae in the lakes. These can harm fish and water wildlife/habitats. Reduced winter ice coverage, coupled with more frequent and intense storms may result in shore erosion and flooding (U.S. Climate Resilience Toolkit).

DESCRIBE THE VULNERABILITY TO THESE RISKS OF HOUSING OCCUPIED BY LOW- AND MODERATE-INCOME HOUSEHOLDS BASED ON AN ANALYSIS OF DATA, FINDINGS, AND METHODS

Comparing the locations of CDBG-eligible low- and moderate-income block groups within The City of Traverse City to Michigan's lakeshore, the City's low- and moderate-income households are located somewhat inland. However, as cited above by the Michigan Department of Health and Human Services,

inland effects could be similarly devastating to low- and moderate-income households. Vulnerability to the risks of climate change may impact transportation and public infrastructure capacity, the cost of utilities (e.g., water and electricity), homeowner insurance, and other housing costs resulting from higher average temperatures, unpredictable and extreme seasonal weather events, and increased flooding. Such impacts will make housing costs increasingly unaffordable to many, putting some households at-risk of homelessness if they cannot afford to relocate. Moreover, according to the U.S. Environmental Protection Agency (EPA) impacts to agricultural production resulting from unpredictable droughts and floods could impact availability and access to food, particularly for low- and moderate-income households. For these risks, strategies are under development by the Michigan Climate and Health Adaptation Program and the State of Michigan's Council on Climate Solutions to ensure that low- and moderate-income households are represented and equitably considered in public policy.



SP-05 Overview

STRATEGIC PLAN OVERVIEW

The Consolidated Plan process requires the City to identify priority needs and a Strategic Plan to meet those needs over the next five years. For every priority, there are goals and objectives established to measure progress, as well as strategies to address them. There are essentially four categories of need defined by HUD in the Consolidated Plan:

- 1. Housing
- 2. Homelessness
- 3. Community Development
- 4. Non-Homeless Special Needs

1. Housing Needs

The Housing category is focused on the physical state and tenure of housing in the City of Traverse City and ways that federal and local resources can be used to address housing issues. Based on input and data received through the public involvement process, the highest housing-related priorities identified by the public are:

- Rental and mortgage assistance
- Housing rehabilitation, accessibility, and affordability
- Housing for seniors (aging in place)

Considering these priorities, the following goal is recommended:

Goal: Housing

Assist with the construction and rehabilitation of affordable housing, and lower economic barriers to such housing, for low- and moderate-income households, seniors, and persons experiencing homelessness.

2. Homelessness Needs

Meeting homelessness challenges in the City of Traverse City is a collaborative effort comprising numerous individuals, agencies, and organizations. The Greater Grand Traverse Area Continuum of Care is the lead agency for collecting homeless data for the Continuum of Care. The Greater Grand Traverse Area Continuum of Care assists in conducting homeless needs assessments and developing community supported homelessness strategies in Grand Traverse County. In developing priority homeless needs, the City of Traverse City did research through the Greater Grand Traverse Area Continuum of Care and obtained input from the general public through public meetings and an online survey.

Based on input and the data received through the citizen participation process, the highest homeless-related priorities identified are facility improvements and services such as:

- Rental and mortgage assistance (i.e., foreclosure prevention)
- Shelter upgrades
- Homeless prevention (i.e., homeless services)

Considering these priorities, the following goal is recommended:

Goal: Homelessness

Support shelters and services for persons experiencing homelessness or persons at-risk of homelessness.

3. Non-Housing Community Development Needs

Non-Housing Community Development is a broad category of spending that covers many types of public facilities and improvements such as roads, sewer improvements, water improvements, wastewater improvements, lighting, drainage, community centers, parks, and virtually any other public project that benefits low- and moderate-income neighborhoods.

Based on the needs assessment, input received through the citizen participation process, including public meetings, the following priority community development needs were identified:

- Road conditions and maintenance
- Pedestrian/bicycle safety, sidewalks, and street lighting
- Parks, libraries, and public facilities
- Public infrastructure improvements (e.g., water, stormwater)
- Youth Services
- Mental Health Services

Considering these priorities, the following goal is recommended:

Goal: Community and Economic Development

Support community and economic development projects and services, including but not limited to public facility or infrastructure improvements and social services, in qualifying low- and moderate-income areas.

4. Non-Homeless Special Needs

Non-Homeless Special Needs is a broad category that applies to any population that is presumed to be low- and moderate-income and in need of public services. The category covers a large population, including the mentally ill, developmentally disabled, elderly, and other groups. These specific services are often provided by non-profit agencies, usually in coordination with The City of Traverse City or Grand Traverse County.

Based on input and the data received through the citizen participation process, the highest priorities identified by the public are:

- Mental health services
- Senior services
- Services and programs for special needs populations (i.e., persons with disabilities)
- Aging in place (e.g., housing-related ADA accessibility improvements)

Considering these priorities, the following goal is recommended:

Goal: Non-Homeless Special Needs

Support the needs of the community's aging population by improving the accessibility of housing, public facilities, and services for seniors and persons with disabilities.

SP-10 Geographic Priorities

GENERAL ALLOCATION PRIORITIES

Describe the basis for allocating investments geographically within the City.

Some CDBG assisted activities, such as parks, neighborhood facilities, community centers and streets, serve an identified geographic area. These activities generally meet the low- and moderate-income (LMI) principal benefit requirement if 51 percent of the residents in the activity's service area are low and moderate income. In order for a Census Block Group to qualify as a low- and moderate-income area, a Block Group in the City must contain 51.00% or more low/mod population. According to the 2024 Low- and Moderate-Income Data Summary, 25% of all Census Block groups within Traverse City have an LMI population of more than 51%.

The **Low- and Moderate-Income Map** shows the block groups in the city that have greater than 51.00% low- and moderate-income populations.

The City of Traverse City has not designated any target areas for this Consolidated Plan. In the future, the City may consider adopting a target area for the Consolidated Plan. As this is the first year the City is receiving funds as an entitlement grantee, the City seeks to support low- and moderate-income populations citywide (see **Table 41**).

TABLE 41: GEOGRAPHIC AREA

1. Area Name: Citywide

Area Type: Local Target Area

Identify the neighborhood boundaries for this target area.

Traverse City Boundary

Include specific housing and commercial characteristics of this target area.

Housing within the City of Traverse City is characterized by primarily single-family detached homes and multi-family unit structures. Traverse City has a downtown commercial center along E. Front Street, as well as numerous other commercial establishments throughout the city.

How did your consultation and citizen participation process help you to identify this neighborhood as a target area? The public participation process identified a widespread need for services throughout the city. As a first-time entitlement grantee, the City of Traverse City used this input to determine the best course of action is to proceed without a specific target area, and provide support to populations citywide.

Identify the needs in this target area.

The needs, as identified in the public participation process, are widespread; however, there is a strong need for affordable housing, rental assistance, shelter support/upgrades, mental health resources, ADA accessibility, and housing for seniors to age in place.

What are the opportunities for improvement in this target area?

Addressing homelessness and the lack of affordable housing throughout the city is a primary need. Additional opportunities for improvement are public facilities upgrades, including sidewalk improvements, utility improvements, and public park improvements.

Are there barriers to improvement in this target area?

The primary barrier to improvement citywide is a lack of funding availability. Limited funding limits the amount of support the city can provide to various groups in need.

Table 41 - Geographic Priority Areas

SP-25 Priority Needs

The Five-Year Consolidated Plan must indicate the general priorities for allocating investment of available resources among different needs. Priority needs are those that will be addressed by the goals outlined in the Strategic Plan. For each priority, the City of Traverse City has indicated one or more populations to be served, as well as an assigned priority level indicating relative importance among the needs listed (see **Table 42**).

TABLE 42: PRIORITY NEEDS SUMMARY

Priority Need Name	Priority Level	Population	Geographic Areas	Goals Addressing
Mental Health Services	High	Low/Moderate Income, Special Needs	Citywide	Community and Economic Development
Homeless Shelter Upgrades	High	Low/Moderate Income, Homeless	Citywide	Homeless
Rental Assistance	High	Low/Moderate Income, Homeless	Citywide	Housing
Accessible and Affordable Housing	High	Low/Moderate Income, Non- Homeless Special Needs	Citywide	Housing
Homeless Services and Prevention	High	Homeless	Citywide	Homelessness
Public Facilities and Infrastructure	Low	Low/Moderate Income	Citywide	Community and Economic Development
Supportive Services for Low- and Moderate- Income Populations	High	Low/Moderate Income	Citywide	Community and Economic Development
Programs and Services for Special Needs	High	Non-Homeless Special Needs	Citywide	Non-Homeless Special Needs
Aging in Place	Low	Special Needs	Citywide	Housing, Non-Homeless Special Needs
Program Administration	Low	Low/Moderate Income	Citywide	Program Administration

Table 42 - Priority Needs Summary

SP-30 Influence of Market Conditions

TABLE 43: INFLUENCE OF MARKET CONDITIONS

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Tenant-based vouchers are a common voucher used in the City. The average annual income of residents using TBRA is less than \$12,000. This voucher continues to be critical for persons with extremely low incomes who are severely cost burdened. It is estimated that while approximately 174 TBRA vouchers are in use, approximately, 900 households in Traverse City have extremely low incomes.
TBRA for Non-Homeless Special Needs	Non-Homeless Special Needs populations have a high need for TBRA, while at the same time needing improved accessibility within housing. Due to their limited income, housing needs for those with non-homeless special needs include affordability, availability of assistance, accessibility improvements and Fair Housing options.
New Unit Production	In general, a shortage of affordable housing exists for lower income groups, including both renter and owner households earning less than 80% HAMFI. The current housing inventory lacks rental units to house persons with low- and extremely low- incomes (less than 50% HAMFI). New unit production related to owner-occupied homes consists mainly of high priced, larger, single-family homes. The City has a shortage of accessible homes for seniors.
Rehabilitation	Many of renter-occupied housing units have at least one housing problem, while a small number of owner-occupied housing units have at least one housing problem. Furthermore, a very high percentage of owner-occupied housing units and renter-occupied were built prior to 1980 and are more than 40 years old. Generally, these statistics point toward the need to continue home rehabilitations to improve the condition of housing within its jurisdiction.
Acquisition, including preservation	Housing preservation/restoration within the city and for low- and moderate-income households throughout the City were identified during the public participation process with regard to the expense associated with preserving/restoring homes and obstacles to demolition in cases of ageing and unsafe structures.

Table 43 – Influence of Market Conditions

SP-35 Anticipated Resources

INTRODUCTION

The Five-Year Consolidated Plan must identify the federal, state, local and private resources expected to be available to the City to address priority needs and specific objectives identified in the Strategic Plan.

These resources are summarized in **Table 44**.

The City of Traverse City anticipates a total allocation of \$365,323 in CDBG funding for the 2024/2025 program year. Program income may be realized over the course of the 2024/2025 program year and subsequent program years. These funds will be used for CDBG eligible activities consistent with the goals identified in the Five-Year Consolidated Plan. Over the next five years, any CDBG funds allocated to the City will be used for housing and community development activities including, but not limited to, homeless shelter and services, rental unit construction, rental assistance, public services, public improvements, and administration of the City's CDBG program.

Other resources, such as private and non-Federal public sources may become available to the City during the program year. For CDBG leveraging, these include funding from State and Federal grant sources, City departments, public or social service providers, or other sources. The City will also look to leverage funds, if available, from other agencies and programs against CDBG dollars.

The Annual Action Plan must summarize the City's priorities and the specific goals it intends to initiate and/or complete within the first year of the Strategic Plan. These goals must be described in quantitative terms. The City of Traverse City has selected goal outcome indicators and quantities based on the anticipated performance measures of the 2024/2025 Annual Action Plan. See **Table 48**.

TABLE 44: ANTICIPATED RESOURCES

	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount	
Program			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Available Remainder of Consolidated Plan \$	Narrative Description
CDBG	Public, Federal	Acquisition Admin and Planning Economic Development Homelessness	\$365,323	\$0	\$0	\$365,323	\$1,461,292	Additional resources for leveraging may include other State and Federal grant
		Housing Public Improvements Public Services						sources, City Departments, public or social service providers or other sources of funding.

Table 44 – Anticipated Resources

EXPLAIN HOW FEDERAL FUNDS WILL LEVERAGE THOSE ADDITIONAL RESOURCES (PRIVATE, STATE AND LOCAL FUNDS), INCLUDING A DESCRIPTION OF HOW MATCHING REQUIREMENTS WILL BE SATISFIED.

The City will look to leverage funds, if available, from State and Federal grants sources, City departments, public or social service providers, or other sources against CDBG dollars. The City will look to leverage funds, if available, from other agencies and programs against CDBG dollars. The City shall assure that the requirements as it relates to non-federal share will be utilized as referenced in 24 CFR 570.201 (3) (g), for any project in which CDBG funding is used as the non-federal match. In the future, the City will continue to aggressively pursue funding from private, public, and federal sources to address economic and community development needs.

IF APPROPRIATE, DESCRIBE PUBLICLY OWNED LAND OR PROPERTY LOCATED WITHIN THE JURISDICTION THAT MAY BE USED TO ADDRESS THE NEEDS IDENTIFIED IN THE PLAN.

If available and appropriate, the City of Traverse City may utilize publicly owned land and/or property in a combination of ways to provide parks and public facilities and to continue to offer services and programs to City residents. Excess property shall be disposed of pursuant to local, state, and federal laws, and income derived from related properties shall be returned to its appropriate funding source.

Currently, City owned land is dedicated to public facilities and parks. These amenities are used to provide services and programs available to all City residents including seniors, youth, special needs populations, and low-income households. Also, the City aims to make all City facilities and parks ADA accessible for residents that live with a disability. The City will make every effort to continue to make all City owned programs, parks, and facilities accessible for all residents.

DISCUSSION

The City of Traverse City's anticipated funding allocation from the Federal CDBG program will address many of the City's goals over the next five years, including housing, homelessness, community and economic development, non-homeless special needs, and program administration. The City is fortunate to have a network of public or social service providers to help address these goals through financial leveraging, coordination, and collaboration, in partnership with City departments and other agency funding sources.

SP-40 Institutional Delivery Structure

EXPLAIN THE INSTITUTIONAL STRUCTURE THROUGH WHICH THE JURISDICTION WILL CARRY OUT ITS CONSOLIDATED PLAN INCLUDING PRIVATE INDUSTRY, NON-PROFIT ORGANIZATIONS, AND PUBLIC INSTITUTIONS.

The City of Traverse City will have staff funded through CDBG administration dollars that will be dedicated to making sure the CDBG Program is fully administered. The City will also work with the following organizations throughout the implementation of the CDBG Program.

TABLE 45: INSTITUTIONAL DELIVERY STRUCTURE

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served	
The City of Traverse City Planning and Zoning Department	Government Agency	Planning, Community Development	Jurisdiction	
The Greater Grand Traverse Area Continuum of Care – Goodwill Northern Michigan	Nonprofit Organization	Homelessness	Region	

Table 45 - Institutional Delivery Structure

ASSESS THE STRENGTHS AND GAPS OF THE INSTITUTIONAL DELIVERY STRUCTURE

Table 45 shows the institutional structure through which the City of Traverse City will carry out its Strategic Plan. Although not every organization involved in the program of delivery is included in **Table 45**, the lead agency and other organizations presented show the breadth of delivery capacity within the City.

The lead agency for institutional delivery is the City of Traverse City Planning and Zoning Department, along with other City departments. These departments' carryout objectives related to housing and community development.

The City will meet regularly with stakeholders to review the progress of the CDBG program, and hold key meetings, including public hearings, which result in recommendations to the Traverse City City Commission regarding plan projects and funding levels. It will also make recommendations regarding amendments to the program, such as the addition of new projects, the reprogramming of funds, and the cancellation of nonperforming activities. It will scrutinize the performance of subrecipient service

agencies and makes funding recommendations based on agency success in reaching promised benchmarks.

Furthermore, there are multiple nonprofit organizations that provide a range of public services, from programs to reduce homelessness to programs for non-homeless special needs populations. The Greater Grand Traverse Area Continuum of Care – Goodwill Northern Michigan is the lead agency for collecting homeless data for the Continuum of Care. The Greater Grand Traverse Area Continuum of Care assists in conducting homeless needs assessments and developing community supported homelessness strategies in Grand Traverse County.

The City of Traverse City has a strong Institutional delivery system. A wide range of services are available in the community, including homelessness prevention services, street outreach services, supportive services, and other services such as youth programs (see **Table 46**). These programs are provided by nonprofit organizations and the Continuum of Care (CoC).

TABLE 46: AVAILABILITY OF SERVICES TARGETED TO HOMELESS PERSONS AND PERSONS WITH HIV AND MAINSTREAM SERVICES

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics		X	
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	Χ	X	
Education	X	X	
Employment and Employment Training	Х	Х	
Healthcare	X	X	
HIV/AIDS	X		Х
Life Skills	X		
Mental Health Counseling	Х		
Transportation	X		
Other			
Food Banks/Nutrition Programs	X		
Youth Programs	X		

Table 46 - Homeless Prevention Services Summary

DESCRIBE HOW THE SERVICE DELIVERY SYSTEM INCLUDING, BUT NOT LIMITED TO, THE SERVICES LISTED ABOVE MEET THE NEEDS OF HOMELESS PERSONS (PARTICULARLY CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS AND THEIR FAMILIES, AND UNACCOMPANIED YOUTH)

Meeting homelessness challenges in the City of Traverse City is a collaborative effort comprising numerous individuals, agencies, and organizations. The Greater Grand Traverse Area Continuum of Care – Goodwill Northern Michigan is the lead agency for collecting homeless data for the Continuum of Care. The Greater Grand Traverse Area Continuum of Care assists in conducting homeless needs assessments and developing community supported homelessness strategies in Grand Traverse County. The Continuum of Care (CoC) for the area consists of numerous agencies. The Greater Grand Traverse Area Continuum of Care is also responsible for advancing community-wide efforts, including the Annual Point-in-Time (PIT) survey conducted by the CoC, which involves various partnering organizations.

DESCRIBE THE STRENGTHS AND GAPS OF THE SERVICE DELIVERY SYSTEM FOR SPECIAL NEEDS POPULATION AND PERSONS EXPERIENCING HOMELESSNESS, INCLUDING, BUT NOT LIMITED TO, THE SERVICES LISTED ABOVE.

To improve the housing and community development delivery system in the City of Traverse City, better coordination between and amongst the public, nonprofit and private agencies will be required. The programs and services that exist and that are available to residents in Traverse City are extensive and varied. Further, all the agencies identified exhibit a commitment to providing these services. However, the agencies that participate in Traverse City's delivery system will need to operate in a more comprehensive and cohesive manner. At times, these services and programs are provided with little cooperation between and amongst the many other agencies that make up the housing and community development delivery system network which causes a duplication of services.

The City of Traverse City views the Consolidated Plan development process as an opportunity to bring together the public, non-profit, and private organizations that provide housing and community development services in the City of Traverse City. Through the City's Citizen Participation Plan, which was developed to maintain contact with the public, the city hopes to provide enough public forums and meetings throughout the year to create a greater awareness of housing and community development activities which may lead to better coordination over the next five years.

PROVIDE A SUMMARY OF THE STRATEGY FOR OVERCOMING GAPS IN THE INSTITUTIONAL STRUCTURE AND SERVICE DELIVERY SYSTEM TO ADDRESS PRIORITY NEEDS.

Although the City of Traverse City coordinates with homeless and public service providers, better coordination between these agencies and with the public and private sector organizations will be a high priority during the next five years.

The City of Traverse City is strongly committed to meeting the underserved needs in the community. A key strength within the program delivery system is the broad base of community support and partnerships available within the area. The primary gap in the delivery of services is the lack of adequate financial resources to best serve the City's needs. In general, there is an increasing lack of resources from local, state, and federal sources. The scope of services needed for low- and moderate-income households often exceeds any combination of resources.

SP-45 Goals Summary

TABLE 47: FIVE-YEAR GOALS SUMMARY INFORMATION

Goal Name	Description	Category	Start Year	End Year	Objective	Outcome	Geographic Area	Priority Needs Addressed	Funding Allocated (Five-Year Total)	Goal Outcome Indicator	Quantity (Five-Year Total)	Unit of Measure (UoM)
Housing	Assist with the construction and rehabilitation of affordable housing, and lower economic	Housing	2024	2028	Decent Housing	Affordability	Citywide	Rental Assistance Accessible and Affordable Housing Aging in Place	CDBG - \$1,113,625 (61%)	Rental Units Constructed	4	Household/Housing Units
	barriers to such housing, for low- and moderate-income households, seniors, and								CDBG - \$250,000 (14%)	Tenant Based Rental Assistance/Rapid Rehousing	225	Households Assisted
	persons experiencing homelessness.								CDBG - \$109,596 (6%)	Public Service Activities other than Low/Moderate Income Housing Benefit	90	Persons Assisted
Homelessness	Support shelters and services for persons experiencing homelessness or persons at-risk	Homelessness	2024	2028	Decent Housing; Suitable Living Environment	Availability/ Accessibility	Citywide	Homeless Shelter Upgrades Homeless Services and Prevention	CDBG - \$50,000 (3%)	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	200	Persons Assisted
	of homelessness.								CDBG - \$164,394 (9%)	Public Service Activities other than Low/Moderate Income Housing Benefit	120	Persons Assisted
									CDBG - \$50,000 (3%)	Homeless Person Overnight Shelter	90	Persons Assisted
Non-Homeless Special Needs	Support the needs of the community's aging population by improving the accessibility	Non-Homeless Special Needs	2024	2028	Suitable Living Environment	Availability/ Accessibility	Citywide	Programs and Services for Special Needs Aging in Place	CDBG - \$0 (0%)	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	0	Persons Assisted
	of housing, public facilities, and services for seniors and persons with disabilities.									Public Service Activities other than Low/Moderate Income Housing Benefit	0	Persons Assisted
Community and Economic Development	Support community and economic development projects and services, including	Community Development	2024	2028	Suitable Living Environment; Creating	Sustainability	Citywide	Public Facilities and Infrastructure Supportive Services for Low- and Moderate-Income Populations	CDBG - \$0 (0%)	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	0	Persons Assisted
	but not limited to public facility or infrastructure improvements and social services, in qualifying low- and moderate-income areas.				Economic Opportunities			Mental Health Services		Public Service Activities other than Low/Moderate Income Housing Benefit	0	Persons Assisted
Program Administration	Program Administration	Program Administration	2024	2028	N/A	N/A	Citywide	Program Administration (Indirect Need)	CDBG - \$89,000 (5%)	Other	0	Other

Table 47 – Goals Summary

Note: 20% of CDBG Entitlement Grant will be reserved for Administration and Planning Activities

ESTIMATE THE NUMBER OF EXTREMELY LOW-INCOME, LOW-INCOME, AND MODERATE-INCOME FAMILIES TO WHOM THE JURISDICTION WILL PROVIDE AFFORDABLE HOUSING AS DEFINED BY HOME 91.315(B)(2)

The Five-Year Consolidated Plan must summarize the City's priorities and the specific goals it intends to initiate and/or complete within the five-year term of the Strategic Plan. These goals must be described in quantitative terms. The City of Traverse City has selected funding allocations, goal outcome indicators and quantities using past and anticipated performance measures from its Annual Action Plans. These performance measures have been projected over the course of the five-year period to arrive at a total five-year funding allocation and quantity for each outcome indicator. See **Table 47**.

Through annual CDBG allocations, the City will provide rental assistance to support on average 45 income-eligible household annually, or approximately 225 households over the next five years. Additionally, the City proposes to construct approximately four (4) new rental units over the next five years. In total, approximately 229 income-eligible households will be provided affordable housing with CDBG funding. An estimated 90 persons will be provided with housing counseling and related public services toward obtaining affordable housing.

SP-50 Public Housing Accessibility and Involvement

NEED TO INCREASE THE NUMBER OF ACCESSIBLE UNITS (IF REQUIRED BY A SECTION 504 VOLUNTARY COMPLIANCE AGREEMENT)

According to the Traverse City Housing Commission, the number of disabled families getting assistance totals 125. In addition, 305 families are requesting accessibility features. This data shows that a high number of disabled families need both housing assistance/vouchers and accessible units. Additionally, 92 program participants are elderly (>62 years) and may also need accessible units.

ACTIVITIES TO INCREASE RESIDENT INVOLVEMENTS

The Traverse City Housing Commission, alongside local service providers, intend to continue promoting several resident initiatives. The City of Traverse City will work within its power to broaden public housing residents' knowledge of their rights, knowledge, HUD's perspective on issues, and various resident initiatives that can be explored and implemented at various points in time.

IS THE PUBLIC HOUSING AGENCY DESIGNATED AS TROUBLED UNDER 24 CFR PART 902?

No.

IF APPLICABLE, PLAN TO REMOVE THE 'TROUBLED' DESIGNATION

Not applicable.

SP-55 Barriers to Affordable Housing

BARRIERS TO AFFORDABLE HOUSING

This section requires the jurisdiction to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include land use controls, zoning ordinances, building codes, and policies that affect the return on residential investment.

The City of Traverse City has identified various relevant public policies that could potentially affect the availability of affordable housing. In some cases, these public policies may be considered barriers to affordable housing, in which case the City will address strategies to eliminate or minimize such a negative effect on the affordable housing opportunities in The City of Traverse City. Traverse City 's housing codes are not, in and of themselves, barriers to affordable housing due to the fact that the codes simply guarantee housing that meets minimum standards.

STRATEGY TO REMOVE OR AMELIORATE THE BARRIERS TO AFFORDABLE HOUSING

The City of Traverse City has reviewed the extent to which the cost or incentives to develop, maintain or improve affordable housing in the jurisdiction are affected by State or local policies. There are many barriers to affordable housing that may increase the costs, act as disincentives to development or create barriers to the production or maintenance of housing for low-income families.

The City of Traverse City may undertake the following actions to remove barriers to affordable housing productions, which shall vary over the planning period.

- Continue to assess and use local building codes to simply guarantee housing that meets minimum standards.
- Consistent with local priorities, foster the quality siting of manufactured housing.
- Where possible and appropriate, promote the use of alternative labor in housing programs through self-help initiatives such as Habitat for Humanity.
- Provide funding for owner-occupied rehabilitation for households with incomes at or below 80% of Area Median Income (AMI).
- Work with agencies that promote and develop affordable housing, where feasible and use other sources of funding provide affordable housing for families.

The City of Traverse City will continue to avoid all barriers to affordable housing as it has in the past. In many municipalities, the following programs and policies have the potential for creating barriers to affordable housing, and thus are a matter of interest for The City of Traverse City:

- Zoning Regulations: The City Zoning Ordinance is a useful tool that was designed to promote the
 health, safety, and welfare of our residents. It does not contain any restrictive, exclusionary
 zoning or excessive subdivision controls that would impose barriers to affordable housing.
- Building Codes: The City adheres to the State guidelines code books, designed to ensure that
 dwelling units are structurally sound and safe for their inhabitants. Such building codes do not
 include any codes which are insensitive to the older housing stock of the City.
- **Development Fees**: The City of Traverse City does not impose an impact fee on developers seeking to take on projects within the municipality.
- Approval and Permitting Systems: The City does not utilize slow procedures that are burdensome and uncoordinated, nor does Traverse City impose repetitive reviews that require developers to incur high costs and lose valuable time.
- Manufactured and Modular Housing: The City of Traverse City permits manufactured and
 modular housing if the development is consistent with the City's Zoning Ordinance and Master
 Plan. The Zoning Ordinance does not impose restrictive barriers on these types of new
 construction.
- Redlining and Secondary Market Practices: The City of Traverse City does not partake in the use
 of such practice

SP-60 Homelessness Strategy

REACHING OUT TO HOMELESS PERSONS (ESPECIALLY UNSHELTERED PERSONS) AND ASSESSING THEIR INDIVIDUAL NEEDS

The City of Traverse City network of homeless service providers consists of shelter and housing providers, service providers, faith-based organizations, local governments, and other entities focused on finding solutions to homelessness. The Greater Grand Traverse Area Continuum of Care – Goodwill Northern Michigan is designated as the lead agency for the homeless services.

ADDRESSING THE EMERGENCY AND TRANSITIONAL HOUSING NEEDS OF HOMELESS PERSONS

One of Traverse City's strategies for preventing and reducing homelessness is to assist non-profit service providers in obtaining additional funding sources for shelter services (e.g., caseworkers/counselors). Many of these non-profit service providers are CoC partnering agencies.

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.

Another of Traverse City's strategies for preventing and reducing homelessness is to promote and encourage the development of programs that facilitate the transition from homelessness into permanent housing. Many of these programs are operated by the CoC partnering agencies.

EXTREMELY LOW-INCOME INDIVIDUALS AND FAMILIES AVOID BECOMING HOMELESS, ESPECIALLY EXTREMELY LOW-INCOME INDIVIDUALS AND FAMILIES WHO ARE LIKELY TO BECOME HOMELESS AFTER BEING DISCHARGED FROM A PUBLICLY FUNDED INSTITUTION OR SYSTEM OF CARE, OR WHO ARE RECEIVING ASSISTANCE FROM PUBLIC AND PRIVATE AGENCIES THAT ADDRESS HOUSING, HEALTH, SOCIAL SERVICES, EMPLOYMENT, EDUCATION OR YOUTH NEEDS

Another of the City's strategies for reducing homelessness is to support non-profit service providers that offer self-sufficiency training, medical care, mental health counseling, case management, and other activities to prevent homelessness. Many of these non-profit service providers are CoC partnering

agencies. Additionally, The City of Traverse City Police Department has a full-time social worker who will work to coordinate with local social service providers.

The non-homeless special needs populations include the elderly, mentally ill, developmentally disabled, physically disabled, substance abusers, and persons with HIV/AIDS or related diseases. The City and other non-profits will provide various types of assistance, primarily through supportive services, to persons with special needs in the community.

SP-65 Lead based paint Hazards

ACTIONS TO ADDRESS LBP HAZARDS AND INCREASE ACCESS TO HOUSING WITHOUT LBP HAZARDS

Lead was used as a pigment and drying agent in "alkyd" oil-based paint in most homes built before 1978. Lead may be present on any interior or exterior surface, particularly on woodwork, doors, and windows. In 1978, the U.S. Consumer Product Safety Commission lowered the legal maximum lead content in most kinds of paint to 0.06% (a trace amount). According to the Commission, about two-thirds of homes built before 1940, one-half of the homes built from 1940 to 1960, and a large number of homes built after 1960 contain heavily leaded paint. Given the age of the City's housing stock, lead paint is presumed to be present in most areas of the City.

The City of Traverse City seeks to take great strides to address lead-based paint hazards before they have a negative effect on our residents. Traverse City will inform its renters and homeowners of potential lead hazards when they apply for and participate in any city-funded housing program.

HOW ARE THE ACTIONS LISTED ABOVE RELATED TO THE EXTENT OF LEAD POISONING AND HAZARDS?

Housing built before 1980 is presumed to have a higher risk of lead-based paint. In the City of Traverse City, over 80% of all housing units were built prior to 1980. Generally, these statistics point toward the need for the City of Traverse City to facilitate both owner-unit and rental-unit rehabilitations within its jurisdiction.

HOW ARE THE ACTIONS LISTED ABOVE INTEGRATED INTO HOUSING POLICIES AND PROCEDURES?

At this time, the City of Traverse City does not anticipate directly funding housing rehabilitation for lead-based paint abatement; however, should this change, each substandard housing unit to be rehabilitated will be inspected and tested by a licensed inspector to identify lead-based paint hazards. A report with the rehabilitation approach and strategy to eliminate lead hazards is issued to the City and the homeowner by the inspector(s).

SP-70 Anti-Poverty Strategy

JURISDICTION GOALS, PROGRAMS AND POLICIES FOR REDUCING THE NUMBER OF POVERTY-LEVEL FAMILIES

According to the 2018-2022 American Community Survey (ACS) estimates, 11.2% of people living in The City of Traverse City are at poverty level or below. This number has decreased since the 2008-2012 ACS, when the poverty rate was 16.3%. Given that the City of Traverse City has a relatively low poverty rate, it should not be ignored that according to the 2018-2022 American Community Survey (ACS) estimates there are still 1,663 persons within the City for which poverty persists. The City of Traverse City and Grand Traverse County have several agencies that provide public services to persons in poverty. These agencies typically provide services to other homeless and non-homeless special needs populations, as well as low- and moderate-income families. These services include housing, job/skills training, and other assistance to promote self-sufficiency. The City of Traverse City will continue to support and collaborate with these agencies to meet the common goal of recusing poverty within The City of Traverse City.

HOW ARE THE JURISDICTION POVERTY REDUCING GOALS, PROGRAMS, AND POLICIES COORDINATED WITH THIS AFFORDABLE HOUSING PLAN?

The City of Traverse City's goals for the Five-Year Consolidated Plan is to address the role of self-sufficiency in protecting and enhancing the condition of the City's housing stock and neighborhoods. Traverse City will continue to work with developers, and nonprofit agencies to enhance rental and owner-occupied housing.

It is very important that Traverse City continues to seek to provide services and programs that will improve their quality of living. The City of Traverse City programs are designed to reduce the number of

poverty level households located within the City through the provision of public services, the creation of economic opportunities and the improvement of physical conditions in low-income areas.

A key element of the anti-poverty strategy is the community's successful coordination with public service providers and nonprofit agencies that work to assist those below the poverty line. A number of services are available to assist homeless and near homeless individuals and families. Better coordination of these services is vital to providing a seamless continuum of care to assist in the transition from homelessness to self-sufficiency.

The City of Traverse City will continue to provide CDBG funding, where appropriate, to support programs that are designed to help families gain self-sufficiency such as childcare programs and job training and creation programs.

The City of Traverse City will take the following steps to promote self-sufficiency and reduce the number of households living below the poverty level while increasing the number of affordable units within the City:

- Increase the supply of standard, affordable housing through the rehabilitation of existing housing units.
- Provide rental assistance to support affordable housing opportunities, especially for those at risk
 of homelessness.
- Support Fair Housing efforts that provide accessibility to all housing options for all City residents.
- Promote homeownership opportunities.

SP-80 Monitoring

DESCRIBE THE STANDARDS AND PROCEDURES THAT THE JURISDICTION WILL USE TO MONITOR ACTIVITIES CARRIED OUT IN FURTHERANCE OF THE PLAN AND WILL USE TO ENSURE LONG-TERM COMPLIANCE WITH REQUIREMENTS OF THE PROGRAMS INVOLVED, INCLUDING MINORITY BUSINESS OUTREACH AND THE COMPREHENSIVE PLANNING REQUIREMENTS

The Planning and Zoning Department is responsible for administering the CDBG program and has regular contact with the public, projects, Traverse City staff, and other agencies that receive funds through this program. Staff monitors activities and provides technical assistance to all other departments and

subrecipient agencies. Staff may provide oversight of projects run by the City, and regular review and oversight of subrecipient programs and progress reports. Staff will be diligent with the timely expenditure of federal funds and has made sure that regulations have been followed prior to the release of funds.

The City of Traverse City shall monitor its Consolidated Plan strategies by utilizing the Consolidated Annual Performance and Evaluation Report (CAPER) to ensure that its community development goals are being carried out in a timely manner. The City is responsible for ensuring that the performance of CDBG program funding meets the national objectives established by Congress and the programmatic requirements established by HUD. Traverse City 's Finance and Budget Department maintains a continual performance monitoring system through the annual single audit at the end of each calendar year and the annual performance report at the end of each CDBG program year which includes HUD's performance measurement reviews.

- Monthly IDIS Drawdown and Reporting Traverse City has an internal program goal of completing CDBG Requests for Reimbursements (drawdowns) in a timely manner. The drawdowns are electronically submitted to HUD via the computer-based Integrated
 Disbursement and Information System (IDIS). Program accomplishments are also reported to HUD via the IDIS on a quarterly basis.
- Pre-award Review Prior to the award of CDBG funds, all awardees receive a pre-contract review to assess the capacity of the agency's administrative and fiscal management systems to successfully complete the proposed activities.
- Post-award Monitoring After funding approval, ongoing monitoring and technical assistance is
 provided on a continual basis as monthly billings are reviewed and processed. In addition, onsite monitoring visits may be conducted at annually.



AP-15 Expected Resources

INTRODUCTION

The Five-Year Consolidated Plan must identify the federal, state, local and private resources expected to be available to the City to address priority needs and specific objectives identified in the Strategic Plan.

These resources are summarized in **Table 44**.

The City of Traverse City anticipates a total allocation of \$365,323 in CDBG funding for the 2024/2025 program year. Program income may be realized over the course of the 2024/2025 program year and subsequent program years. These funds will be used for CDBG eligible activities consistent with the goals identified in the Five-Year Consolidated Plan. Over the next five years, any CDBG funds allocated to the City will be used for housing and community development activities including, but not limited to, homeless shelter and services, rental unit construction, rental assistance, public services, public improvements, and administration of the City's CDBG program.

Other resources, such as private and non-Federal public sources may become available to the City during the program year. For CDBG leveraging, these include funding from State and Federal grant sources, City departments, public or social service providers, or other sources. The City will also look to leverage funds, if available, from other agencies and programs against CDBG dollars.

The Annual Action Plan must summarize the City's priorities and the specific goals it intends to initiate and/or complete within the first year of the Strategic Plan. These goals must be described in quantitative terms. The City of Traverse City has selected goal outcome indicators and quantities based on the anticipated performance measures of the 2024/2025 Annual Action Plan. See **Table 48**.

TABLE 48: ANTICIPATED RESOURCES

		Uses of Funds	E	xpected Amoun	t Available Yea	Expected		
Program	Source of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of Consolidated Plan \$	Narrative Description
CDBG	Public – Federal	Acquisition Admin and Planning Homeless Prevention Economic Development Housing Public Improvements Public Services	\$365,323	\$0	\$0	\$365,323	\$1,461,292	Additional resources for leveraging may include other State and Federal grant sources, City Departments, public or social service providers or other sources of funding.

^{*}HUD 2024 Formula Allocation

Table 48 – Anticipated Resources

EXPLAIN HOW FEDERAL FUNDS WILL LEVERAGE THOSE ADDITIONAL RESOURCES (PRIVATE, STATE AND LOCAL FUNDS), INCLUDING A DESCRIPTION OF HOW MATCHING REQUIREMENTS WILL BE SATISFIED

The City will look to leverage funds, if available, from State and Federal grants sources, City Departments, public or social service providers, or other sources against CDBG dollars. The City will look to leverage funds, if available, from other agencies and programs against CDBG dollars. The City shall assure that the requirements as it relates to non-federal share will be utilized as referenced in 24 CFR 570.201 (3) (g), for any project in which CDBG funding is used as the non-federal match. In the future, the City will pursue funding from private, public, and federal sources to address economic and community development needs.

IF APPROPRIATE, DESCRIBE PUBLICLY OWNED LAND OR PROPERTY LOCATED WITHIN THE JURISDICTION THAT MAY BE USED TO ADDRESS THE NEEDS IDENTIFIED IN THE PLAN

If available and appropriate, the City of Traverse City will utilize publicly owned land and/or property in a combination of ways to provide parks and public facilities and to continue to offer services and programs to City residents. Excess property shall be disposed of pursuant to local, state, and federal laws, and income derived from related properties shall be returned to its appropriate funding source.

Currently, City owned land is dedicated to public facilities and parks. These amenities are used to provide services and programs available to all City residents including seniors, youth, special needs populations, and low-income households. Also, the City aims to make all City facilities and parks ADA accessible for residents that live with a disability. The City will make every effort to continue to make all City owned programs, parks, and facilities accessible for all residents.

DISCUSSION

The City of Traverse City's anticipated funding allocation from the Federal CDBG program will address many of the City's goals over the next five years, including housing, homelessness, community and economic development, non-homeless special needs, and program administration. The City is fortunate to have a network of public or social service providers to help address these goals through financial leveraging, coordination, and collaboration, in partnership with City departments and other agency funding sources.

AP-20 Annual Goals and Objectives

TABLE 49: GOALS SUMMARY INFORMATION

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Priority Needs Addressed	Funding Allocation (One- Year Total)	Goal Outcome Indicator	Quantity (One- Year Total)	Unit of Measure (UoM)
1	Housing	2024	2025	Housing	Citywide	Rental Assistance Accessible and Affordable Housing Aging in Place	CDBG - \$90,525 (25%)	Rental Units Constructed	1	Household/Housing Units
							CDBG - \$50,000 (14%)	Tenant-Based Rental Assistance/Rapid Rehousing	45	Households Assisted
2	Homelessness	2024	2025	Homelessness	Citywide	Homeless Shelter Upgrades Homeless Services and Prevention	CDBG - \$50,000 (14%)	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	200	Persons Assisted
							CDBG - \$54,798 (15%)	Public Service Activities other than Low/Moderate Income Housing Benefit	120	Persons Assisted
							CDBG - \$50,000 (14%)	Homeless Person Overnight Shelter	90	Persons Assisted
5	Program Administration	2024	2025	Program Administration	Citywide	Program Administration [Indirect Need]	CDBG - \$70,000 (19%)	Other	0	Other

Table 49 – Goals Summary Information

TABLE 50: GOAL DESCRIPTIONS

1	Goal Name	Housing
	Goal Description	Assist with the construction and rehabilitation of affordable housing, and lower economic barriers to such housing, for low- and moderate-income households, seniors, and persons experiencing homelessness. CDBG - \$140,525
2	Goal Name	Homelessness
	Goal Description	Support shelters and services for persons experiencing homelessness or persons at-risk of homelessness. CDBG - \$154,798
5	Goal Name	Program Administration
	Goal Description	Program Administration CDBG - \$70,000

Table 50 - Goal Descriptions

AP-35 Projects

INTRODUCTION

The City of Traverse City's planned actions for the 2024/2025 Annual Action Plan are intended to support housing and community development for the City's low- and moderate-income populations as well as the City's homeless and special needs groups.

The City will operate its CDBG program through the Planning and Zoning Department, which will provide funding for rental assistance and new rental unit construction. These actions will address the priority needs of improving the availability and accessibility of affordable housing, including aging in place, and rental assistance, in the City of Traverse City.

The City will coordinate with providers of shelter and services for the homeless, to prevent homelessness and promote access to safe and clean shelters for persons experiencing homelessness. During the 2024/2025 program year, the City will fund shelter upgrades and staffing for caseworkers/counselors to assist persons experiencing homelessness.

The City of Traverse City's planned actions for the 2024/2025 Annual Action Plan are summarized in **Table 51** and **Table 52**.

TABLE 51: PROJECT INFORMATION

#	Project Name
1	Shelter Upgrades and Capacity Support
2	Rental Units Constructed
3	Rental Assistance
4	Program Administration/Planning

Table 51 – Project Information

^{*}Activities are public service – subject to 15% cap

DESCRIBE THE REASONS FOR ALLOCATION PRIORITIES AND ANY OBSTACLES TO ADDRESSING UNDERSERVED NEEDS

The one-year allocation priorities are focused on three goals of the Strategic Plan: Housing, Homelessness, and Program Administration. It is important to note that total funding for public services is capped at 15% of the total CDBG allocation. Total funding for activities related to administration is capped at 20% for CDBG.

Strategic Plan Goal	CDBG (% of Total Award)*
Housing:	\$140,525 (38.5%)
Homelessness:	\$154,798 (42.4%)
Non-Homeless Special Needs:	\$0 (0%)
Community and Economic Development:	\$0 (0%).
Program Administration:	\$70,000 (19.2%)

^{*}Includes program income and prior year resources. Percentages may not equal 100% due to rounding.

The City's primary obstacle to meeting underserved needs is a lack of funding. This is the City's first year as an entitlement grantee in the CDBG program. In general, the extent of underserved needs exceeds that of funding available. The coronavirus pandemic (i.e., COVID-19) has exacerbated unemployment rates, poverty, and other impacts. Generally, increasing demand for public services is placing an additional burden on public service agencies within the City. Furthermore, the housing market acts as an obstacle to addressing underserved need. Within the City of Traverse City housing prices have been increasing dramatically in recent years, making homes less affordable for lower income families.

AP-38 Project Summary

TABLE 52: PROJECT SUMMARY INFORMATION

	Project Name	Shelter Upgrades and Capacity Support
	Target Area	None [Citywide]
	Goals Supported	Homelessness
1	Needs Addressed	Homeless Shelter Upgrades Homeless Services and Prevention
	Funding	CDBG: \$100,000 – Shelter Upgrades (Seasonal/Day) CDBG: \$54,798 – Staffing at Shelters [Total CDBG - \$154,798]
	Description	Shelter facility upgrades (seasonal/day) and staffing salary support for caseworkers/counselors to assist persons experiencing homelessness
	Planned Activities	Shelter Upgrades and Capacity Support
	Project Name	Rental Units Constructed
	Target Area	None [Citywide]
	Goals Supported	Housing
2	Needs Addressed	Accessible and Affordable Housing Aging in Place
	Funding	CDBG: \$90,525
	Description	Construction of new affordable rental units
	Planned Activities	Rental Units Constructed
	Project Name	Rental Assistance
	Target Area	None [Citywide]
	Goals Supported	Housing
3	Needs Addressed	Rental Assistance
	Funding	CDBG: \$50,000
	Description	Rental assistance for income-qualified residents for up to 6 months
	Planned Activities	Rental Assistance
	Project Name	General Administration/Planning
	Target Area	None [Citywide]
	Goals Supported	Program Administration
4	Needs Addressed	Program Administration
	Funding	CDBG: \$70,000
	Description	General administration and planning for the City's CDBG program
	Planned Activities	General Administration/Planning

Table 52 – Project Summary Information

AP-50 Geographic Distribution

DESCRIPTION OF THE GEOGRAPHIC AREAS OF THE ENTITLEMENT (INCLUDING AREAS OF LOW-INCOME AND MINORITY CONCENTRATION) WHERE ASSISTANCE WILL BE DIRECTED

For the 2024/2025 Annual Action Plan, the City of Traverse City will direct assistance to low- and moderate-income areas citywide (See **Table 53**). Assistance will also be made available City-wide to persons meeting the CDBG eligibility requirements for low- and moderate-income benefit.

TABLE 53: GEOGRAPHIC DISTRIBUTION

Target Area	Percentage of Funds
Citywide	100%

Table 53 - Geographic Distribution

RATIONALE FOR THE PRIORITIES FOR ALLOCATING INVESTMENTS GEOGRAPHICALLY

The City of Traverse City's rationale for allocating investments geographically is dependent upon the location of low- and moderate-income populations, which are scattered throughout the City.

DISCUSSION

The City of Traverse City has identified four (4) projects to implement three (3) goals of the Strategic Plan during the first year of the 2024/2025 Consolidated Plan. These projects benefit low- and moderate-income persons Citywide, based on income eligibility, and persons experiencing or at-risk of homelessness.

AP-55 Affordable Housing

INTRODUCTION

The City has adopted a Housing goal that places a high priority on providing safe, affordable, and accessible housing to the residents of the City of Traverse City. This goal shall be addressed, in part, by local non-profit organizations and developers that construct new, modestly priced, affordable housing, and by rental assistance programs. In addition, the City shall seek other creative ways to partner with housing providers to increase affordable housing opportunities and means for obtaining such housing.

The Annual Action Plan must specify goals for the number of homeless, non-homeless, and special needs households to be supported within the program year. These numbers are shown in **Table 54** and are inclusive of the affordable housing activities shown in **Table 49**, in addition to other planned housing activities identified in **Table 52**. **Table 55** indicates the number of households to be supported through specific activities, including rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units. For the purposes of this section, the term "affordable housing" is defined in the HOME regulations at 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. [This section replaces the former HUD Table 3B.]

TABLE 54: ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

One Year Goals for the Number of	Households to be Supported
Homeless	0
Non-Homeless	46
Special Needs	0
Total	46

Table 54 – One Year Goals for Affordable Housing by Support Requirement

TABLE 55: ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

One Year Goals for the Number of Households Supported Through:					
Rental Assistance	45				
The Production of New Units	1				
Rehab of Existing Units	6				
Acquisition of Existing Units	0				
Total	46				

Table 55 – One Year Goals for Affordable Housing by Support Type

DISCUSSION

The City will rely on various partners throughout the jurisdiction, and county in assisting its residents in obtaining affordable housing. The City will allocate funding to construction of one new rental unit and providing rental assistance to multiple households during the 2024/2025 program year. These activities will benefit an estimated 46 households in total.

AP-60 Public Housing

INTRODUCTION

This section of the Annual Action Plan describes what actions of the City of Traverse City will take in the 2024/2025 program year to carry out the public housing portion of the Strategic Plan. Below, the City has identified how the 2024/2025 Annual Action Plan will address the needs of public housing during the program year.

ACTIONS PLANNED DURING THE NEXT YEAR TO ADDRESS THE NEEDS TO PUBLIC HOUSING

The Traverse City Housing Commission (TCHC) owns and operates public housing within the City; however, other housing providers in the community continuously seek to rehabilitate the supply of housing affordable to low and very low-income persons. The TCHC administers vouchers to cover the Traverse City area.

Available assistance includes the Housing Choice Voucher Assistance Program, which provides financial rental assistance to eligible individuals and families based upon income. The amount paid for rent and utilities will generally not exceed 30% of income. Family income must be within HUD's guidelines for household size to qualify. Housing units must pass the Housing Quality Standards Inspection per guidelines established by HUD. This program typically has a waiting list.

ACTIONS TO ENCOURAGE PUBLIC HOUSING RESIDENTS TO BECOME MORE INVOLVED IN MANAGEMENT AND PARTICIPATE IN HOMEOWNERSHIP

The City will make efforts to work cooperatively with TCHC, other public housing authorities within Grand Traverse County, and private entities in the provision of public and subsidized housing within the City of Traverse City. Several PHAs administer vouchers in Grand Traverse County and cover the Traverse City area. The City of Traverse City will continue to encourage and refer residents in need of housing to these programs.

IF THE PHA IS DESIGNATED AS TROUBLED, DESCRIBE THE MANNER IN WHICH FINANCIAL ASSISTANCE WILL BE PROVIDED OR OTHER ASSISTANCE

Not applicable.

AP-65 Homeless and Other Special Needs Activities

INTRODUCTION

This section of the Annual Action Plan describes the City of Traverse City's one-year goal, and the specific actions steps it will undertake in the program year to carry out the homeless strategy identified in the Strategic Plan. Additionally, this section addresses any activities related to the supportive housing needs of non-homeless populations.

DESCRIBE THE JURISDICTIONS ONE-YEAR GOALS AND ACTIONS FOR REDUCING AND ENDING HOMELESSNESS

A key component of the City's homeless strategy is to support critical housing and service activities of the Greater Grand Traverse Area Continuum of Care. The City of Traverse City will strive to work with partners that participate with the Greater Grand Traverse Area Continuum of Care, like Northern Michigan Community Action Agency, a countywide consortium of homeless housing and service providers, City and county governments, and agency representatives. The goal is to eliminate homelessness in the Greater Grand Traverse Area Continuum of Care area. The City has allocated funds to address needs at homeless shelters, including staffing, capacity, and supportive services.

REACHING OUT TO HOMELESS PERSONS (ESPECIALLY UNSHELTERED PERSONS) AND ASSESSING THEIR INDIVIDUAL NEEDS

The City of Traverse City will seek to provide outreach and informational sessions to landlords, social service agencies, homeless, and those at-risk of being homeless with the support (and sometimes through) the Continuum of Care. The City has allocated funding for the 2024/2025 program year to address homelessness and prevent it. There are numerous organizations in the region that can support these outreach efforts.

ADDRESSING THE EMERGENCY SHELTER AND TRANSITIONAL HOUSING NEEDS OF HOMELESS PERSONS

The City of Traverse City actively works to build relationships with area shelters and service providers. Referrals are made to the organizations within the Greater Grand Traverse Area Continuum of Care. The organizations within the CoC work collaboratively to determine and address the needs of these specific populations. In 2024, the City has allocated funding to rental assistance and shelters.

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

The City of Traverse City will continue to coordinate with agencies and service providers that provide homeless services to ensure that those that experience homelessness 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.

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

Another of the City's strategies for reducing homelessness is to support non-profit service providers that offer wrap-around supportive services, including self-sufficiency training, medical care, mental health counseling, case management, rental assistance, and other activities to prevent homelessness.

Furthermore, the City will continue to work with homeless service providers and the Greater Grand Traverse Area Continuum of Care to implement a cohesive, community-wide discharge coordination policy that can be successfully implemented to ensure that persons being discharged from publicly funded agencies and institutions do not become homeless upon release.

The non-homeless special needs populations include the elderly, mentally ill, developmentally disabled, physically disabled, substance abusers, and persons with AIDS or related diseases. During the upcoming year, the City and other non-profits will provide various types of assistance, primarily through supportive services, to persons with special needs in the community.

DISCUSSION

The City plans to allocate CDBG funds toward activities to reduce homelessness. The City will continue to offer assistance, advice, and coordination with agencies that provide day and seasonal shelter facilities, case management/counseling, job skills training, vocational tools and other homeless services.

AP-75 Barriers to Affordable Housing

INTRODUCTION

This section of the Annual Action Plan summarizes actions the City of Traverse City will undertake during the program year to reduce barriers to affordable housing and influence whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include land use controls, zoning ordinances, building codes, and policies that affect the return on residential investment.

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

The City of Traverse City has several strategies that it utilizes to remove or ameliorate the negative effects of public policies that are barriers to affordable housing. In general, the City of Traverse City will continue to work with non-profit and for-profit housing developers and providers to increase the amount of affordable housing.

DISCUSSION

The City of Traverse City will continue to avoid all barriers to affordable housing as it has in the past. In many municipalities, the following programs and policies have the potential for creating barriers to affordable housing, and thus are a matter of interest for the City of Traverse City:

Zoning Regulations: The City Zoning Ordinance is a useful tool that was designed to promote the
health, safety, and welfare of our residents. It does not contain any restrictive, exclusionary
zoning or excessive subdivision controls that would impose barriers to affordable housing.

- Building Codes: The City adheres to the State guidelines and code books, designed to ensure
 that dwelling units are structurally sound and safe for their inhabitants. Such building codes do
 not include any codes which are insensitive to the older housing stock of the City.
- Development Fees: The City of Traverse City does not impose an impact fee on developers
 seeking to take on projects within the municipality. The city seeks to support affordable housing
 developers with these types of soft costs.
- Approval and Permitting Systems: The City does not utilize slow procedures that are burdensome and uncoordinated, nor does Traverse City impose repetitive reviews that require developers to incur high costs and lose valuable time.
- **Redlining and Secondary Market Practices**: The City of Traverse City does not partake in the use of such practice.

See also SP-55, "Barriers to Affordable Housing" for more detailed explanations of strategies.

AP-85 Other Actions

INTRODUCTION

This section of the Annual Action Plan describes the City of Traverse City's planned actions to carry out the following strategies outlined in the Strategic Plan:

- Address obstacles to meeting underserved needs;
- Foster and maintain affordable housing;
- Reduce lead-based paint hazards;
- Reduce the number of poverty-level families;
- Develop institutional structure; and
- Enhance coordination.

In addition, the City has identified obstacles to meeting underserved needs and proposed actions to overcome those obstacles.

ACTIONS PLANNED TO ADDRESS OBSTACLES TO MEETING UNDERSERVED NEEDS

The lack of affordable housing and consequent cost of vacant land is one of the primary obstacles to adequate affordable housing stock in the City of Traverse City. In addition, most housing in Traverse City is relatively old, having been built before 1980.

The 2018-2022 American Community Survey lists the median household income for Traverse City at \$70,700. New housing construction is market driven and typically targets higher income homeowners. Development is concentrated in the single-family detached housing and condominiums. The median value for a home in the City of Traverse City in 2022 was \$340,600. Since the City of Traverse City was viewed as a lucrative market for housing of higher income workers.

Residential development in the City of Traverse City is comprised mostly of single family detached housing, condominiums, and larger multi-family units. The latter proves to be a major challenge for the elderly as the City of Traverse City attracts a large retirement and elderly population. According to the 2018-2022 American Community Survey, the City of Traverse City has a total population of 15,468. Currently, there are an estimated 3,618 senior (65+) residents or 23.4% of the population.

Changing economic conditions in Michigan, and the City of Traverse City in particular, have the potential to reduce the safety net and increase economic challenges for highly vulnerable persons at risk of becoming homeless, already homeless, or those special need populations in need of supportive housing.

Low and very low-income homeowners are also finding it difficult to make rent payments and maintain their homes. As such, the City increased its focus on providing rental assistance to those families. Despite the relative affluence of the City of Traverse City, economic stress can adversely affect the City's sales and property tax revenues in addition to user fees, and this is increasing the demand for resources for neighborhood stabilization, public services, capital improvements, and infrastructure support. The City of Traverse City has developed strong relationships with business owners to increase employment opportunities within the City. Businesses have formed relationships with schools and work programs to create more qualified workers.

A significant obstacle to address unmet needs in Traverse City is lack of adequate funding to meet the level of need that exists. To mitigate this obstacle, the City contributes General Fund Revenue where

available to meet community development needs and seeks non-federal funding sources. The City, through the Consolidated Plan, shall seek to target federal funds, and other available resources, to residents that have traditionally not been served, or are underserved by previous programs. A strong emphasis will be placed on programmatic restructure that is not only compliant with changing rules and regulations, but make sense for today's economic climate, and ever-changing community structure.

ACTIONS PLANNED TO FOSTER AND MAINTAIN AFFORDABLE HOUSING

In the Five-Year Consolidated Plan's Strategic Plan, the City states the main housing goal is to provide safe, affordable, and accessible housing to the residents of the City of Traverse City. This goal is addressed, in part, by local non-profit organizations that construct new, modestly priced, affordable houses, or repair existing houses for resale to lower-income, first-time homebuyers. Many of these non-profit organizations also provide down payment assistance to facilitate the purchase of the homes. The City places a high priority on both methods of expanding home ownership for low-income households.

The City of Traverse City's Rental Units Constructed and Rental Assistance projects will support approximately 46 households a year. These affordable housing activities are given high priority, along with the provision of homeless shelter and services.

ACTIONS PLANNED TO REDUCE LEAD-BASED PAINT HAZARDS

In the future, the City may fund a Housing Rehabilitation program, in addition to the Rental Assistance project the City is proposing to fund with CDBG dollars. The City seeks to counsel families on the importance of fair and safe housing, including the dangers of lead-based paint, especially its negative effects on young children. The City of Traverse City will make the necessary modifications to our programs to ensure continued compliance with HUD and the U.S. Congress. These regulations will supersede local regulations.

ACTIONS PLANNED TO REDUCE THE NUMBER OF POVERTY-LEVEL FAMILIES

According to the 2018-2022 American Community Survey (ACS) estimates, 11.2% of all people living in the City of Traverse City are below poverty level. The City of Traverse City does not possess the capacity or manpower to directly improve the poverty status of its citizens. However, the City supports nonprofit groups, County and State efforts to move low-income persons to economic self-sufficiency or to a maximum level of economic independence.

ACTIONS PLANNED TO DEVELOP INSTITUTIONAL STRUCTURE

The City of Traverse City has a strong Institutional Delivery System. A wide range of services are available in the community, including homelessness prevention services, substance abuse services, youth programs, and senior programming. These programs are provided by the City Departments, non-profit organizations, and Continuum of Care (CoC) member agencies.

The City has identified various entities from the public, nonprofit, and private sectors that will be institutionally involved in the implementation of the Consolidated Plan. To improve the housing and community development delivery system in the City of Traverse City, better coordination between the public, nonprofit, and private agencies will be required. The programs and services that exist and that are available to residents in the City of Traverse City are extensive and varied.

The City of Traverse City provides a wide range of housing and community development programs and services including data collection, planning, enforcement, financial management, legal knowledge of housing issues, and educational techniques as well as overall program development, administration, and implementation.

Local nonprofit organizations offer housing and community development activities, which can be partially funded by the local CDBG program offered by the City of Traverse City and/or Grand Traverse County. In the future, all eligible non-profits will be encouraged to apply for funds or serve as a subrecipient to avoid duplication of services, and offer their expertise where deemed appropriate.

ACTIONS PLANNED TO ENHANCE COORDINATION BETWEEN PUBLIC AND PRIVATE HOUSING AND SOCIAL SERVICE AGENCIES

The City of Traverse City will continue to coordinate with the local agencies to develop an effective institutional structure and enhance interagency coordination. The Traverse City Housing Commission administers housing vouchers in the city. Although funding for public housing authorities may be reduced, it is anticipated that local PHAs will still be awarded a significant amount of Federal funds to provide housing-related activities, such as rental assistance, rehabilitation, and new construction, for low-income persons.

The local nonprofit organizations in Traverse City provide several affordable housing and supportive services. These organizations typically have a specific target population that they serve, and accordingly possess a level of knowledge and expertise that is invaluable. The continuation and expansion of such services by aggressively seeking additional funding will be encouraged over the next year. In addition, better coordination between these agencies and with the public and private sector organizations will continue to be a high priority.

DISCUSSION

The City's actions planned to address obstacles to meeting underserved needs include activities in support of special needs assistance for victims of domestic violence, at-risk families and youth, the disabled, and the elderly. Additionally, the City's actions to foster and maintain affordable housing include continued funding of programs and agencies that further the affordable housing goals of the City.

Lead-based paint hazards will continue to be evaluated, environmental testing conducted, and educational materials made available to families at-risk of exposure. Institutional structure will continue to be developed through continued coordination with Grand Traverse County, Greater Grand Traverse Area Continuum of Care, MSHDA, local PHAs, and other State and local agencies. The City of Traverse City will continue to foster interagency coordination with the public service agencies in the community.

AP-90 Program Specific Requirements

INTRODUCTION

This section addresses the program-specific requirements for the Annual Action Plan.

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG) REFERENCE 24 CFR 91.220. (I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in **Table 52**. **Table 56** identifies any program income that is available for use that is included in projects to be carried out.

TABLE 56: AVAILABLE PROGRAM INCOME

Available Program Income	Amount
1. The total amount of program income that will have been received before	4-
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	\$0
identified in the grantee's strategic plan	
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	4-
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	<i>\$0</i>

Table 56 - Available Program Income

TABLE 57: OTHER CDBG REQUIREMENTS

Available Program Income	Amount
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 (for year 2024/2025).	
Overall Benefit - A consecutive period of one, two or three years may be used to determine	81%
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.	

Table 57 – Other CDBG Requirements

DISCUSSION

The City of Traverse City anticipates \$0 in program income to be available during the program year, as this is the first year that the City will receive this entitlement grant. As shown in **Table 57** the City has not identified funds for urgent need activities at this time; however, the percentage of overall benefit to low- and moderate-income persons is expected to be 81% (excluding program administration). The City of Traverse City has calculated the percentage of overall benefit based on the first program year (2024/2025), excluding program administration.



Purpose:

- To establish procedures for increasing citizen participation levels.
- Increase citizen participation in planning, prioritizing, and performance review of the
 Community Development Block Grant Program. Provide low/moderate income families,
 minority groups, and handicapped persons an opportunity to present comments, review
 proposals, and participate in the process of planning the expenditure of CDBG funds

Compliance:

Fulfill the requirements of the Community Development Regulations under Section 570.301 and 570.303 specifying adoption of a formalized Citizen Participation Plan; as amended by the September 1983 HUD Rules and Regulations; the 1987 Housing and Community Development Act Section 104(A)(3); the National Affordable Housing Act of 1990; and Part 91 Consolidated Submissions for Community Planning and Development (24 CFR Sec 91.105).

Procedure:

EFFECTIVE DATE

The effective date of this Citizen Participation Plan is August 12, 2024.

CITIZEN PARTICIPATION

A. Consolidated Plan and/or Annual Action Plan. There shall be two public hearings and a 30-day public comment period. The first public hearing shall be before the City Commission to hear project proposals and make project selection and funding recommendations. The second shall be before the City Commission to adopt, recommendations. There shall be a legal notice published before the public hearings. Before adoption of the Consolidated Plan, information will be made available to

citizens, public agencies, and other interested parties that includes the funding amount anticipated and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.

- B. Consolidated Plan Amendment. There shall be one public hearing before the City Commission and a 30-day public comment period. There shall be a legal notice published before the public hearing. A Consolidated Plan Amendment shall be required when there is the addition or the termination of an activity, change in location of an activity, or a change in the funding amount greater than 25%.
- C. Performance Report. There shall be one public hearing before the City Commission and a 15-day public comment period. All citizen comments and a summary of actions taken in response to the comments will be included in the performance report submitted to HUD. There shall be a legal notice published before the public hearing.
- D. Legal Notice. Public hearing and other notices shall be published in the official legal newspaper no later than 10 calendar days prior to the hearing date. Public hearing notices shall be published ten or more days before any public hearing. In addition, public hearing notices shall be posted on the City of Traverse City website.
- E. Public Hearings. Citizens will be encouraged to make comments on proposed CDBG projects and program amendments at the public hearings. The role of citizens at the public hearings is:
 - 1. To comment on proposals.
 - 2. To discuss concerns regarding CDBG projects.
 - 3. To suggest solutions for funding or solving CDBG problems.
 - 4. To interact with Staff in the implementation of plans and projects.
 - 5. To express funding and assistance priorities.

Public hearings shall be held on City facilities during or within three hours after regular business hours and in facilities accessible to persons with disabilities. Non-English-speaking residents will be provided with an interpreter if significant numbers of non-English speaking residents can be reasonably expected to participate. After the public hearings, Staff will review the citizen comments.

Comments that require written responses will answer within 15 working days of the public hearing. All citizen comments will be maintained on file and shall be part of the public record.

- F. Copies of Documents. Copies of public documents pertaining to the CDBG program will be available for public inspection in the Planning and Zoning Department. A 24-hour notice may be specified for some documents. In addition, copies of documents shall be made available on the City of Traverse City website.
- G. Publication. The proposed Consolidated Plan/Annual Action Plan shall be published and made available to citizens in the Planning and Zoning Department. A summary of the proposed plan shall be published in the legal newspaper. The summary shall describe the contents and purpose of the proposed plan and indicate where the entire plan document is available for examination. A reasonable number of free copies of the plan shall be provided to citizens and groups requesting it.
- H. Technical Assistance. Technical assistance will be provided on an as-needed basis at the planning and Zoning Department. Assistance will be provided to advise citizen organizations on the best method of presenting funding concepts to the City Commission; develop project proposals; assess problems that may occur; and provide information and referral.
- I. Complaints. Citizens may make complaints at any public hearing or prepare written complaints about the Consolidated Plan/Annual Action Plan, amendments, and performance report and submit them to the Planning and Zoning Department. Written complaints will be answered in writing within 15 working days of the receipt of the complaint; otherwise, an explanation will be provided within the time limit stating the reason for the delay and what date an answer will be provided.
- J. Displacement. The City of Traverse City shall minimize the displacement of persons in performance of the Consolidated Plan and shall assist any person displaced in accordance with Section 104(d) of the Housing and Community Development Act of 1974 and in consultation with HUD. This policy shall be stated in the annual published summary of the Consolidated Plan.

Appendix



- 1. Maps
- 2. Public participation
- 3.SF 424
- 4. Certifications

City of Traverse City Appendix

Maps



City of Traverse City

Appendix

Public Participation



City of Traverse City AppendixSF 424



City of Traverse City Appendix-

OMB Number: 4040-0007 Expiration Date: 02/28/2025

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE:

Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- 6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

- Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended. relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

- 13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- 16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE	
	City Manager	
9.vogel		
APPLICANT ORGANIZATION	DATE SUBMITTED	
City of Traverse City, MI	Q 13 W	

Standard Form 424B (Rev. 7-97) Back

OMB Number: 4040-0004 Expiration Date: 11/30/2025

Application for	Application for Federal Assistance SF-424					
* 1. Type of Submission Preapplication Application Changed/Corr		□ C			Revision, select appropriate letter(s): ther (Specify):	
* 3. Date Received: 08/13/2024						
5a. Federal Entity Identifier:				_ [5b. Federal Award Identifier:	
State Use Only:				, [.		
6. Date Received by	y State:		7. State Application	ı ide	nntifier:	
8. APPLICANT INF	ORMATION:					
* a. Legal Name:	City of Travers	se City	, MI			
* b. Employer/Taxpayer Identification Number (EIN/TIN): 38-6004740		ı Ir	* c. UEI: PNG1GBLYDGE6			
d. Address:						
* Street1: Street2: * City: County/Parish: * State: Province: * Country: * Zip / Postal Code:	Traverse City Grand Travers MI: Michigan USA: UNITED S	7se]
e. Organizational	Unit:			_		
Department Name: Planning, Zoning & Code Enforc				Division Name:		
f. Name and contact information of person to be contacted on matters involving this application: Prefix: Ms. *First Name: Leslie Middle Name: Sickterman Suffix: Title: Deputy Planning Director/Sustainability Coord Organizational Affiliation:						
* Telephone Number: 231-922-4411 Fax Number:						
*Email: lsickterman@traversecitymi.gov						

Application for Federal Assistance SF-424					
* 9. Type of Applicant 1: Select Applicant Type:					
C: City or Township Government					
Type of Applicant 2: Select Applicant Type:					
Type of Applicant 3: Select Applicant Type:					
* Other (specify):					
* 10. Name of Federal Agency:					
US Department of Housing and Urban Development (HUD)					
11. Catalog of Federal Domestic Assistance Number:					
14-218					
CFDA Title:					
Community Development Block Grant/Entitlement Grants - CDBG PY 2024					
* 12. Funding Opportunity Number:					
* Title:					
Community Development Block Grant/Entitlement Grants - CDBG PY 2024					
13. Competition Identification Number:					
Title:					
14. Areas Affected by Project (Cities, Counties, States, etc.):					
Add Attachment Delete Attachment View Attachment					
* 15. Descriptive Title of Applicant's Project:					
CDBG Entitlement 2024-2025 Annual Action Plan Activity Submission for the City of Traverse City,					
MI					
Attach supporting documents as specified in agency instructions.					
Add Attachments Delete Attachments View Attachments					

Application for Federal Assistance SF-424							
16. Congressional Districts Of:							
* a. Applicant 1 * b. Program/Project 1							
Attach an additional list of Program/Project Congressional Districts if needed.							
Add Attachment Delete Attachment View Attachment							
17. Proposed Project:							
* a. Start Date: 07/01/2024 * b. End Date: 06/30/2025							
18. Estimated Funding (\$):							
* a. Federal 365,323.00							
* b. Applicant							
* c. State							
* d. Local							
* e. Other							
*f. Program Income							
* g. TOTAL 365,323.00							
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?							
a. This application was made available to the State under the Executive Order 12372 Process for review on							
b. Program is subject to E.O. 12372 but has not been selected by the State for review.							
C. Program is not covered by E.O. 12372.							
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)							
Yes No							
If "Yes", provide explanation and attach							
Add Attachment Delete Attachment View Attachment							
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)							
AGREE							
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency							
specific instructions.							
Authorized Representative:							
Prefix: Ms. * First Name: Elizabeth							
Middle Name:							
*Last Name: Voge1							
Suffix:							
* Title: City Manager							
* Telephone Number: (231) 922-4440 Fax Number: (231) 922-4476							
* Email: evogel@traversecitymi.gov							
* Signature of Authorized Representative: 2.09 gel * Date Signed: \$13.24							

Certifications



City of Traverse City Appendix-

OMB Number: 4040-0009 Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
 of the United States and, if appropriate, the State,
 the right to examine all records, books, papers, or
 documents related to the assistance; and will establish
 a proper accounting system in accordance with
 generally accepted accounting standards or agency
 directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- 4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin, (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- 13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

- Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- 16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- 17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- 18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
9. Vogel,	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Traverse City, MI	8 13/24

SF-424D (Rev. 7-97) Back

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

Signature of Authorized Official

municipal

8 13/24 Date

Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

- 1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).
- 2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2024,2025,2026 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.
- 3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

- 1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
- 2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

9 13 24 Date

City manager

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.







