

DRAFT

May 16, 2025

2025/26 ANNUAL ACTION PLAN FOR CDBG PROGRAM

Submitted for Approval to U.S. Department of Housing & Urban Development



**CITY OF
TRAVERSE CITY**



Executive Summary

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

1. Introduction

The City of Traverse City has completed the planning process for the 2025/2026 Annual Plan as required by the U.S. Department of Housing and Urban Development (HUD). The purpose of the Annual Plan is to identify strategies and specific activities to realize the goals and objectives of the City's 2024/2025 - 2028/2029 Five-Year Plan. The Five-Year Plan is part of the City's Consolidated Plan adopted on August 13, 2024 addressing the City's housing and community development needs, including those of the homeless and other special needs populations. The full Consolidated Plan guides the use of city resources to address the needs over a five-year period. Program Year (PY) 2025/2026 will be the City's second annual allocation of approximately \$365,323 in Community Development Block Grant (CDBG) funds. [Note: as of the date of the preparation of this draft Annual Plan, HUD has not announced grant amounts for any grantee entitlement communities]

The Annual Plan was developed in a manner specified by HUD, and the City has followed the prescribed format in completing the Annual Plan. During the planning process, the City conducted public meetings with stakeholders and consulted with nonprofit groups. Information about the Annual Plan and an invitation to the general public to comment on potential activities under the Annual Plan was shared through the City's website and through its weekly newsletter, The Bay Brief, which has wide circulation and readership through the community. The purpose of this process was to receive citizen input on the current housing and community development needs of the City.

The City's Five-Year Plan established goals prioritized as follows:

1. **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:** Support shelters and services for persons experiencing homelessness or persons at-risk of homelessness.
3. **Non-Homeless Special Needs:** Support the needs of the community's aging population by improving the accessibility and housing, public facilities, and services for seniors and persons with disabilities.
4. **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.
5. **Program Administration**

2. **Summarize the objectives and outcomes identified in the Plan** *This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.*

The PY 2025/2026 Annual Plan was developed through consultation with City departments that focus on the activities addressed in the Five-Year Plan, service providers including area non-profits focusing on the needs of the homeless population and low- and moderate-income households, and other interested individuals and organizations.

The PY 2025/2026 Annual Plan has a focus on the following areas:

Goal One: Assist with the construction and rehabilitation of affordable housing and lower the economic barriers to such housing for low- and moderate-income households, seniors, and persons experiencing homelessness. Working with partners including non-profit affordable housing developers (such as HomeStretch Nonprofit Housing Corporation), public housing organizations (the Traverse City Housing Commission), non-profits including local continuum of care organizations (including the Coalition to End Homelessness).

Goal One Objectives

1. To bridge funding gaps to construct 44 affordable and supportive housing units for low- and moderate-income households; and
2. To provide tenant-based rental assistance to 45 households with immediate need.

Goal One Justification

1. Community partners have identified possible gaps in funding to bring planned affordable housing on-line;

2. Using CDBG funding to support construction of planned new housing affordable to low- and moderate-income households will allow the City to leverage its CDBG allocation against other grants, loans, and other incentive programs; and
3. Traverse City's Needs Assessment has identified cost burden (housing cost higher than 30% of income) as the most common housing problem, especially for renters. Up to 560 (17.5%) rental households in the City had a severe cost burden (housing cost higher than 50% of income).

Goal Two: Support community and economic development projects, including public facility or infrastructure improvements in qualifying low- and moderate-income areas. Collaborate with City Parks and Recreation and Engineering departments to identify high priority infrastructure needs in qualifying low- and moderate-income areas.

Goal Two Objectives: To help address infrastructure needs that will enhance living conditions and improve pedestrian circulation contributing to the City's economic development and ability for its population to age in place.

Goal Two Justification

1. Activities that support public infrastructure that promote aging in place, economic development, and public infrastructure improvements addresses two of the five goals of the Five-Year Plan;
2. Funding gaps for qualifying public infrastructure projects meeting Five Year Plan goals have been identified by City staff;
3. Identified projects supporting this goal have a potential for leveraging other funding sources to more effectively use federal dollars.

Goal Three: Support shelters and services for persons experiencing homelessness or persons at-risk of homelessness through capacity building and staffing assistance.

Goal Three Justification: Area shelters have had to expand services as homelessness becomes a growing issue in the community. Until more affordable units and units with wrap-around services are brought on line, shelters require additional support a variety of sources within the community.

Goal Four: Support program administration.

Goal Four Justification

1. The City can best meet fair housing objectives through third party consultation;
2. The City will utilize as-needed administrative consultation;
3. The City may be required to consult with authorized consultants for necessary environmental review.

3. **Evaluation of past performance** *This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.*

The City is currently completing its first year as a CDBG entitlement community. The primary focus for first year spending under the program was to support homeless shelters and to rehabilitate existing permanent supportive housing. Some lessons learned from the first year include the following:

1. Fewer, larger projects are a more efficient use of administrative capacity during early program development;
2. Further coordination and pre-planning with partner service agencies will be necessary to develop programs for activities such as home rehabilitation and weatherization;
3. Timeliness of development projects are important to the long-term planning for CDBG programming;
4. Seeking collaborations and leveraging of funding sources is an impactful use of CDBG funding.

4. **Summary of Citizen Participation Process and consultation process** *Summary from citizen participation section of plan.*

For development of the PY 2025/2026 Annual Plan, the City followed the process called for under the Citizen Participation Plan (beginning on page 141 of the 2024-2028 Five Year Consolidated Plan). Required citizen participation includes two public hearings held by the City Commission and a 30-day public comment period. As noted in the Citizen Participation Plan, 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 were held on April 7th, 2025 and May 12th, 2025 at 7:00 p.m. during regular City Commission meetings held at 400 Boardman Avenue in the Commission chambers. The 30-day comment period ran between these dates. During the comment period, the draft Annual Plan was available for review on the City's webpage and a hard copy was available in the City's Planning Department.

5. **Summary of public comments** *This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.*

No comments were received during the hearings or during the public comment period.

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

No public comments were received during the hearings or during the public comment period. This does not apply.

7. **Summary**

In summary, the City of Traverse City worked with partner organizations and within its departments to identify activities for the 2025/2026 CDBG Program Year that will best meet the goals of the City's current Five Year Comprehensive Plan. The goals of this plan are as follows:

Goal One: Support construction of 44 supportive housing benefitting low- and moderate-income households. Lower cost of housing to support low and moderate income households through rental assistance for up to 45 households.

Goal Two: Support the development of public infrastructure within qualifying low- and moderate-income neighborhoods to promote economic development, aging in place, and quality of life for residents.

Goal Three: Support shelters and services benefitting the homeless population and those at risk of homelessness.

Goal Four: Support program administration.

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
CDBG Administrator	TRAVERSE CITY	Planning and Zoning Department

Table 1 – Responsible Agencies

Narrative (optional)

At this time, primary responsibility for the administration of the CDBG program for the City of Traverse City resides with the City's Planning and Zoning Department under the direction of the City Manager's office.

Consolidated Plan Public Contact Information

City of Traverse City
Planning and Zoning Department
Leslie Sickterman, Deputy Planning Director
400 Boardman Avenue
Traverse City MI 49684
lsickterman@traversecitymi.gov
231.922-4411

1. Introduction

The City of Traverse City has consulted with the local continuum of care in the development of the 2025/2026 Program Year Action Plan. The City has been actively involved in coordination with local agencies to increase the availability of housing for low- and moderate-income households and to support the population experiencing homelessness. Following is a summary of these efforts and the on-going work of community partners to address community needs.

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

In 2023, the City initiated discussions with local stakeholders to seek solutions to the increasing homeless crisis within the City. The City actively enlisted the support of service providers including the Northwest Michigan Coalition to End Homelessness (NWCEH) as part of this effort. The City is represented on the Homelessness Collective, an organization assembled in 2024 by Rotary Charities and the Grand Traverse Regional Community Foundation to focus on creating a new framework to developing solutions to homelessness in the City. These discussions have also included those with lived experience of homelessness and neighborhood representatives.

In December 2024, the City adopted a resolution supporting the Northwest Michigan Coalition to End Homelessness’ effort to “end chronic homelessness through permanent supportive housing”. The City has convened stakeholder discussions with a range of service providers, non-profit developers, and others to review possible CDBG spending in support of this effort. The City has created a social worker position through the City Police Department whose primary focus is to engage with individuals in crisis to help connect this population to services provided by the NWCEH and other partner organizations, including housing, substance abuse, and other wraparound services. This is part of the Police Department’s community policing Quick Response Team (QRT). The City has approved a second police social worker for its 2024-25 budget year.

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

The Northwest Michigan Coalition to End Homelessness (NWCEH) is the Greater Grand Traverse Area Continuum of Care. The City has worked with NWCEH and other partners to secure a permanent

location for a year-round emergency shelter. It was determined that the most inclusive and sustainable approach would be to support the operation of a year-round emergency shelter at Safe Harbor, an existing seasonal shelter with a 90-bed capacity. As a result, the City committed \$100,000 of its first year's CDBG funding to support capital improvements at the facility. Safe Harbor's staff is now securing official approval of all necessary permits to operate on a year-round basis.

In consultant with the NWCEH, the City's has identified short-, mid-, and long-term goals to address homelessness. Short term emergency response to the increasing population of the Pines (a homeless encampment in Traverse City) has included improving sanitation and charging facilities at the encampment, tree trimming, installation of security cameras and additional waste receptacles. These improvements have been made by the City with funding assistance by the Community Foundation.

Mid-term goals include expanding community police officers, an additional embedded social worker, and developing a community court to address legal issues of those experiencing homelessness. The City has expanded staffing as called for under these goals and has begun discussions with Grand Traverse County surrounding the community court goals.

Long-term goals are to support funding gaps to house 17 chronically homeless individuals by August of 2024 and an additional 10 by January 2025 at East Bay Flats, to support more permanent supportive housing and to continue to support PILOTs (tax abatements) for permanent supportive housing projects, to work and communicate progress with community partners, to support more permanent supportive housing opportunities, and finally to work toward decreasing unsheltered homelessness. The City has contributed to meeting these goals by providing \$360,000 to fill a funding gap for East Bay Flats to help house 27 homeless individuals; approving a PILOT for Annika II's permanent supportive housing development; allocating CDBG funding to both East Bay Flats and for Northwest Michigan Supportive Housing to support permanent supportive housing in the City; committing \$120,000 in ARPA funds for to support day shelters; and allocating CDBG funding for both day and overnight shelters.

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

Northwest Michigan Coalition to End Homeless is the Greater Grand Traverse Area Continuum of Care. NWCEH's mission is to make homelessness rare, brief, and one-time throughout Northwest Michigan. The NWCEH coordinates the community's policies, strategies and activities toward ending homelessness. Its work includes gathering and analyzing information to determine the local needs of people experiencing homelessness, implementing strategic response, educating the community on the complex public health issue of homelessness, providing technical assistance on the operations of the homeless response system, and measuring CoC performance. The NWCEH Executive Committee and

Steering Committee approves the local process for applying, reviewing, and prioritizing projection applications for funding in the annual MSHDA ESG.

The HMIS Lead Agency for the NWCEH is Goodwill Northern Michigan. As the lead agency, Goodwill administers the contract for the HMIS System Administrator.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Grand Traverse County
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation, consultation through published documents
2	Agency/Group/Organization	NORTHWEST MICHIGAN COMMUNITY ACTION AGENCY
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation, consultation through published documents
3	Agency/Group/Organization	Grace Episcopal Church Day Shelter - Jubilee House
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation
4	Agency/Group/Organization	Goodwill of Northern Michigan
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation, consultation through published documents
5	Agency/Group/Organization	Northwest Michigan Supportive Housing (NMSH)
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation
6	Agency/Group/Organization	Traverse City Police Department
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation, consultation through published documents
7	Agency/Group/Organization	TRAVERSE CITY HC
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation
8	Agency/Group/Organization	TRAVERSE CITY
	Agency/Group/Organization Type	Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation, consultation through published documents
9	Agency/Group/Organization	HOMESTRETCH
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation, consultation through published documents
10	Agency/Group/Organization	Safe Harbor of Grand Traverse
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation
11	Agency/Group/Organization	Fair Housing Center of West Michigan
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation
12	Agency/Group/Organization	Housing North
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meeting, in-person consultation, consultation through published documents
13	Agency/Group/Organization	Northwest Michigan Coalition to End Homelessness /Greater Grand Traverse Area Continuum of Care
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended stakeholder meeting, in-person consultation, consultation through published documents

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 of the Traverse Area Community Public Schools Student Support Services and Community Mental Health who chose not to attend the stakeholder meeting.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Greater Grand Traverse Area Continuum of Care	Identification of Need, Goals related to homelessness
City of Traverse City Master Plan	City of Traverse City	Identification of public needs
Various Department Reports	City of Traverse City Government Departments	Identification of goals related to homelessness and community development and park planning

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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

Consistent with the City's Citizen Participation Plan effective August 12, 2024 and developed under Section 570.301 and 570.303 of HUD's Community Development Regulations, the City held two public hearings. The public hearings were held by the City Commission on April 7, 2025 and May 12, 2025. Each public hearing was noticed in the local newspaper of record, the Record Eagle, a minimum of 10 days prior to each hearing. In addition, the notices were posted on the City's webpage and within the building. Copies of the proposed Annual Plan were made available prior to each hearing at the City's website and a hard copy in the City's Planning and Zoning Department. The hearings and details of the annual proposed plan were also featured in the Bay Brief, a city weekly newsletter widely disseminated via email to subscribers. Interested parties were encouraged through these means to comment on and propose funding activities to be considered. In addition, the City held a focus group meeting with stakeholders to discuss the program and potential activities for the 2025/26 program year. Staff consulted with additional service providers and stakeholders in one-on-one discussions during the development of the draft annual plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of Comments received	Summary of comments not accepted and reasons
1	Stakeholder Focus Group	Non-targeted/ broad community	March 5, 2025; 15 attendees	Possible projects for funding discussed included large-scale low/mod housing developments; rental subsidies for low/mod individuals; housing rehabilitation and weatherization to help seniors age in place and to assist other low/mod households; permanent supportive housing projects assisting those leaving homelessness or incarceration; public parks; day shelters; fair housing services and other program administration costs.	Rental subsidies to be used outside of jurisdiction and renovations of a day shelter that may be relocated were not included due to concern of compliance with HUD regulations; county-owned park improvements not included because of location outside of low/mod area

2	Public Hearing	Non-targeted/b road community	April 7, 2025; approximately 25 attendees. No comments received.	None	NA
3	Public Hearing	Non-targeted/b road community	May 12, 2025	TBD	TBD
4	30-Day Comment Period	Non-targeted/b road community	No comments received.	None	NA

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The Annual 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.

The City of Traverse City anticipates a total allocation of \$365,323 in CDBG funding for the 2025/2026 program year. Program income may be realized over the course of the 2025/2026 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 2025/2026 Annual Action Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	365,323.00	0.00	0.00	365,323.00	1,095,969.00	Additional resources for leveraging may include other State and Federal grant sources, City Departments, public or social service providers or other sources of funding.

Table 5 - Expected Resources – Priority Table

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.

Specifically, Low Income Housing Tax Credits (LIHTC) through the Michigan State Housing Development Authority (MSHDA), Federal Home Loan Bank of Indianapolis Affordable Housing Program (FHLBI AHP), Traverse City's Tax Abatement Program (PILOT), and the City's Brown Bridge Trust Fund have been considered as funding sources that may be used to leverage CDBG funding.

If appropriate, describe publically 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. City-owned parks located within a recognized low- moderate-income area, such as Jupiter Gardens, are being considered for partial funding with CDBG dollars. 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 and managed 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.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing	2024	2028	Affordable Housing	Citywide	Rental Assistance Accessible and Affordable Housing	CDBG: \$270,323.00	Rental units constructed: 44 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 45 Households Assisted
2	Community and Economic Development	2024	2028	Non-Housing Community Development	Citywide	Public Facilities and Infrastructure Aging in Place	CDBG: \$20,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted
3	Homelessness	2024	2028	Homeless	Citywide	Homeless Services and Prevention	CDBG: \$50,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 90 Persons Assisted
4	Program Administration	2024	2028	Program Administration	Citywide	Program Administration	CDBG: \$25,000.00	Other: 0 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing
	Goal Description	Assist with the construction of affordable housing, and lower economic barriers to such housing, for low- and moderate-income households, seniors, and person experiencing homelessness.
2	Goal Name	Community and Economic Development
	Goal Description	Assist with enhancement to City park facilities that serve a low- and moderate-income areas; such facilities to be accessible to the aging populations, especially those with mobility or other restrictions.
3	Goal Name	Homelessness
	Goal Description	Support shelters assisting the homeless population and those at risk of homelessness.
4	Goal Name	Program Administration
	Goal Description	Program administration

Projects

AP-35 Projects – 91.220(d)

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 staffing for to assist persons experiencing homelessness.

The City of Traverse City’s planned actions for the 2024/2025 Annual Action Plan are summarized in **Table 6** and **Table 7**.

Projects

#	Project Name
1	Affordable Housing Assistance and Development
2	Public Facilities and Infrastructure Improvements
3	Homeless Shelter Support
4	Program Administration

Table 7 - Project Information

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

The one-year allocation priorities are focused on four goals of the Strategic Plan: Housing, Community
Annual Action Plan
2025

and Economic Development' 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:	\$270,323 (74%)
Homeless Needs:	\$50,000 (13.7%)
Non-Homeless Special Needs:	\$0 (0%)
Community and Economic Development:	\$20,000 (5.5%)
Program Administration:	\$25,000 (6.8%)

**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 second 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

1	Project Name	Affordable Housing Assistance and Development
	Target Area	
	Goals Supported	Housing
	Needs Addressed	Rental Assistance Accessible and Affordable Housing
	Funding	CDBG: \$270,323.00
	Description	Assist with the development of new affordable housing projects, supportive housing projects, and tenant-based rental assistance all benefitting low and moderate income households. Through partner collaborations with organizations including HomeStretch, Goodwill, and others.
	Target Date	11/30/2028
	Estimate the number and type of families that will benefit from the proposed activities	89 low and moderate income families/households are expected to benefit from the activities associated with this project.
	Location Description	New affordable housing project located at Front and Cass Streets in Traverse City and emergency rental assistance in locations throughout the City
	Planned Activities	Assist with the construction of a new, 44 unit supportive housing development in conjunction with HomeStretch nonprofit housing developer and assisting with emergency rapid rehousing of up to 45 families at risk of homelessness on an as-needed basis with the assistance of Goodwill.
2	Project Name	Public Facilities and Infrastructure Improvements
	Target Area	

	Goals Supported	Community and Economic Development
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$20,000.00
	Description	Funding for public facilities and infrastructure improvements within low- and moderate-income areas within the City of Traverse City. For example, park improvements, street infrastructure, or sidewalk improvements.
	Target Date	11/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	200 low and moderate income families that reside within low and moderate income areas of the City
	Location Description	Projects may include City-owned Jupiter Gardens Park, located at 912 Boyd Avenue or other projects located within low and moderate income areas of the City.
	Planned Activities	Parks, recreational facilities 03F, street improvements 03K, flood drainage improvements 03I
3	Project Name	Homeless Shelter Support
	Target Area	
	Goals Supported	Homelessness
	Needs Addressed	Homeless Services and Prevention
	Funding	CDBG: \$50,000.00
	Description	Support homeless shelters, including day shelters or overnight shelters, including public services at facilities throughout the city, including Jubilee House, Central United Methodist Church, Safe Harbor, or other facilities serving the homeless population within the City.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that 90 individuals will benefit.

4	Location Description	Shelters in the City including those in the vicinity of Cass and State Street, State and Boardman Streets, and Wellington Street.
	Planned Activities	Staffing assistance.
	Project Name	Program Administration
	Target Area	
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	CDBG: \$25,000.00
	Description	Assistance with the administration of the City's CDBG program to meet all HUD requirements
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	NA
	Location Description	NA
	Planned Activities	Consultation to assist with the completion of annual plan, CAPER, environmental reviews, and overall program administration.



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

For the 2025/2026 Annual Action Plan, the City of Traverse City will direct assistance to low- and moderate-income areas citywide (See **Table 8**). Assistance will also be made available City-wide to persons meeting the CDBG eligibility requirements for low- and moderate-income benefit.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 8 - 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 projects to implement goals of the Strategic Plan during the second year of the 2024/2028 Consolidated Plan. These projects benefit low- and moderate-income persons Citywide, based on income eligibility, and persons experiencing or at-risk of homelessness.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

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 **Tables 9** and are inclusive of the affordable housing activities in addition to other planned housing activities identified in the **Project Summary, AP-38. Table 10** 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.]

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	89
Special-Needs	0
Total	89

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	45
The Production of New Units	44
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	89

Table 10 - One Year Goals for Affordable Housing by Support Type

Annual Action Plan
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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 44 new rental units in one proposed development and providing rental assistance to multiple households during the 2025/2026 program year. These activities will benefit an estimated 89 households in total.

AP-60 Public Housing – 91.220(h)

Introduction

This section of the Annual Action Plan describes what actions of the City of Traverse City will take in the 2025/2026 program year to carry out the public housing portion of the Strategic Plan. Below, the City has identified how the 2025/2026 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.

The TCHC is working toward bringing more public housing units on line in locations throughout the City. These projects are in varying states of completion. Those activities under construction or nearing construction are fully funded; however, if any financing gaps emerge, the City may dedicate CDBG funding to bridge funding gaps.

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.

Discussion

No further discussion.

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

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 including

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

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.

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 2025/2026 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. The City has been actively working with partners in the region to identify and act on short-, mid-, and long-term solutions to the City's growing unhoused population.

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

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 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 and commit funding when possible.

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. The City is in the process of considering zoning changes allowing for increased densities in one of its residential zoning districts. Recent past zoning changes have already had an impact on allowing property owners to build accessory dwelling units and second units in most locations throughout the residential zoning districts. The City is also entering PILOT taxing arrangements with developers of low- and moderate-income housing projects.

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.

AP-85 Other Actions – 91.220(k)

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.

Program Specific Requirements

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

Introduction:

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

Projects planned with all CDBG funds expected to be available during the year are identified in **Table 6**. The table below identifies any program income that is available for use that is included in projects to be carried out.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

- | | |
|---|--------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 93.00% |