



BAY CITY HOUSING COMMISSION

**RESIDENT ADVISORY COUNCIL AND PUBLIC INPUT MEETING FOR
THE FYB2024-FYB2028 FIVE-YEAR PHA PLAN
FOR THE BAY CITY HOUSING COMMISSION**

**Thursday, May 15, 2025 at 5:00 PM
315 14th Street Bay City, MI 48708**

This purpose of this meeting is to engage with members of the public and residents in the Public Housing Scattered Site Family Housing Program. The Housing Commission will present its FYB2024-FYB2028 Five-Year PHA Plan.

The FYB2024-FYB2028 Five-Year PHA Plan is available for viewing at:
www.baycityhousing.com.

For anyone needing a hard copy of the FYB2024-FYB2028 Five-Year PHA Plan, please call Denise at (989) 892-9581 x102 to request a copy for mailing or pick up at our main office.

DRAFT PLAN
FOR COMMENT ONLY

**BAY CITY HOUSING COMMISSION (MI024)
FYB2024 - FYB2028 FIVE-YEAR PHA PLAN**



BAY CITY HOUSING COMMISSION
315 14TH STREET
BAY CITY, MICHIGAN 48708
TELEPHONE: (989) 892-9581
FACIMILE: (989)892-5815

<h1>5-Year PHA Plan</h1> <h2>(for All PHAs)</h2>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 09/30/2027
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Applicability. The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.														
A.1	<p>PHA Name: Bay City Housing Commission PHA Code: MI024 PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2024 The Five-Year Period of the Plan (i.e., 2019-2023): 2024-2028 Plan Submission Type <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>How the public can access this PHA Plan: The PHA Plan may be found at: www.baycityhousing.com or by calling the main office or any property at: (989) 892-9581.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)</p> <table border="1" data-bbox="162 1081 1526 1144"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV						
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		PH	HCV												
B.	Plan Elements. Required for all PHAs completing this form.														
B.1	<p>Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.</p> <p>Is to enhance the quality of life in our community through the provision and improvement of decent, safe, affordable housing programs that meet the needs of our citizens.</p>														
B.2	<p>Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low-income, and extremely low-income families for the next five years.</p> <p>GOAL #1: OPTIMIZE PERFORMANCE STRATEGIC OBJECTIVE: TO MAINTAIN THE HIGHEST POSSIBLE STANDARD OF QUALITY IN THE PHA'S HOUSING INVENTORY WITH A PHYSICAL OCCUPANCY AT 99% OR BETTER, WITH COMBINED PHYSICAL AND LEASED OCCUPANCY LEVELS EXCEEDING 102%. GOAL #2: ASSURE FAIR HOUSING POLICIES PROGRAMS AND PRACTICES STRATEGIC OBJECTIVE: ASSURE THAT THE POLICIES, PROGRAMS, AND PRACTICES OF THE BAY CITY HOUSING COMMISSION ELIMINATE SYSTEMIC BARRIERS TO ACCESS ITS AFFORDABLE HOUSING BY ANY PROTECTED CLASS OF INDIVIDUAL OR FAMILY. FACTORS THAT OFTEN CONTRIBUTE TO FAIR HOUSING IMBALANCE ARE SEGREGATION, RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY, DISPARITIES IN ACCESS TO OPPORTUNITY, DISPROPORTIONATE HOUSING NEEDS, AND FAIR HOUSING ISSUES RELATED TO PUBLICLY SUPPORTED HOUSING, DISABILITY AND ACCESS, AND FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, AND RESOURCES. GOAL #3: ADDRESS COMMUNITY HOUSING NEEDS STRATEGIC OBJECTIVE: WHENEVER FEASIBLE, UNDERTAKE EFFORTS TO DEVELOP ADDITIONAL AFFORDABLE HOUSING INVENTORY IN THE PRIMARY MARKET OF BAY CITY, MI. THAT MEETS THE IDENTIFIED NEED. FAIR AND EQUITABLE ACCESS TO HOUSING AFFORDABLE TO ALL FAMILIES IS A FAIR HOUSING FUNCTION. BALANCING NEED AGAINST THE COMMUNITY'S INVENTORY OF SAFE AND AFFORDABLE HOUSING IS NECESSARY TO AVOID PREDATORY TREATMENT AND SYSTEMIC BARRIERS TO A FAMILY'S ACCESS TO HOUSING THEY CAN AFFORD.</p>														
B.3	<p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p>Goal#1: The strategic objectives have been exceeded for each of the prior five years. Goal #2: In FY2024, The Application, Admissions and Continued Occupancy Plan (ACOP), or, in the case of our multifamily portfolio, the Tenant Selection Plan (TSP), were all updated to incorporate the changes</p>														

	<p>resulting from the Housing Opportunity Through Modernization Act (HOTMA). The Bay City Housing Commission has a history of administering its programs with little or no issues. The PHA has been diligent with its Fair Housing training support for all staff, assuring a high degree of sensitivity to the issues that contribute to inequity. Goal #3: The Bay City Housing Commission has acquired sites that intend to develop new multifamily apartments that will replace part of its current public housing inventory. The units removed from the public housing portfolio will then be rehabilitated and re-leased as affordable housing. This strategy will add to the total inventory operated by The Bay City Housing Commission. Additionally, the PHA is proposing to the City of Bay City that it develop new affordable housing units with funds from the HOME and/or HOME-ARP Programs. Additionally, the PHA continues to progress in its development plan for 112 units of affordable housing on the Columbus Avenue sites it owns under the RAD program. Grants have been awarded for the environmental remediation and demolition of blighted buildings on site. Predevelopment activities are ongoing with targeted construction for January 2027.</p>	
<p>B.4</p>	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>The Bay City Housing Commission (BCHC) maintains a policy addressing the issues cited by originally passed by Congress as Title IV of the Violent Crime Control and Law Enforcement Act of 1994 (P.L. 103-322). BCHC's goal for this program is to accommodate unit transfers or lease terminations for eligible victims confidentially and expeditiously, whenever possible.</p>	
<p>C.</p>	<p>Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>A significant amendment or modification is defined as a change in policy that significantly and materially alters the PHA's stated mission, goals, objectives, and activities. This includes changes to admissions preferences, demolition/disposition activities, and conversion programs.</p>	
<p>C.2</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan? Y <input type="checkbox"/> N <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations</p>	
<p>C.3</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>	
<p>C.4</p>	<p>Required Submission for HUD FO Review.</p> <p>(a) Did the public challenge any elements of the Plan? Y <input type="checkbox"/> N <input type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>	
<p>D.</p>	<p>Affirmatively Furthering Fair Housing (AFFH).</p>	
<p>D.1</p>	<p>Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="162 1638 1542 1995"> <tr> <td> <p>Fair Housing Goal: Strategic Goal #1: Optimize PHA Performance: Maintain the highest possible standard of quality in the PHA's Housing Inventory with a Physical Occupancy at 99% or better.</p> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>The Bay City Housing Commission's first priority is to be introspective and pragmatic about the effectiveness of its own programs. Maintaining fair access to good, safe housing for all its applicants and managing fair and equitable programming throughout its operations for its tenants is always the top priority and strategy for demonstrating commitment to AFFH practices in the community.</p> <p>Fair Housing Goal: Strategic Goal #2: Educate PHA Staff and Support Community Engagement and Education Around AFFH Issues.</p> </td> </tr> </table>	<p>Fair Housing Goal: Strategic Goal #1: Optimize PHA Performance: Maintain the highest possible standard of quality in the PHA's Housing Inventory with a Physical Occupancy at 99% or better.</p> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>The Bay City Housing Commission's first priority is to be introspective and pragmatic about the effectiveness of its own programs. Maintaining fair access to good, safe housing for all its applicants and managing fair and equitable programming throughout its operations for its tenants is always the top priority and strategy for demonstrating commitment to AFFH practices in the community.</p> <p>Fair Housing Goal: Strategic Goal #2: Educate PHA Staff and Support Community Engagement and Education Around AFFH Issues.</p>
<p>Fair Housing Goal: Strategic Goal #1: Optimize PHA Performance: Maintain the highest possible standard of quality in the PHA's Housing Inventory with a Physical Occupancy at 99% or better.</p> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>The Bay City Housing Commission's first priority is to be introspective and pragmatic about the effectiveness of its own programs. Maintaining fair access to good, safe housing for all its applicants and managing fair and equitable programming throughout its operations for its tenants is always the top priority and strategy for demonstrating commitment to AFFH practices in the community.</p> <p>Fair Housing Goal: Strategic Goal #2: Educate PHA Staff and Support Community Engagement and Education Around AFFH Issues.</p>		

Describe fair housing strategies and actions to achieve the goal

The PHA provides regular fair housing training for its staff. Additionally, the PHA participates in Fair Housing symposiums and presentations of Consolidated Plans with the City of Bay City with Legal Services of Eastern Michigan, including holding public meetings annually with its public housing scattered site tenants to discuss issues and receive suggestions from the community.

Fair Housing Goal: Strategic Goal # 3: Assess Fair Housing Issues: Identify and Prioritize Contributing Factors**Describe fair housing strategies and actions to achieve the goal**

Awareness of contributing factors in the PHA's service areas (Bay City, MI.) serves to elevate the standards for the entire community, ensuring each household needing safe and affordable housing has equal access. The PHA's shall partner with the City of Bay City whenever possible to survey and identify factors contributing to a lack of fair housing in the market.

Fair Housing Goal: Strategic Goal #4: Set Fair Housing Goals and Priorities:**Describe fair housing strategies and actions to achieve the goal**

The PHA's Core Organizational Goals stated in its PHA Plans have been synergistically designed to provide an effective path forward for the organization. The core objectives affirm reflect the need to have Fair Housing practices in the forefront: a. PHA Goal #1: Optimize Performance b. PHA Goal #2: Assure Fair Housing Policies, Programs and Practices c. PHA Goal #3: Address Community Housing Needs

Form identification: MI024-Bay City Housing Commission form HUD-50075-5Y (Form ID - 2657) printed by William Phillips in HUD Secure Systems/Public Housing Portal at 03/23/2025 11:04AM EST

A.1. PHA INFORMATION

The Bay City Housing Commission is a public housing agency (PHA) created by the City of Bay City, pursuant to Michigan Public Act 18. It serves as a conduit for funding and programs originating from the **U. S. Department of Housing and Urban Development (HUD)**.

Today, the Bay City Housing Commission operates three housing programs, two programs provide project based rental assistance for tenants that pay 30% of their income as their rental payment and one program is unrestricted. The Five-year PHA Plan addresses the Public Housing Program only. However, ***to understand the full scope of operations, the reader should be aware of the total programmatic structure.***

1. **Public Housing Program** comprised of 193 single family houses and 2-unit buildings in a scattered site configuration located throughout Bay City neighborhoods. This portfolio received annual operating grants and capital funding grants for the public housing directly from HUD which, in turn, receives annual appropriations from the United States Congress.

The conversion of the Public Housing units under the Rental Assistance Demonstration Program (RAD) is continuing. Land has been acquired and development plans for the first phase have received local entitlement approvals. The project was paused during the pandemic to allow time for construction costs to stabilize. Plans to fund demolition and abatement of site conditions are underway. Depending on the timing of completion of demolition of existing site structures and abatement, activity on the development plan for a 56-unit multifamily development will resume.

2. **Multifamily Program** comprised of four high-rise buildings with a combined total of 527 units. Two buildings are designated for the elderly and two for families. Each property has a stated preference for persons with disabilities. Within the multifamily program there are two subsets of properties characterized by the financial structure. Multifamily properties have entered into Housing Assistance Payment Contracts (HAP) with HUD to provide monthly contract rent to supplement the tenant paid portion of the total rent each month.
 - a. Maplewood Manor was substantially rehabilitated in 2016 using **Low Income Housing Tax Credits (LIHTC)** through the Michigan State Housing Development Authority (MSHDA). It is owned by investors that purchased the LIHTCs to generate the funds for rehabilitation. The property is managed by the Bay City Housing Commission by virtue of Management and Operating Agreements with the investors. When LIHTCs are purchased by the investors, the investors have

the ability to select the asset and property management firm that operates the property.

- b. Smith Manor, Pine Towers and Maloney Manor are currently owned exclusively by the Bay City Housing Commission following the repositioning/restructuring pursuant to the **Rental Assistance Demonstration Program (RAD)**. However, it is likely these properties will be restructured using LIHTCs or another financing facility within the coming five to seven years.
3. **Conventional Portfolio** – This portfolio consists of six units (one 4-plex and 2 SFR). These units have no program restrictions, except the 4-plex building is master-leased to a community nonprofit organization that, in turn, provides housing to transitional low-income individuals. The two single family houses are typically leased to Section 8 voucher holders through BECKA Management Group. BECKA Management Group is a housing agent through the Michigan State Housing Development Authority (MSHDA).
4. **Housing Choice Vouchers (HCV)** – The Bay City Housing Commission does not administer an HCV program.

Despite the preponderance of federal and state agencies, investor, and regulatory agencies with jurisdiction over the operations of the PHA, the Bay City Housing Commission is the organization tasked to represent the interest of citizens within its housing area and to support the City of Bay City's community development efforts. The mission and vision of the Bay City Housing Commission reflects the dedication its Board and staff have for serving the community. This Five-year PHA Plan follows the reporting framework provided in the HUD Form 50075-SM.

HOUSING NEEDS (Section 10.0 of the PHA Annual Plan)

On March 2, 2020, Shaw Research and Consulting, LLC completed a Rental Housing Market Feasibility Analysis of Bay City Michigan for the Bay City Housing Commission. A prior report had also been published in 2018. The conclusion from both reports calculated an increasing demand for affordable housing with approximately half the projected demand being for subsidized housing. The total projected demand in 2020 was 1,129 units. Notwithstanding that the Shaw Research and Consulting Report is now three years old, the conclusions continue to be relevant, if not under-estimated.

As of March 17, 2025, the portfolio of public housing units in Bay City averages a 98.4+% physical occupancy with the entire portfolio averaging 99.2% physical occupancy. Currently there is a total of 602 applicants on the combined wait lists. There are 298 applications on the wait list for public housing with another 299 on wait list for the Multifamily Program.

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, _____, the _____
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal
year _____ of the _____ is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Bay City, Michigan

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official:	Title:
Signature:	Date:

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

<p>Civil Rights Certification (Qualified PHAs)</p>	<p>U.S. Department of Housing and Urban Development</p> <p>Office of Public and Indian Housing OMB Approval No. 2577-0226 Expires 09/30/2027</p>
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**Civil Rights Certification
Annual Certification and Board Resolution**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan , hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning 10/2025 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintains records reflecting these analyses and actions.

Bay City Housing Commission

MI024

PHA Name

PHA Number/PHA Code

I hereby certify that all the statement above, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Executive Director: **MR William Phillips**

Name of Board Chairperson: **Sharon Brown**

Signature: Date:

Signature: Date:

Executive Director Signature:

Board Chairperson Signature:

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Form identification: MI024-Bay City Housing Commission form HUD-50077-CR (Form ID - 2883) for CY 2025 printed by William Phillips in HUD Secure Systems/Public Housing Portal at 03/23/2025 11:15AM EST

BAY CITY HOUSING COMMISSION (MI024)
FYB2024 ANNUAL PHA PLAN
MARCH 24, 2025

C.4. Challenged Elements.



BAY CITY HOUSING COMMISSION

**Assessing Strategies and Plans
For Affirmatively Furthering Fair Housing
March 20, 2025**

D.1 Affirmatively Furthering Fair Housing (AFFH). Statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5).

Strategic Goal #1: Optimize PHA Performance: Maintain the highest possible standard of quality in the PHA's Housing Inventory with a Physical Occupancy at 99% or better.

"Physician, heal thyself"¹ may be the most appropriate historical reference to apply to the issues of Fair Housing. The **Bay City Housing Commission's first priority** is to be introspective and pragmatic about the effectiveness of its own programs. Maintaining fair access to good, safe housing for all its applicants and managing fair and equitable programming throughout its operations for its tenants is always the top priority and strategy for demonstrating commitment to AFFH practices in the community.

Currently, the Bay City Housing Commission (PHA) has not identified any barriers to any segment of the population to access its portfolio of public and affordable housing. The PHA does maintain owner preferences and suitability requirements that are consistent with HUD guidelines for such criteria. Furthermore, the PHA monitors its targeted populations to aid in anticipating disparities between the demographic makeup in the community and its tenant base and adjust its marketing accordingly. The basic tenets of a fair housing assessment include the following elements²:

Strategic Goal #2: Educate PHA Staff and Support Community Engagement and Education Around AFFH Issues.

The PHA provides regular fair housing training for its staff. Additionally, the PHA participates in Fair Housing symposiums and presentations of Consolidated Plans with the City of Bay City with Legal Services of Eastern Michigan. including holding public meetings annually with its public housing scattered site tenants to discuss issues and receive suggestions from the community.

Strategic Goal # 3: Assess Fair Housing Issues: Identify and Prioritize Contributing Factors

Awareness of contributing factors in the PHA's service areas (Bay City, MI.) serves to elevate the standards for the entire community, ensuring each household needing safe and affordable housing has equal access. The PHA's shall partner with the City of Bay City whenever possible to survey and identify factors contributing to a lack of fair housing in the market.

¹ Bible, Luke 4:23. "Physician, heal thyself" (Latin: Medice, cura te ipsum) is a proverb used in literary texts from at least the 6th century B.C. The moral of the proverb is that physicians should care for themselves in order to better care for the illnesses of others

² AFFH FACT SHEET: THE FAIR HOUSING PLANNING PROCESS UNDER THE AFFH RULE

Systemic Issues: In most markets there are identifiable managers and landlords that operate at the bottom of the spectrum of quality, safe and housing. These lower-tiered landlords make their markets serving a segment of the population that is oftentimes inaccessible to housing by a lack of income, poor landlord history, lack of family or community support systems, racism and other forms of bias and discrimination, chronic mental and physical health issues not sufficiently addressed or treated. These conditions all contribute to unfair and predatory treatment of those households that “*fall through the cracks*” of our society. In the final analysis, Fair Housing is an ownership responsibility. All a community can do is to regularly monitor and inspect the quality of all its housing, requiring minimum standards for habitability. Landlord’s must be held accountable to Federal, state and local laws applicable property management and occupancy laws.

Macro-view of Assessing Fair Housing:

It is a commonly expressed view that there is insufficient affordable housing in the country to address the critical needs, much less the total need. This holds true in the Bay City market as well. The concept of “fair access to affordable housing” is shaped by the programmatic and economic limitations within the marketplace, not all of which can be considered systemically unfair. Fair and open access to affordable housing is directly impacted by household income, quantity and quality of housing inventories. The best we can strive to achieve are communities where there is fair and equal access to the housing each household has the capacity to afford without being brutally “housing cost burdened”. The contributing issues to systemic or situational bias are: lack of integration based on race, color, religion, sex, familial status, national origin, and disability; racially or ethnically concentrated areas of poverty (R/ECAPs) within the jurisdiction and region; disparities in access to opportunity for any protected class within the jurisdiction and region; and disproportionate housing needs for any protected class within the jurisdiction and region. These conditions would likely exist in far fewer numbers if we could somehow separate systemic barriers from general economic and market conditions.

Notwithstanding progress in combatting some types of housing discrimination, the systemic and pervasive residential segregation that was historically sanctioned (and even worsened) by Federal, State, and local law, and that the Fair Housing Act was meant to remedy has persisted to this day. In countless communities throughout the United States, people of different races still reside separate and apart from each other in different neighborhoods, often due to past government policies and decisions. Those neighborhoods have very different and unequal access to basic infrastructure (streets, sidewalks, clean water, and sanitation systems) and other things that every thriving community needs, such as access to affordable and accessible housing, public transportation, grocery and retail establishments, health care, and educational and employment opportunities— frequently because government itself has intentionally denied resources to the neighborhoods where communities of color live. And this segregation is perpetuated by policies that effectively preclude mobility to neighborhoods where opportunity is greater.

Moreover, inequities in real housing choice do not exist solely on race or color lines, but across all the classes the Fair Housing Act protects. Individuals with disabilities too frequently are excluded not just from buildings but from whole communities because of lack of accessible and affordable housing. The widespread lack of quality affordable housing shuts out families with children and members of other protected class groups.³

Strategic Goal #4: Set Fair Housing Goals and Priorities: The PHA's Core Organizational Goals stated in its PHA Plans have been synergistically designed to provide an effective path forward for the organization. The core objectives affirm reflect the need to have Fair Housing practices in the forefront:

- a. PHA Goal #1: Optimize Performance
- b. PHA Goal #2: Assure Fair Housing Policies, Programs and Practices
- c. PHA Goal #3: Address Community Housing Needs

³ Affirmatively Furthering Fair Housing: A Proposed Rule by the Housing and Urban Development Department on 02/09/2023