Leelanau County Housing Action Committee (HAC) Meeting

<u>Date</u>: Monday, December 12, 2022 at 3:00 PM <u>Location</u>: Leelanau County Government Center

8527 E. Government Center Dr.

Suttons Bay MI 49682

(Proceedings of the meeting are being recorded and are not the official record of the meeting; the formally approved/accepted written copy of the minutes will be the official record of the meeting.)

(Please silence any unnecessary cellular/electronic devices)

Draft Agenda

Call to Order

Proposed Agenda

Public Comments

Staff Comments

Consideration of October 10, 2022 Minutes pgs 2-5

Old Business

Discussion / Action

- 1. Legislative Update: Zachary Hillyer, Housing North, Leelanau County Housing Ready Program Director pgs 6-7
- 2. Financing Affordable Workforce Housing (Clements) pgs 8-10
- 3. Update/Comments on 8th Annual Housing Summit (Oct 27-28, 2022)
- 4. 2022 Goals pg 11
- 5. Other

Communication Items

MEDC – Affordable Housing Myths pgs 12-15

Staff Comments

Member Comments/Chair Comments

Adjournment

2022 Members:

Lois Bahle, Chair
Melinda Lautner, Vice-Chair
Frank Clements
Rick Foster
Phil Hallstedt
Tony Lentych
Casey Noonan
John O'Neill
Sharon Oriel
Ty Wessell

Claire Wood Steve Yoder Resource: Yarrow Brown, Housing North A regular meeting of the Leelanau County Housing Action Committee (HAC) was held on Monday, October 10, 2022 at the Leelanau County Government Center.

CALL TO ORDER

Meeting was called to order at 3:05 pm by Chair Lois Bahle.

ROLL CALL

Members Present: L. Bahle, F. Clements, R. Foster, P. Hallstedt, M. Lautner, T. Lentych,

J. O'Neill, S. Oriel

Members Absent: T. Wessell, C. Noonan, S. Yoder, C. Wood

Staff Present: J. Herman

Public Present: Y. Brown, Z. Hillyer, W. Irvin, L. Mawby, K. Wizinsky

Bahle asked each member to give a brief introduction of themselves. Members of the public also participated in introductions.

CONSIDERATION OF AGENDA

Clements asked Lentych about an article on 600 units going in Traverse City. Lentych said he would look into it and bring it for discussion next meeting. Hallstedt added Farm Stay as Item #4 in Discussion/Action. Bahle added Michigan House Bill 4722 as Item #5 in Discussion/Action.

It was moved by Foster, seconded by Clements to accept the agenda as amended. Motion carried 8-0.

PUBLIC COMMENTS - None

STAFF COMMENTS – None

CONSIDERATION OF AUGUST 8, 2022 MINUTES

The minutes were accepted by consensus, as presented.

OLD BUSINESS - None

Discussion / Action

 Introduction: Zachary Hillyer, Leelanau County Housing Ready Program Director at Housing North Brown introduced Hillyer and mentioned his first day was September 19 and he has been going over his work plan. Hillyer thanked HAC for the invitation, support, and creation of the position. He is originally from Ohio and has worked in various housing capacities throughout his career. He worked in fair housing, legal aid and most recently in public housing agency in Toledo. Hillyer has many skillsets to address housing needs in Leelanau County. He appreciates those who have reached out and helped him get familiar with the area.

Brown asked if each HAC member represents each township in the county. Bahle replied that most townships are covered but they are missing a few townships to represent and would like to get more

members. Brown thought the introductions at the beginning of the meeting was beneficial and suggested if members could introduce Hillyer at their township meetings. Bahle agreed.

Hallstedt asked Hillyer about his passion and interest for housing. Hillyer said he has been passionate about working in affordable housing space and housing opportunities for everyone. He was drawn to this position because it is in housing and he can have an impact in the community. He now has the opportunity to meet people and address the pressing need. Hallstedt asked Hillyer what are over arching hurdles he sees in each area and how can he help? Hillyer said they have opportunities with township zoning updates that can help with the housing stock market. There are also a number of strategies to ensure that certain houses can remain as long-term rentals year-round. He understands that short term rentals (STR) are apart of the economy, but there needs to be a balance of both.

Brown said that Hillyer's goal is to be guided by the goals of Leelanau County for housing. They do not have a specific template for this program as this is the first time they are bringing this to Leelanau County.

(Oriel left the meeting at 3:30pm)

Clements would encourage everyone to host Hillyer at their township. He took Hillyer to Empire Township and toured various parts of the area so he can get a lay of the land. Bahle looks forward to showing Hillyer the Suttons Bay Township and Village area.

- 2. Discussion: Goals / recommendations for Housing Ready Program Director and how HAC can interact. Lentych revisited Clement's suggestion from earlier to visit each township in the county. He said he didn't want some areas to be ignored because there isn't a member associated with each township. Bahle suggested they reach out to township planning commissions for new members.
- 3. Update: Homestretch Marek Rd/Suttons Bay Jon Stimson was unable to attend the meeting. Via text to Brown, he said he still has a gap of \$125,000.00 and is hoping to get funds from MEDC. There is no deadline at this time to raise funds.

4. Farm Stay

Hallstedt explained how farm stay can relate to housing. It is a way to keep workers here so they can live here and send their kids to school. One issue he runs into is that farmers can't rent out the housing they hold for seasonal employees. If they were to build to code, they could rent it when seasonal employees are not present. Another issue is that the state of Michigan allows up to four campsites but is currently not passed in Leelanau Township. Farm Stay is allowed in Cleveland Township as a working farm and he would love to talk about this topic to any township that may be interested. Bahle asked if this was a work stay situation? Hallstedt replied no, this is a temporary solution for up to 30 days such as "glamping".

Lautner asked why there was a limit of four campsites? Is there a scale depending on how many acres of land? Hallstedt said that according to the state of Michigan five or more sites is considered a campground. For a working farm, the owner must live on the parcel and will need to provide five years of taxes to qualify.

Bahle asked Brown if farm stay would qualify as a tool? Brown said she would have to bring it forward to her board. However, their focus is for year-round housing in year-round climate. It could be something she can look into. Hallstedt said work force housing is one way to address seasonal housing. Brown suggested Sleeping Bear Gateways Council would be a really good partner as that is their main focus.

Lautner likes the idea of utilizing unoccupied seasonal housing. It could be beneficial for a teacher from September-May and it is income for the farmer. Her biggest issue would be getting the tenants out in time for the seasonal workers. There has to be some legislative language to protect the farmer.

Clements asked if the state of Michigan would weigh in and interfere with farm stay? Hallstedt replied that it is a local township matter. Lentych said it is a tough battle with township zoning and Hallstedt said it has been done throughout the country.

5. Michigan House Bill 4722

Bahle gave a brief explanation on the legislative bill on STR's. Lentych said this is a controversial topic as realtors really want this because money will be flowing in for them. O'Neill said there are over 1,000 STR's in Grand Traverse County and about 600 in Leelanau County plus hundreds more in surrounding counties. We lose around 2,000 housing units to STR's.

Brown gave an update where the house bill currently stands. It is sitting on the Senate floor until after the election around Thanksgiving. Housing North is watching this house bill closely. One concern they see is that this will take it out of commercial use into residential use. The biggest concern they will face here is how they will be regulated within the communities. Thirty percent is a high volume in Suttons Bay. They are still encouraging units of government and municipalities to think about how they are going to regulate them based on accurate numbers of STR's and year-round rentals.

Brown adds that they will soon also have a report on seasonal work force population study from Networks North West. This report will be shared at the Housing Summit and according to the data, Leelanau County has the highest number of STR's in the ten-county region. Brown will share copies of the report to members.

Bahle asked Brown if she has any language to help HAC draft a response? Brown said she will share talking points and a letter that she has sent in the past with the members.

Lentych said all Airbnb's are investments as in some are used for retirement but also rent out to make profits. Hallstedt said housing is such a personal part and they need to have some control. O'Neill said this is a matter of economic justice.

Discussion ensued.

Motion by O'Neill, seconded by Lentych, to have Bahle work on language with the help of Brown's talking points to create a letter to the Senator. Motion carried 6-1.

COMMUNICATION ITEMS – Housing Summit Oct 27-28.

The Housing North Housing Summit will be held October 27-28 at the Great Wolf Lodge.

PUBLIC COMMENT

Mawby said Peninsula Housing closed on a three-bedroom home in Suttons Bay today. They hope to do some renovation and retain the land so they can sell the home at an affordable cost within the next six months.

STAFF COMMENT – None.

MEMBER COMMENTS/CHAIR COMMENTS

O'Neill gave an update on Home Sweet Home. He said they have now identified as a non-profit organization. They are working with a national group at which he will have more information later. They are looking for buyers who have been approved for mortgages but can't touch anything in the market. He has met with an attorney to help create a deed restriction.

ADJOURNMENT

Meeting adjourned by consensus at 4:22 p.m.





MEMO

Date: December 8th, 2022

From: Yarrow Brown, Executive Director and Kent Wood, Policy Advisor

To: Leelanau Housing Action Committee

Re: Housing Michigan Coalition Bills, Legislative Priorities for 2023

Housing Michigan Coalition Bills

We are hopeful that any day now the Governor will sign these bills. <u>Here is a link to those bills.</u> <u>Here is a link to an email</u> we sent out last week along with a link to email the Governor. Included with this memo (at the end) is example language you could use in a letter or email.

In January and February of 2023, we will be hosting local and coordinating with partners on a statewide training on how to bring these tools to your community and what you need to know to use them.

Legislative Priorities for 2023

We are tracking a list of potential bills and priorities for 2023 from the Housing Summit and other events and feedback from our communities.

These include (not in order of priority):

- 1. Homestead Property Tax Credit (PRE) for year-round rentals
- 2. EGLE & LARA permitting issues (ie. Part 41)
- 3. Community Land Trust (CLT) legislation
- 4. Brownfield/TIF amendments
- 5. Community Investment Program (CIP)
- 6. Authorizing regional housing commissions
- 7. Employer Housing Tax Credit
- 8. Incentives for local zoning changes

We are also looking at some direct state budget requests or congressional earmarks to support our work in NW Michigan and will be working on proposals in early 2023.

Local initiatives/support

<u>Here is a link to a form</u> you can fill out if you wish to advocate and be more involved in housing North and want support on how to do this.

Creating pathways and partnerships for housing in Northwest Michigan.

PO BOX 1434 | TRAVERSE CITY, MICHIGAN 49685 | 231-330-7070 | info@housingnorth.org

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Draft example letter to Governor Whitmer

The Honorable Gretchen Whitmer Governor, State of Michigan P.O. Box 30013 Lansing, Michigan 48909

December 7, 2022

Re: Signing Senate Bills 362 (Brinks), 364 (Moss), 422 (Horn), and 432 (Schmidt)

Dear Governor Whitmer:

As you know, workforce housing is a critical piece of the challenge Michigan faces while it attempts to attract new growth in companies and talent.

I am writing today to urge you to sign four bills - Senate Bills 362 (Brinks), 364 (Moss), 422 (Horn), and 432 (Schmidt) - designed to create new housing tools from existing programs to spur housing development growth by bringing together builders and local units of government. These incentives are designed to cut through some of the financial barriers to building and maintaining housing units between 60-120% of the area median income (AMI). This AMI range is the most difficult to develop around the state due to many factors including the high cost of land, materials, taxes, and labor.

I hope you will continue to spur attainable and workforce housing growth in the state by signing Senate Bills 362, 364, 422, and 432.

Sincerely,

Creating pathways and partnerships for housing in Northwest Michigan.

DRAFT – For Discussion Only

To: Leelanau County Housing Action Committee

RE: Financing Ideas for Affordable Workforce Housing in Leelanau County

May 4, 2018

<u>Finding Private Sector - Non-Government Solutions to Funding Affordable Housing</u>

The County government is not in support of providing subsidies for affordable workforce housing or for the creation of a county housing agency to provide solutions. To address this condition, the Housing Action Committee (HAC) needs to pursue ways to promote and support the development and construction of affordable housing through private, non-governmental solutions.

Finding Ways to Level the Playing Field for Housing Costs

Land costs are a major cause of the competitive gap and may be the one variable in the construction process that can be subsidized or adjusted to help level the playing field.

There are several ideas to consider when trying to reduce or buy down the costs of land; donations, brownfield sites, TIF's, Enterprise zones, land banks, affordable housing trust funds, excise taxes, and self-imposed tax programs. All of these methodologies should be considered, but all do not produce the same results as some are specific to a project whereas some could support county wide initiatives.

Because we want to focus on ideas that could be applied to the whole county, we choose to concentrate on the idea of an industry self-imposed tax. Industries we decided to study are hospitality, retail, and construction. These particular industries were considered as housing is critical to their workforce and therefore would benefit proportionally to their investment in a self-imposed tax or assessment.

Self-Imposed Tax Programs in Leelanau County

Self-Imposed tax programs have been utilized over the years by industry/business associations in Leelanau County, like the cherry growers, the vintners, and the

hospitality industry. Their self-assessment approach to funding their industries were examined to learn from them and to possibly use as models for creating our own self-assessing tax programs for workforce affordable housing.

For example, we found that the Cherry Growers Associations, and the Michigan Cherry Committee raised \$1.2 million in 2017 for marketing, and the Cherry Industry Administrative Board, which raised 1.8 million in 2017 was used for promotion and research. The Leelanau Vintners have a similar program of self-assessing their businesses and then use these funds to promote their industry and businesses in Leelanau County.

Cherry Republic has over the years donated a portion of their profits to sustain agriculture in the county.

A Visitors Bureau headed by the Homestead is another excise tax technique utilized for promotional purposes and does so through PA 263 - Room Tax, a state excise tax, a public act established in 1974.

<u>Self-Imposed Tax - Illustration</u>.

To illustrate what a self-imposed tax on one of these industries could mean in the way of producing revenues for housing programs, we examined the single family construction industry.

Conceptually the construction industry could self-impose a construction excise tax based on the yearly construction permits for new, market rate, single family homes in Leelanau County. This might work as follows. Last year there were 159 permits for new single family market rate housing units in Leelanau County amounting to \$38,273,209? (From: Summary of Building Permits, December 28, 2017, Leelanau Enterprise) If a self-imposed construction or excise tax was levied by the construction industry on this amount at the rate of say 1% of its value, it would generate \$382,732 per year. These yearly revenues would in turn, be used in the county to subsidize the purchase or buy down the cost of land for affordable housing projects, or for other initiatives to promote housing. Note: the intent is not for the contractor to pay the 1% but for their client the homeowner to pay this amount as part of his construction costs.

The Benefits of a Self-imposed Tax on Construction

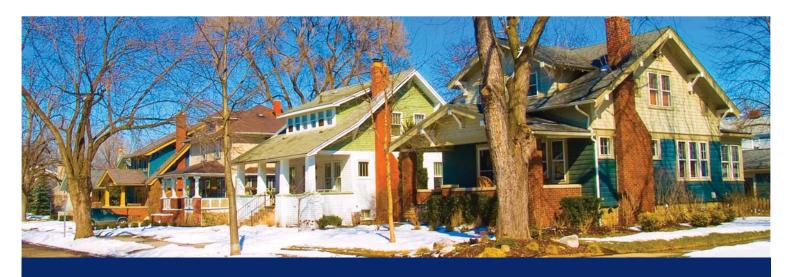
Multiple benefits are derived from this self-imposed tax concept. Foremost is that it will unlock the ability for affordable workforce housing rental units to be constructed in Leelanau County over the next several years? Second, this construction is accomplished through private investment with no government subsidies, financing or oversight. And last, developers and builders will have opened up a new market for millions of dollars' worth of construction previously not obtainable, bringing new jobs, taxes to local communities and an affordable housing model for the future.

The Housing Action Committee needs to form a small workgroup to explore these concepts with all the business stakeholders in the County in greater detail.

2022 Goals

Leelanau County Housing Action Committee (HAC)

- 1. Revise checklist (and other documents), and consider a 2nd visit with townships and villages to check on status/progress.
- 2. Map higher density zoning in the county along with available infrastructure (sewer, water, natural gas, high-speed internet, businesses, BATA, etc.)
- 3. Work with Housing North to
 - a) support a housing staff position for Leelanau County
 - b) continue annual Partnership
- 4. Promote the preservation of existing affordable homes and rental units.
- 5. Explore opportunities to work with the Land Bank Authority, non-profits, farmers and developers for land acquisition and to promote the development of new housing (seasonal, workforce, ag housing, etc.).
- 6. Prepare Public Forum pieces for publication in the Leelanau Enterprise.
- 7. Disseminate information to the community on agencies offering assistance with problems such as: foreclosure/eviction prevention, delinquent property taxes, housing repairs, etc.
- 8. Present Annual Update / Report to County Board.



Affordable Housing Myths



What you will learn:

What is affordable housing

History of housing policy

Why affordable housing isn't being built

How does affordable housing benefit communities

Housing law and discrimination

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1919 West Stadium Boulevard, Suite 4
Ann Arbor, Michigan, 48103
734.913.2000 | www.planningmi.org
info@planningmi.org
Photo Credit: CJ Peters

An often-heard comment at Planning Commission public hearings is: *I don't want those people living near me!* Decision-makers regularly feel community pressure to deny affordable housing projects with the conversation around "who" should not be allowed at the forefront of discussion.

Rather, project questions should be based on what, where, and how. What type of development is being proposed? Where will it be located? How will it meet the needs of our community? Data, education, clear expectations, and a consistent process can assist in achieving project approvals.

What is Affordable Housing?

Most (but not all) affordable housing in Michigan is now constructed using Low-Income Housing Tax Credits (LIHTC) administered by the Michigan State Housing Development Authority (MSHDA). The tax credit program was created to address a lack of quality affordable housing created by a failure of the market to produce such housing because of the costs of land, labor, and materials.

Terms

Affordable dwelling: The Federal Department of Housing and Urban Development (HUD) defines an "affordable dwelling" as one that a household can obtain for 30 percent or less of its income.

NIMBY: acronym for Not In My Back Yard. Often citizens will be okay with a particular use in general terms, but do not want it next to their property or near their backyard.

A Word about Housing Law:

The 1968 Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Several Michigan cities have adopted "source of income" ordinances which prohibit discrimination against tenants based on their source of income such as housing choice vouchers and veterans' benefits.

In 2019, a bill was introduced into the Michigan State legislature which would have the same effect statewide. Just as the developer's financing is not the business of zoning, so too should a resident's source of income be irrelevant. Planning Commissions and local legislative bodies can make the debate about a proposed housing request simpler by not considering "who" it is for. Households change over time. If it is made clear from the onset of a public hearing that it is viewed as unacceptable to discuss in negative terms potential new neighbors, then the matter of reviewing a potential development project in light of its merits as it relates to the local zoning ordinance is easier.

The program subsidizes the acquisition, construction, and rehabilitation of affordable rental housing for low-income and moderate-income tenants. Incomes are based on a specified percent of area median income (AMI) that is adjusted for the community and family size.

Affordable housing includes workforce housing, housing for veterans or for persons with disabilities, and senior housing. Affordable housing isn't always subsidized with tax credits; it could simply be smaller unit sizes that reduce the overall square footage costs of a housing unit to achieve a specific price point.

How did we get here?

Communities must recognize that there are policy legacies of Veterans Administration (VA) and Federal Housing Administration (FHA) loan programs instituted in the 1950s. These programs purposefully excluded black and brown people – preventing them from securing mortgages and buying homes and thus depriving them of the opportunity to build wealth. Home ownership remains a major factor in wealth building, and home equity is the biggest financial asset for the typical American homeowner.

Failed public housing projects like Cabrini Green in Chicago have come to embody our definition of the term affordable housing. This is an outdated view. "Section 8" housing construction (where new private housing developments were built using some federal dollars) has largely been replaced with the use of portable vouchers that are used by families to cover all or part of their rent in the private market.

Let's look at the math

In 2017, in Washtenaw County the annual median household income was \$70,509. The average rent in 2017 was \$1,062 per month (\$12,744 per year). A full-time bus driver earning \$19 per hour makes about \$38,780 per year. The full time bus driver working in Washtenaw County does not qualify for the Section 8 program because the average rental housing unit is 32% of her income. But the housing is not affordable according to the federal definition; it is about \$1,000 more per year than what an "affordable dwelling" should be. The bus driver doesn't qualify for the federal program, but she also can't afford housing close to work.

Then why is more housing needed?

Section 8 vouchers are generally for individuals and families whose income is less than 50% of the area median income. A worker may be earning 70% of the area's median income and spending 40% of it on housing. Remember that affordable housing means that a household is spending no more than 30% of its income on housing. Think about how much nurses, firefighters, teachers, restaurant servers, grocery store clerks, or hair stylists earn in a month. Multiply by .30 and that is how much their housing costs should be.

Unprecedented housing pressures created from a lack of supply, lower incomes, older adults aging-in-place, young adults with student debt, foreclosures and evictions due to job loss from economic downturns (2008, 2020), and a housing mismatch between existing household lifestyles and housing types has created a perfect storm.

In many areas, high land costs, construction labor shortages, rising material costs, limited and expensive infrastructure, and taxes, make it almost impossible to put together financially viable projects that are affordable to the workforce. These developments require some level of subsidy, whether it's from grants, tax incentives, or land donations. There are a few public funding programs available to support affordable or workforce housing, but the dollars are limited

At meetings, participants may refer to "those people." "Those people" comments typically imply that new people from outside of the community will be moving in when, in fact, the housing is for your neighbors, your children or a teacher. Many aging baby boomers have not saved sufficiently for retirement, young people are entering the worst job market in years, and middle-class incomes have stagnated. According to AARP, there is a significantly widening gap between median household income and median home prices and rents.

A good exercise is to research the average salaries of jobs in your community, rental rates, and home prices to see how they measure up. If household costs are

greater than 30% it is considered housing burdened. If it is greater than 50% the household is severely housing burdened. The United Way in Michigan has produced the Asset Limited, Income Constrained, Employed (ALICE) report which provides information about households that are above the poverty level but struggle to meet their daily needs.



Resources:

The MSHDA website has important housing information for homeownership, rental, homeless, developers, lenders, and neighborhoods. Under the "Developers" tab information is supplied for the LIHTC program including the Qualified Allocation Plan which has the scoring criteria for awards. https://www.michigan.gov/mshda/

The second largest cost for a household is transportation. The Center for Neighborhood Technology's H+T Affordability Index provides a comprehensive view of affordability at the neighborhood level. This quick resource shows population, household, and neighborhood housing and transportation costs by income. https://htaindex.cnt.org/

United Ways in Michigan have come together to release the ALICE report which highlights the magnitude of the number of households facing financial hardship, as well as the different types of households and the problems they confront. Michigan's report and county-level data is available on the ALICE website: https://www.uwmich.org/alice.

The Michigan Association of Planning offers a mini-workshop on housing for communities interested in more information on this topic.

Where should affordable housing go?

There are several factors to consider. First, affordable housing is needed where people who earn lower incomes already live so new, quality housing can be supplied near them. Next, consider your community's demographics. Economic segregation often serves as a proxy for racial segregation. Access to better schools, health outcomes, and employment are directly correlated to where people live. These factors along with proximity to transit should help a community determine where the housing should go and what kind of housing should be permitted when a community develops a master plan (or an update) and the correlated zoning ordinance updates.

MSHDA has specific place-based criteria that a developer must meet to be awarded tax credits including walkability and a mixed-use environment. Affordable housing can truly be workforce housing. Service sector jobs contribute to building a thriving downtown. In Grand Rapids, a developer who uses the Low-Income Housing Tax Credit (LIHTC) program once commented that he provides housing to "the baristas and ballerinas" of downtown Grand Rapids. Affordable housing can be viewed as "first in" housing to preserve affordability as a community grows. For example, housing costs in Traverse City have become so expensive that there is now a labor shortage for service jobs, which in turn is stunting economic growth. In high income communities like Ann Arbor, what was once a starter home is now out of reach for lower and moderate income residents who would have been the new market for such homes.

Stick to the submittal requirements

Affordable housing is not a land use. A community's zoning ordinance may list single-family homes, duplexes, or apartments. The type of financing used to construct a project is not a submittal requirement. Why, then, does it matter if a developer seeks to finance a housing development using a tax credit

program that happens to provide affordable housing? Communities should focus on the use of the property (single or multi-family housing) and the type of structure being built (freestanding home, townhouse, or apartment building) and not on financing mechanisms.

Communities must also evaluate whether they exclude opportunities for multiple family housing by prohibiting those uses, and in the process do not provide for a variety of housing types that would include many types of households.

What else can communities do?

Development and land costs make it nearly impossible to build new homes that are affordable to households earning low, moderate, and even above-average incomes. Federal, state, and local subsidies and incentives can make development more affordable, while providing guarantees that the homes remain affordable over the long term.

Articulate your vision as an inclusive community by explicitly stating your housing goals and update your master plan and zoning ordinance accordingly.

Local tax incentives are available through payments in lieu of taxes, neighborhood enterprise zones, brownfield redevelopment, and land bank authorities. The conditions under which projects are eligible for these incentives vary widely, but they help offset costs to developers, ultimately lowering rents and sale prices for residents.

And finally, Michigan State Housing Development Authority (MSHDA), Community Development Finance Institutions (CDFI's), Michigan Economic Development Corporation (MEDC), and philanthropic institutions can also provide assistance.

This tear sheet was developed by the Michigan Association of Planning (MAP) for the Michigan Economic Development Corporation (MEDC). The Michigan Association of Planning is a 501 c 3 organization, dedicated to promoting sound community planning that benefits the residents of Michigan. MAP was established in 1945 to achieve a desired quality of life through comprehensive community planning that includes opportunities for a variety of lifestyles and housing, employment, commercial activities, and cultural and recreational amenities.

