

JACKSON

Founded 1829

Community Development Block Grant
HOME Investment Partnerships Program

2019-2020 Annual Action Plan

Prepared by:
Department of Neighborhood & Economic Operations
161 W Michigan Ave
Jackson MI 49201
517-788-4012



Table of Contents

2019-2020 Annual Action Plan

Application for Federal Assistance – SF-424, SF-424B, and SF-424D

Process

AP-05 Executive Summary.....	1
PR-05 Lead & Responsible Agencies.....	4
AP-10 Consultation	5
AP-12 Participation	11

Annual Action Plan

AP-15 Expected Resources	14
AP-20 Annual Goals & Objectives.....	17
AP-35 Projects	22
AP-38 Project Summary Information	24
AP-50 Geographic Distribution.....	34
AP-55 Affordable Housing	35
AP-60 Public Housing.....	36
AP-65 Homeless & Other Special Needs Activities.....	37
AP-75 Barriers to Affordable Housing	39
AP-85 Other Actions	40
AP-90 Program Specific Requirements.....	42

Appendices

Appendix A City Council Resolution Dated May 14, 2019

Appendix B Certifications

Application for Federal Assistance SF-424

* 1. Type of Submission:

- Preapplication
 Application
 Changed/Corrected Application

* 2. Type of Application:

- New
 Continuation
 Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

B-19-MC-26-0021

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Jackson

* b. Employer/Taxpayer Identification Number (EIN/TIN):

38-60047401

* c. Organizational DUNS:

0850316560000

d. Address:

* Street1:

161 W Michigan Ave

Street2:

* City:

Jackson

County/Parish:

* State:

MI: Michigan

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

49201-1315

e. Organizational Unit:

Department Name:

Neighborhood & Economic Operat

Division Name:

Neighborhood & Economic Operat

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Michelle

Middle Name:

L

* Last Name:

Pultz-Orthaus

Suffix:

Title:

Grant Coordinator

Organizational Affiliation:

* Telephone Number:

517-768-6436

Fax Number:

866-971-2151

* Email:

mpultz@cityofjackson.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grants/Entitlement Grants

*** 12. Funding Opportunity Number:**

* Title:

Community Development Block Grant - Entitlement Community

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Various public service, public facility, rehabilitation, and code enforcement activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,227,866.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="95,950.00"/>
* g. TOTAL	<input type="text" value="1,323,816.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed:

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

*** 2. Type of Application:**

- New
- Continuation
- Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

M-19-MC260214

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Jackson

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

38-60047401

*** c. Organizational DUNS:**

0850316560000

d. Address:

*** Street1:**

161 W Michigan Ave

Street2:

*** City:**

Jackson

County/Parish:

*** State:**

MI: Michigan

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

49201-1315

e. Organizational Unit:

Department Name:

Neighborhood & Economic Operat

Division Name:

Neighborhood & Economic Operat

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

*** First Name:**

Michelle

Middle Name:

L

*** Last Name:**

Pultz-Orthaus

Suffix:

Title:

Grant Coordinator

Organizational Affiliation:

*** Telephone Number:**

517-768-6436

Fax Number:

866-971-2151

*** Email:**

mpultz@cityofjackson.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

Home Investment Partnerships Program (HOME)

*** 12. Funding Opportunity Number:**

* Title:

Home Investment Partnerships Program (HOME)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Various rehabilitation and new construction projects.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="301,299.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="35,000.00"/>
* g. TOTAL	<input type="text" value="336,299.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed:

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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

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

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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Jackson	DATE SUBMITTED

ASSURANCES - CONSTRUCTION PROGRAMS

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

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

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE Mayor	
APPLICANT ORGANIZATION City of Jackson		DATE SUBMITTED

Executive Summary

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

1. Introduction

The City of Jackson presents this One-Year Action plan as the fifth year of its 2015-2019 Five-Year Consolidated Plan and covers the period of July 1, 2019 through June 30, 2020, also referred to as Program Year (PY) 2019 or Fiscal Year (FY) 2019. PY 2019 represents the City's 45th consecutive year to receive a Community Development Block Grant (CDBG) formula allocation as an entitlement community and 28th year to receive a HOME Investment Partnerships Program (HOME) formula allocation as a participating jurisdiction.

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 continued decrease in formula allocations in both CDBG and HOME severely diminishes the funds available for eligible residents, which negatively affects the City's ability to assist its neighborhoods. As such, the Jackson City Council must select projects that will achieve the greatest possible return for the community and its residents by concentrating its efforts to stabilize and improve the overall economy. This is accomplished through the various projects and activities described in the 2015-2019 Consolidated Plan, and implemented through this Annual Action Plan. Areas of concentration include housing, neighborhoods, and infrastructure needs for low- to moderate-income areas of the City.

The results of the 2016 Master Plan found that downtown Jackson is the City's most vital neighborhood and serves as the community commons. The downtown core offers a variety of choices in commerce, entertainment, business, housing, and transportation. In response to the Master Plan, City Council has made funds available for the construction and staffing of a commercial kitchen to provide a low cost means for chefs to grow their businesses and learn associated cooking skills. Council has also allocated funds to improve streets that service low- to moderate income residences leading to the downtown. A third component of the allocation is to construct affordable structures for income eligible homebuyers using HOME funding in transitional neighborhoods.

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 of Jackson has historically utilized CDBG and HOME allocations for the implementation of activities that directly affect the community and residents by concentrating on upgraded public infrastructure, improved residential living conditions, and revitalized neighborhoods. As federal resources have diminished, the Jackson City Council developed and adopted goals and visions to improve Jackson's economic future. The Jackson Overall Economic Stabilization (JOES) program was designed and implemented as a multi-phased strategic plan to focus on budgetary initiatives concentrating on the City's housing stock, increased zoning and code enforcement, homeowner rehabilitation, and infrastructure asset management.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City encourages all citizens to participate in not only the CDBG/HOME planning process, but in all processes of the local government. At the beginning of each City Council meeting, citizens are allowed time to address the Mayor, City Manager, Council members and department heads on matters that are of concern to them. Council meetings are held on the second floor of City Hall, which accommodates persons with disabilities. Additionally, meetings are televised live on a local public access station (JTV), which also replays the meetings at various other times throughout the week and is available online for persons to view at their convenience.

Notice of the public hearing to receive citizen comments on housing and community development needs was published on January 17, 2019, in the *Jackson Citizen Patriot* (local and online newspaper). The Jackson City Council conducted a public hearing on January 29, 2019 to seek public input on housing and community development needs before writing this Action Plan. A summary of comments received from this public hearing appear in the next section.

Following Department of Housing and Urban Development (HUD) regulation, a draft Action Plan was released for a 30-day public comment period beginning March 12, 2019. A notice of availability was published in the *Jackson Citizen Patriot* on March 10, 2019 and in *The Jackson Blazer* on March 10, 2019. A printed copy of the Action Plan was also made available for review at City Hall in both the Clerk's Office (first floor) and the Department of Neighborhood & Economic Operations (third floor), the Jackson District Library Carnegie Branch, Community Action Agency, and the three (3) public housing complexes, (Reed Manor, Shahan-Blackstone North, and Chalet Terrace). An electronic version of the Action Plan is available on the City's website at <http://www.cityofjackson.org/332/Grant-Reports>.

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.

The City received input from eleven (11) citizens at the public hearing held on January 29, 2019. Five (5) citizens spoke in regards to creating and implementing a community task force to address bed bugs. Three (3) citizens spoke of the need for affordable housing including construction of "tiny homes" for low-income individuals, establishing a home for children, and a home for individuals addicted to crack cocaine. Four (4) people spoke to funding homeowner and rental rehabilitation programs, an ex-convict re-entry program, youth services, and tax foreclosure education and assistance programs. Additionally, comments were received about assisting individuals experiencing homelessness, opposition of demolition of residential properties, education on how CDBG and HOME funding can be utilized, using funds outside of the downtown, and to directly fund the Area Agency on Aging.

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

As funds are limited and restricted by Federal regulation, Council continues to prioritize community needs and comply with eligible funding allocations. The City takes all comments under advisement and diligently pursues increased communication between citizens and the City.

7. Summary

Following Jackson's Overall Economic Stabilization (JOES) program, City Council aligned the limited grant funds with projects that further the adopted goals and visions to strengthen the local economy. Specifically, CDBG and HOME funding is used to enhance the quality of life for low- to moderate-income residents by improving the community in which they live, work, and play. The priority objectives of this Action Plan support the JOES program as follows:

- Supports homeownership and downtown affordable living through strategic rehabilitation, conversion, and new construction where practical.
- Manages and right-sizes public infrastructure assets.

PR-05 Lead & Responsible Agencies – 91.200(b)

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	JACKSON	Neighborhood & Economic Operations
HOME Administrator	JACKSON	Neighborhood & Economic Operations

Table 1 – Responsible Agencies

Narrative (optional)

The City of Jackson, through its Department of Neighborhood & Economic Operations, acts as lead agency for CDBG and HOME funding and administers the programs covered by the Consolidated Plan and this Action Plan. The Department of Neighborhood & Economic Operations also carries out several of the funded activities. Various other City departments conduct the balance of programs and projects under written agreements.

Consolidated Plan Public Contact Information

Questions and comments in regards to the Consolidated Plan or this Action Plan should be directed to:

City of Jackson

Attn: Michelle L. Pultz-Orthaus, Grant Coordinator

161 W Michigan Ave

Jackson MI 49201

517-768-6436

mpultz@cityofjackson.org

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

Development of the Action Plan involved a collaborative effort between elected officials, City departments, community stakeholders, and program beneficiaries to inform and develop the priorities and strategies contained within the five (5) year and one (1) year plans. Various research analyses of census data, American Community Surveys, day-to-day data, and other pertinent planning documents are also collected by City departments and incorporated into the Consolidated Plan and this Action Plan.

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(I))

As part of the effort to implement the policies, programs, and projects identified in the five (5) year Consolidated Plan and this one (1) year Action Plan, the City’s Community Development Block Grant (CDBG) employees worked with community organizations, non-profit service providers, Public Housing Authority, Jackson County Continuum of Care participants, and other such entities.

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.

CDBG staff represent the City of Jackson through general membership on the Jackson Continuum of Care (CoC). Staff regularly attend and participate in the CoC meetings and the City consults with the CoC to develop cooperative plans and strategies to leverage resources for emergency shelters, transitional housing, permanent supportive housing, and rapid re-housing services to serve the homeless or at-risk populations. In turn, City staff keeps CoC members informed of changes in local goals, objectives, and performance measures.

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

Consultation with community organizations included, but was not limited to:

Housing: Community Action Agency, Jackson Housing Commission, disAbility Connections, AWARE INC., Jackson Interfaith Shelter, Homeless Veterans Program.

Social Service Agencies: The Salvation Army, LifeWays Community Mental Health, Training & Treatment Innovations, South Central Michigan Works!, Segue, Inc., Department of Human Services, Do'Chas II

The above noted organizations provided input via one-on-one discussions, e-mail exchanges with specific providers, and roundtable discussions at various community meetings attended by these agencies. The programs and services these agencies provide are integral to offering a full spectrum of assistance to the community especially when coupled with those offered by the City.

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	COMMUNITY ACTION AGENCY
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-homeless Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was done via email and in a group setting to gather information regarding housing and homeless issues, plus other non-housing community development needs.
2	Agency/Group/Organization	Jackson Housing Commission
	Agency/Group/Organization Type	Housing PHA Services - 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?	Consultation was conducted via email and attendance at meetings to gather information regarding public housing needs.

3	Agency/Group/Organization	Jackson County Continuum of Care
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation conducted through regular participation in monthly meetings and via email.
4	Agency/Group/Organization	disAbility Connections
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Consultation via email and in group setting to determine needs of the disabled population.</p>
---	---

Identify any Agency Types not consulted and provide rationale for not consulting

The City receives all comments and recommendations from the community. A variety of additional consultations were solicited on a limited basis, such as City departmental staff, realtors, and community stakeholders through meetings not limited to the Consolidated Plan or this Action Plan. Business and civic leaders are generally very involved with City planning and development activities through various boards, commissions, and public or private meetings; staff gathered information through these venues.

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	Community Action Agency	The Continuum of Care provides the framework and services for many of the activities designed to assist and house homeless individuals and families.
Public Housing Annual Plan	Jackson Housing Commission	The City of Jackson works with the Jackson Housing Commission (JHC) to ensure public housing goals are addressed in coordination with this Consolidated Plan. The JHC manages 540 public housing units in Jackson as well as administers 475 Housing Choice Vouchers.
Master Plan	City of Jackson	With the inception of the most recent City of Jackson Master Plan in 2016, City staff have ensured that all CDBG and HOME projects reflect the overall direction and goals of the City.
Affirmatively Furthering Fair Housing	City of Jackson	The City of Jackson continues to affirmatively further fair housing and addresses barriers to fair housing choice to the extent feasible.
Overall Economic Stabilization Program	City of Jackson	City leaders follow the goals, visions, and strategies identified in this plan to improve Jackson's economy.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Target Market Analysis	City of Jackson Downtown Development Authority	Market strategy for urban housing formats, including a combination of new construction and adaptive reuse of existing buildings.

Table 3 – Other local / regional / federal planning efforts

Narrative

The City of Jackson has established a firm commitment to enhance the quality of life for all residents, strengthen the City’s economy, and collaborate with City stakeholders to ensure an overall positive impact.

AP-12 Participation – 91.105, 91.200(c)

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

The City of Jackson’s regular involvement with other state and local governments allows for coordinated input while still retaining the unique needs and goals of the City. A direct result of these efforts is evidenced by the partnership with the Jackson County Health Department to collaborate and focus efforts on lead-based paint hazards and remediation in the City of Jackson. Additionally, the City and State of Michigan continue partnering on placemaking activities, including continued updates to major infrastructure, improvements to highway exits/entrance ramps leading to the City, and demolition of blighted residential structures.

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	URL (If applicable)
1	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	One letter from the Jackson County Continuum of Care was received and 11 citizens provided public comment on the City's housing and community development needs.	The Continuum of Care body identified several needs in the community, including a rental rehabilitation program, youth employment training/life skills (the City currently runs similar programs), bedbug intervention program, tax	City leaders take all comments under advisement and incorporate suggestions into planning when feasible.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
		Community		foreclosure education/intervention, and establish a Harm Reduction Center to address the opioid crises. Eleven (11) citizens requested City Council consider tax foreclosure intervention; program for homeowners to fix their properties (the City has run a homeowner rehabilitation program since receiving CDBG funds); more information for the purpose of the funding; rental rehabilitation program; bedbug intervention; youth services; financially support the Area Agency on Aging; harm reduction programs for drug users; address		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
				poverty issues; prisoner re-entry program; a home for children; and not using CDBG funds to demolish foreclosed, vacant, abandoned, and dilapidated housing.		

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

On February 26, 2019, City Council established preliminary allocations for fiscal year 2019-2020 CDBG and HOME funds based upon anticipated funding. On April 16, 2019, HUD published 2019-2020 formula allocations for entitlement communities and states. The actual amounts the City will receive from CDBG and HOME during the upcoming fiscal year is as follows:

CDBG

Estimated Funds: \$1,173,709 + \$95,950 PI = \$1,269,659
Actual Allocation: \$1,227,866 + \$95,950 PI = \$1,323,816
Difference: \$54,157 (4.6%) increase

Following the CDBG contingency plan stated in the Annual Action Plan, City Council raised the final allocation to **Street Lighting** to **\$79,924**. The increase in funds from what was projected also increases the spending caps for admin/planning, public services, and slum/blight projects.

HOME

Estimated Funds: \$344,274 + \$35,000 PI = \$379,274
Actual Allocation: \$301,299 + \$35,000 PI = \$336,299
Difference: \$42,975 (12.5%) decrease

Following the HOME contingency plan contained in the Annual Action Plan, City Council reduced the final allocation to **Residential Rehabilitation** to **\$55,068**. The decrease in funds from what was expected also modifies the spending thresholds for administration and CHDO reserves; however, preliminary allocations were well within the requirements and have no effect on final allocations.

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	1,227,866	95,950	995,600	2,319,416	2,319,416	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	301,299	35,000	245,198	581,497	581,497	

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

All participating jurisdictions under the HOME program must contribute 25% of every dollar in HOME funds as a match to mobilize community resources in support of affordable housing. The HOME statute provides for a reduction of the matching contribution requirement under three (3) conditions: fiscal distress, severe fiscal distress, and for Presidentially-declared major disasters covered under the Stafford Act. As such, the City of Jackson continues to receive 100% exemption from the HOME match requirements due to severe fiscal distress.

The City of Jackson is collaborating with the local chapter of Habitat for Humanity to qualify them as a CHDO. If successful, Habitat will invest private and corporate donations they receive into qualified projects to ensure successful completion.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City acquires tax reverted parcels annually to amass contiguous land for future commercial or residential redevelopment opportunities. An affordable, new housing construction project is currently in the planning stages with a potential CHDO utilizing several of these parcels during PY 2019.

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	CDBG Administration/Planning	2015	2019	Admin/Planning		CDBG Administration/Planning		
2	Public Services	2015	2019	Non-Housing Community Development		Public Services		Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
3	Public Facilities and Infrastructure Improvements	2015	2019	Non-Housing Community Development		Public Facilities and Infrastructure Improvements		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted
4	Code Enforcement	2015	2019	Non-Housing Community Development		Code Enforcement		Housing Code Enforcement/Foreclosed Property Care: 300 Household Housing Unit
5	Residential Demolition	2015	2019	Non-Housing Community Development		Residential Demolition		Buildings Demolished: 13 Buildings

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Residential Rehabilitation	2015	2019	Affordable Housing		Rehabilitation		Homeowner Housing Rehabilitated: 10 Household Housing Unit
7	Acquisition/Rehabilitation/Resale	2015	2019	Affordable Housing		Rehabilitation CHDO Reserve		Homeowner Housing Added: 5 Household Housing Unit Homeowner Housing Rehabilitated: 1 Household Housing Unit
8	HOME Administration	2015	2019	Administration		HOME Administration		
9	Multi-Family Rehabilitation	2015	2019	Accessible Housing				Homeowner Housing Added: 4 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	CDBG Administration/Planning
	Goal Description	Staff and related costs required for overall program management, planning, coordination, monitoring, reporting, and evaluation.
2	Goal Name	Public Services
	Goal Description	<p>The Jackson City Council elected to fund the very successful King Center Summer Youth Program, which has added a new component called OPEN E.Y.E.S. (Empowering Youth through Employment Strategies). OPEN E.Y.E.S. will focus on employment and training for youth aged 14 - 18 years old. The King Center Summer Youth Program is located in Census Tract 11, Block Group 2 and serves approximately 400 disadvantaged youth from June until August. Program participants are fed free breakfast and lunches, and participate in various recreational activities, educational field trips, cultural exposure opportunities and many other activities and lessons.</p> <p>Two new programs will begin in PY 2019. One provides a summer youth program at Loomis Park for children age 5 through 12 similar to the King Center program but on a smaller scale. The Loomis Park Playground Program will primarily serve disadvantaged youth in the northeast quadrant of the City. The other project, the Summer Work Core, provides hands-on job opportunities for young people learning maintenance and landscape skills.</p>

3	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	<p>Build-out of a commercial kitchen incubator will begin during PY2019 in a City-owned building (135 W. Cortland St., Jackson, MI 49201). When completed, the project provides an affordable means for home businesses and start-up restaurants to expand their capabilities within the City of Jackson. The incubator will also incorporate a marketplace to sell goods, a Festival Kitchen, and a cafe with seating,</p> <p>Construction costs for two (2) street reconstruction projects:</p> <ul style="list-style-type: none"> • Third St: Washington Ave to Michigan • Washington Ave: First St to Fourth St <p>Special Assessment Relief for low-income homeowners residing on streets reconstructed with CDBG.</p> <p>Street lighting in CDBG-eligible low income areas.</p>
4	Goal Name	Code Enforcement
	Goal Description	The City Attorney's Office provides legal services for various code enforcement activities including housing code enforcement and and blight elimination, contract review, and approval.
5	Goal Name	Residential Demolition
	Goal Description	Vacant, foreclosed or abandoned residential structures creating a blight in their neighborhood will be demolished in CDBG-eligible areas of the City. Assistance is limited to no more than 30% of the City's annual CDBG expenditures.
6	Goal Name	Residential Rehabilitation
	Goal Description	Both CDBG and HOME funds provide no interest, low monthly payment rehabilitation loans to low-income homeowners to bring their properties up to code. CDBG also provides similar loans to homeowners to correct emergency hazards that may arise, such as leaky roofs, sewer backups, non-working furnaces during winter months, etc.

7	Goal Name	Acquisition/Rehabilitation/Resale
	Goal Description	This activity will be utilized by the City's Community Housing Development Organization (CHDO) for future development to provide low income housing. Sub-Recipient: Habitat for Humanity will utilize HOME funding for the construction of low income residential properties.
8	Goal Name	HOME Administration
	Goal Description	Staff and related costs required for overall program management, monitoring, reporting, and evaluation.
9	Goal Name	Multi-Family Rehabilitation
	Goal Description	New construction of multi-unit homeowner townhouses.

Projects

AP-35 Projects – 91.220(d)

Introduction

On February 26, 2019, City Council established preliminary allocations for fiscal year 2019-2020 CDBG and HOME funds based upon estimated funding factoring a 3% decrease from 2018-2019. On April 16, 2019, HUD published 2019-2020 formula allocations for entitlement communities and states. The amounts apportioned to the City of Jackson during the upcoming fiscal year are as follows:

CDBG

To address housing and community development needs for its residents, Jackson will receive \$1,227,866, which is a 1.5% increase from 2018-2019 CDBG funding levels. In addition, an estimated \$95,950 program income received between July 1, 2019 and June 30, 2020 will provide a total grant investment of \$1,323,816.

HOME

The purpose of HOME funds is to provide decent, safe, sanitary, and affordable housing for the community; however, the 15.1% decrease in HOME funds for fiscal year 2019-2020 significantly impacts that directive. The City of Jackson will receive \$301,299 as its direct HOME allocation plus expects to collect \$35,000 program income through the year which totals \$336,299.

Projects

#	Project Name
1	CDBG Administration/Planning
2	King Center Summer Youth Program
3	Work Core
4	Loomis Park Playground Program
5	Kitchen Incubator Manager
6	Jackson Culinary Incubator Kitchen
7	Code Enforcement- Legal Services
8	Street Reconstruction- Third St: Washington Ave to Michigan Ave
9	Street Reconstruction- Washington Ave: First St to Fourth St
10	Street Reconstruction: Special Assessment Relief-2019
11	Street Reconstruction: Lighting in Low-Mod Income Areas
12	Residential Demolition
13	Residential Rehabilitation
14	New Construction
15	CHDO- Reserve

Table 7 - Project Information

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

Correcting public infrastructure needs continue to be a priority for both City Council and area residents. Meeting this objective is extremely costly, making less funds available for other activities and projects important to the community. City leaders continue to follow the Jackson Overall Economic Stabilization plan and 2016 Master Plan goals by directing a majority of funds toward reinvigorating its downtown core and has started to expand the focus into neighborhoods immediately adjacent to the downtown.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Administration/Planning
	Target Area	
	Goals Supported	CDBG Administration/Planning
	Needs Addressed	CDBG Administration/Planning
	Funding	CDBG: \$102,550
	Description	Staff and related costs required for overall program management, planning, coordination, monitoring, reporting, and evaluation.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable to this activity
	Location Description	Staff in the City's Department of Neighborhood & Economic Operations are charged with administration and planning duties related to CDBG. Staff offices are located on the third floor of City Hall at 161 West Michigan Avenue, Jackson, MI 49201.
	Planned Activities	Overall program management, planning, coordination, monitoring, reporting, and evaluation

2	Project Name	King Center Summer Youth Program
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$20,000
	Description	Youth program operating for eight weeks in the summer when children are out of school.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	400 disadvantage area youth
	Location Description	Martin Luther King Jr. Community Center, 1107 Adrian Avenue, Jackson, MI 49203
	Planned Activities	A new component to the King Center Summer Youth Program, OPEN E.Y.E.S. (Empowering Youth through Employment Strategies) program will focus on employment and training for youth ages 14-18.
3	Project Name	Work Core
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$23,552
	Description	Work/education programs for six (6) weeks through the City of Jackson Park System.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Twelve (12) teens and young adults from families with low- to moderate-incomes.
	Location Description	City of Jackson Parks system serving CDBG-eligible low- to moderate-income areas.
	Planned Activities	Provide seasonal employment for young people in the community including education on landscaping and park systems.

4	Project Name	Loomis Park Playground Program
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$8,640
	Description	New summer youth program for children ages 5-12, Monday-Friday at Loomis Park, providing activities and partnering with Jackson Public Schools for the summer lunch program.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	200 disadvantaged youth for neighborhoods surrounding Loomis Park
	Location Description	Loomis Park Boos Center, 210 Gilbert St. Jackson, MI 49201
	Planned Activities	Provide outdoor activities, trips, camps, and lunch to children ages 5-12.
5	Project Name	Kitchen Incubator Manager
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$100,000
	Description	Job training for a kitchen incubator manager, including costs to operate and maintain that portion of the facility in which the service is located.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	135 W Cortland St. Jackson, MI 49201
	Planned Activities	Hire and train kitchen manager to oversee day-to-day operations of CDBG-funded kitchen incubator. Kitchen manager will coordinate work space, schedules, activities, etc. to ensure eligible participants and smooth operation of the kitchen facilities.

6	Project Name	Jackson Culinary Incubator Kitchen
	Target Area	
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$150,000
	Description	Build-out of a commercial kitchen incubator to allow low-income home business owners and restaurant entrepreneurs to expand their capabilities.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The City does not anticipate a particular number and type of family that will initially benefit from the kitchen build out; however, the facility will provide beneficial opportunities to individuals and families when completed.
	Location Description	135 W Cortland St, Jackson, MI 49201
	Planned Activities	The Jackson Culinary Incubator Kitchen will provide an affordable facility for home business owners and restaurant entrepreneurs to expand their business within the City of Jackson.

7	Project Name	Code Enforcement- Legal Services
	Target Area	
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$28,700
	Description	The Jackson City Attorney's Office provides legal support for housing code and blight ordinance enforcement prosecution, contract review, and approval.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately three hundred (300) code enforcement citations will be issued to properties violating housing codes, garbage, vehicle, zoning, and noxious weed ordinances in low-to moderate-income areas .
	Location Description	City Attorney's Office, 12th Floor City Hall, 161 W Michigan Ave, Jackson, MI 49201
	Planned Activities	<p>Review of code enforcement activities to address the elimination of blight and improve the housing stock in CDBG eligible areas. Consult with CDBG code enforcement inspectors regarding code, search warrant, garbage/clean-up, zoning, and legal issues.</p> <p>A staff attorney handles the legal work through the Administrative Hearings Bureau (AHB) to prosecute code enforcement actions in CDBG-eligible areas.</p>

8	Project Name	Street Reconstruction- Third St: Washington Ave to Michigan Ave
	Target Area	
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$200,000
	Description	Reconstruction of 0.13 miles on Third St: Washington Ave. to Michigan Ave.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	According to the 2019 Low/Mod Income Summary Data (LMISD) 590 low- to moderate income persons reside in this area.
	Location Description	Third Street between Washington and Michigan Avenues in Census Tract 9, Block Group 1
	Planned Activities	Reconstruction of 0.13 miles on Third Street with new water main.
9	Project Name	Street Reconstruction- Washington Ave: First St to Fourth St
	Target Area	
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$280,000
	Description	Reconstruction of Washington Ave from First St to Fourth St.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	According to the 2019 Low/Mod Income Summary Data (LMISD), 590 low- to moderate-income households are located in this area
	Location Description	Washington Ave from First St to Fourth St in Census Tract 9, Block Group 1
	Planned Activities	Pavement replacement with spot curb repair and new water main

10	Project Name	Street Reconstruction: Special Assessment Relief-2019
	Target Area	
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$25,000
	Description	Special Assessment Relief for low-income homeowner directly affected by street reconstruction.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Up to 30 residential properties front streets being reconstructed and may be eligible for special assessment relief if they are low-income homeowners.
	Location Description	Low-income homeowner occupied residential dwellings on streets receiving CDBG funds for reconstruction
	Planned Activities	Special assessment relief made available for low-to moderate-income homeowners to cover the public improvement capital costs not funded by CDBG resulting from street reconstruction.
11	Project Name	Street Reconstruction: Lighting in Low-Mod Income Areas
	Target Area	
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$79,924
	Description	Lighting in various CDBG-eligible low- to moderate-income areas throughout City.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This information is not available until specific locations are determined.
	Location Description	Various CDBG-eligible low- to moderate-income neighborhoods within the City of Jackson.
	Planned Activities	Improve the accessibility of neighborhoods by installing additional street lighting where needed.
	Project Name	Residential Demolition

12	Target Area	
	Goals Supported	Residential Demolition
	Needs Addressed	Residential Demolition
	Funding	CDBG: \$259,000
	Description	Demolition of foreclosed, vacant, or abandoned residential properties within CDBG-eligible areas across the City.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Limited to no more than 30% of the City's annual CDBG expenditures, approximately 13 residential structures will be demolished.
	Location Description	Eligible sites will be determined based upon Section 106 review and located in CDBG-eligible areas within the City.
	Planned Activities	Demolish foreclosed, vacant, or abandoned residential structures within CDBG-eligible neighborhoods.

13	Project Name	Residential Rehabilitation
	Target Area	
	Goals Supported	Residential Rehabilitation
	Needs Addressed	Rehabilitation
	Funding	CDBG: \$46,450 HOME: \$55,068
	Description	Residential Rehabilitation
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	To be determined
	Location Description	Site specific projects will be identified during the grant year. Administration of this program will be conducted by the City's Department of Neighborhood & Economic Operations, located on the third floor of City Hall, 161 West Michigan Avenue, Jackson, MI 49201.
Planned Activities	Provide no interest, low payment, 20 year loans to income qualified homeowners to immediately cure an emergency hazard situation, such as non-working furnace or leaking roof, or to bring a home into compliance with the City's Housing Maintenance Code.	
14	Project Name	New Construction
	Target Area	
	Goals Supported	Acquisition/Rehabilitation/Resale
	Needs Addressed	CHDO Reserve
	Funding	HOME: \$20,000
	Description	Construction of new affordable homeowner housing.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Four (4) low- to moderate income families
	Location Description	This activity is currently planned in Census Tract 10, Block Group 1
Planned Activities	Construction of residential homes to be sold to eligible low-income individuals or families.	

15	Project Name	CHDO- Reserve
	Target Area	
	Goals Supported	Acquisition/Rehabilitation/Resale
	Needs Addressed	CHDO Reserve
	Funding	:
	Description	Set-aside no less than 15% of the City's 2019-2020 HOME allocation to a CHDO-eligible activity.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	One (1) low-to moderate-income family
	Location Description	Specific site location to be determined.
	Planned Activities	Acquire and rehabilitate a home for resale to a low-income family.

AP-50 Geographic Distribution – 91.220(f)

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

The City will utilize CDBG and HOME funding with parallel goals consistent with the 2016 Master Plan. Funding will be allocated to address improvement to the downtown and immediately adjacent neighborhoods as well as various other low to moderate income areas of the City. Projects include Third Street: Washington Ave to Michigan Ave, Washington Ave: First Street to Fourth Street reconstruction, rehabilitation, code enforcement, lighting in low-moderate income areas, and kitchen/market incubator.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City did not select a specific target area to invest grant funds in its 5-Year Consolidated Plan; however, over the course of the Consolidated Plan it is apparent the downtown and adjoining neighborhoods have benefited most. Both public and private investment in the downtown has increased choices in housing, commerce, entertainment, business, and transportation. As this redevelopment continues in downtown, those neighborhoods immediately adjacent thereto are brought into the revitalization plans. From blight removal and land amassing by the City, historically disadvantaged areas are gaining attention as desirable redevelopment ready spaces.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Jackson will utilize its HOME funds to rehabilitate existing residential units for income-qualified individuals or families. Through the designated Community Housing Development Authority Organization (CHDO) and/or Habitat for Humanity, funding will be used for new construction. The City of Jackson will continue its homeowner residential rehabilitation and emergency hazard programs, both of which offer zero interest, low repayment, forgivable loans, to offer affordable home maintenance to low-income households.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	6
Special-Needs	0
Total	6

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	4
Rehab of Existing Units	2
Acquisition of Existing Units	0
Total	6

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

AP-60 Public Housing – 91.220(h)

Introduction

The City's Public Housing Authority, the Jackson Housing Commission (JHC), provides 540 public housing units within three (3) Asset Management Projects (AMP) and administers 475 Housing Choice Vouchers (more commonly referred to as "Section 8"). The AMP locations area as follows:

Chalet Terrace - located in the southeast corner of Census Tract 11, Chalet Terrace provides 100 public housing units in 44 separate buildings. This AMP also has 26 scattered site, single family homes in Census Tracts 11 and 12.

Reed Manor - this location houses the Central Office and is the largest and oldest of the three AMPS. It is located on the western edge of Census Tract 6, north and west of the downtown loop and provides 292 public housing units in nine separate two-story buildings.

Shahan-Blackstone North - provides 108 public housing units in 24 separate buildings located north of downtown near the norther jurisdictional boundary and, although it is over 30 year old, is the newest public housing complex. Shahan also has 14 scattered site, single family homes in close proximity in Census Tract 2.

Under the Housing Choice Voucher program, HUD voucher recipients are allowed to select housing in the private market. In addition to JHC, Community Action Agency also administers over 300 vouchers for the Michigan State Housing Development Authority (MSHDA). Even though the program provides a choice of where to live, the highest vouchers concentrations within the City are in Census Tracts 9, 10 and 13, which are also more distressed areas of the City. The largest concentration of Section 8 vouchers in Jackson County is in Summit Township, immediately west of the City limits.

Actions planned during the next year to address the needs to public housing

During 2019-2020, the Jackson Housing Commission will continue to integrate services to stabilize the tenant base and promote personal and economic self-sufficiency. The Jackson Housing Commission has a full-time on-site case manager to address needs, connect to community resources, and act as liaison and advocate for tenants.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Jackson Housing Commission partners with community service providers and faith-based organizations to teach job skills/work readiness workshops, life skills, health and nutrition classes, provide on-site HeadStart program, and other such amenities.

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

Introduction

The City of Jackson has neither the facilities nor resources available to provide an impact on homelessness and other special need activities. The Jackson County Continuum of Care (CoC), and its participating public/private agencies receive direct funding from HUD for supportive housing programs. Emergency Solutions Grant allocations from the Michigan State Housing Development Authority is also available to address homelessness prevention and rapid re-housing.

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

While the City may not have the resources or facilities to render a direct impact on homelessness, it does offer assistance to disadvantaged homeowners through housing maintenance and repair. The City does so by providing low cost, low interest, forgivable loans for emergency hazard and full rehabilitation. In addition, Habitat for Humanity provides housing for low-income homebuyers, thereby keeping the home affordable and potentially preventing a family from becoming homeless.

Outreach is conducted by the various agencies participating in the CoC, usually directed to the specific population an agency serves. Personalized case management and use of assessment tools facilitates connecting those in need to programs and resources available to the community. By assessing each household individually, case managers are able to design action plans to help individuals and families stabilize their housing and access resources to manage other life situations.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Jackson is not specifically addressing emergency shelter and transitional housing needs of homeless persons with CDBG/HOME funds, but does participate in CoC meetings to remain aware of emergent needs. Continued inspections of shelters and non-owner occupied housing units by City inspectors ensure tenants are living in decent, safe, and sanitary conditions.

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

Other public and private funds are available within the community to address these situations and are more appropriately led by agencies trained and qualified in addressing the transition to permanent housing and independent living. The City of Jackson does not receive sufficient funds to support these types of programs.

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.

Other public and private funds are available within the community to address these situation and are more appropriately led by agencies trained and qualified in helping low-income individuals and families avoid becoming homeless. The City of Jackson does not receive sufficient funds to support these types of programs.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Over 90% of the City's housing stock was built before 1978 with one-half built before 1940. The preponderance of housing units no less than 40 years old coinciding with the loss of manufacturing jobs led to an overabundance of vacant houses as the City's population quickly declined. Without homeowners possessing the financial means or skills to occupy and maintain residential properties, many once high end homes fell prey to neglectful real estate investors. Years and years of deferred maintenance, cycling through mortgage and tax foreclosures, and being converted from large single family homes to multi-family rental units contributed to significant decay and blight in the once vibrant urban setting. As renter occupied housing increased and owner occupied homes decreased, pride and community declined in neighborhoods as the population became more transient and uninvested. The City began an assertive blight elimination program in 2012, investing millions in the demolition of foreclosed, vacant, abandoned, and delapidated housing. Although a vocal minority found the approach reprehensible, their vision of housing the destitute and homeless within these significantly deteriorated and obsolete properties without any financial resources to support even the most basic needs would not work. Although it has not happened overnight, construction of new affordable housing is moving from planning stages into actual construction.

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 commissioned a study of the blight elimination's impact on preserving home values between 2012 and 2016. At the time of the study, the City spent over \$7.5 million, demolished 612 foreclosed, vacant, abandoned and deteriorated housing units, and preserved over \$30 million in home value. There is a fine line between ameliorating public policies some see as barriers to affordable housing and with those same policies improving communities where residents want to live, work, play, and learn. Balancing the need to maintain attractive communities to entice employers and jobs and also preserve housing affordable to its residents is at the forefront of actions made by Jackson's leaders.

AP-85 Other Actions – 91.220(k)

Introduction:

Although financial resources are limited, the City of Jackson will take measures to address the other actions listed below.

Actions planned to address obstacles to meeting underserved needs

Due to significantly reduced CDBG funding received from HUD, the City is unable to provide public service funds to provide direct benefits to underserved needs. However, by carefully focusing public service allocations toward investments and improvements to uplift the economic conditions of the community as a whole, a resurgence of job opportunities is anticipated.

Other public and private funding is available to social service providers and faith-based organizations to concentrate on alleviating underserved needs within the community on an individualized basis.

Actions planned to foster and maintain affordable housing

The City of Jackson administers several programs which foster and maintain affordable housing. Income qualified homeowners are invited to apply for zero-interest, low repayment rehabilitation loans to alleviate hazardous conditions through an emergency hazard program. Downtown Investor-Owned Rehabilitation allows for additional affordable units within the City's most vital neighborhood and community commons. Continued and consistent inspections of non-owner occupied housing units ensures tenants have decent, safe, and sanitary living conditions. Although the City is continuing to demolish an oversupply of vacant and obsolete housing in blighted condition, long term plans are to replace a portion of that housing with new, updated, and energy efficient infill units.

Actions planned to reduce lead-based paint hazards

Contractors applying for building permits receive information regarding the Lead-Based Paint Renovation, Repair, and Painting (RRP) rule. Additionally, code enforcement officers educate property owners and tenants by dispersing lead information packets and discussing the hazards deteriorated paint has on occupants.

The City received a Lead-Based Paint Hazard Control (LBPHC) grant through HUD's Office of Lead Hazard Control and Healthy Homes, together with \$400,000 in Healthy Homes Supplemental Funding. The LBPHC program targets housing units where low income families with children under 6 years old reside

and is open to both homeowners and landlords.

Actions planned to reduce the number of poverty-level families

The City of Jackson has neither the resources nor facilities to carry out programs directly targeted at reducing the number of households living at or below the poverty level. Utilizing CDBG and HOME funds, the City offers services and programs to ensure its low- and moderate-income residents have decent, safe, and sanitary housing options. These services and programs include, but are not limited to, housing code inspections of non-owner occupied residential properties, emergency hazard loans, construction of energy efficient residential properties, and downtown investor-owned rehabilitation grants.

City leaders are planning a poverty summit during the summer of 2019 to explore policies, programs, and projects that combat the pervasive poverty within the City of Jackson.

Actions planned to develop institutional structure

City leaders and staff II continue to develop institutional relationships through direct contact with other public, private, and faith-based agencies. Continued participation in various community-based meetings, boards, and commissions keeps City staff cognizant of the area's chronic and emerging needs.

Actions planned to enhance coordination between public and private housing and social service agencies

Several public/private housing programs are underway or in the planning stage. Community leaders are encouraged to set aside their individual goals and priorities and work together to improve the community as a whole.

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in 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.	70.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

New construction planned by the City's CHDO will rely on private funds from community

philanthropists and corporations to successfully complete.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Jackson controls the resale of homebuyer property during the period of affordability using the recapture option as follows:

- 1) Should a homebuyer receiving a direct HOME subsidy in the amount of \$5,000 or less sell the property during the affordability period, repayment of the entire direct HOME subsidy will be triggered.
- 2) Should a homebuyer receiving a direct HOME subsidy in excess of \$5,000 sell the property during the affordability period, repayment of the direct HOME subsidy will be directly tied to the length of time the homebuyer has occupied the home in relation to the period of affordability.

If there are no net proceeds from the sale or the net proceeds are insufficient to repay the HOME subsidy due, the City will recapture the amount of the net proceeds, if any. Recaptured funds will be used for any HOME-eligible activity. The homeowner will receive a return on investment only if there are remaining net proceeds from the sale after payment of all outstanding mortgages, including the HOME mortgage and closing costs.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City of Jackson controls the resale of homebuyer property during the period of affordability using the recapture option as follows:

- 1) Should a homebuyer receiving a direct HOME subsidy in the amount of \$5,000 or less sell the property during the affordability period, repayment of the entire direct HOME subsidy will be triggered.
- 2) Should a homebuyer receiving a direct HOME subsidy in excess of \$5,000 sell the property during the affordability period, repayment of the direct HOME subsidy will be directly tied to the length of time the homebuyer has occupied the home in relation to the period of affordability.

If there are no net proceeds from the sale or the net proceeds are insufficient to repay the HOME subsidy due, the City will recapture the amount of the net proceeds, if any. Recaptured funds will be used for any HOME-eligible activity. The homeowner will receive a return on investment only if there are remaining net proceeds from the sale after payment of all outstanding mortgages,

including the HOME mortgage and closing costs.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There are no plans to use HOME funds to refinance existing debt secured by multi-family housing.

Appendix A

City Council Resolution

May 14, 2019

RESOLUTION

BY THE CITY COUNCIL:

WHEREAS, the City of Jackson, Michigan has prepared a One-Year Action Plan in order to procure federal funds under the Housing and Community Development Act of 1974, as amended, and the Cranston-Gonzalez National Affordable Housing Act of 1990, as amended; and,

WHEREAS, the City of Jackson, Michigan is required by law to provide certain assurances and certifications to the United States Department of Housing and Urban Development (HUD) as part of said procurement; and,

WHEREAS, the City of Jackson, Michigan has in place and is following a Citizen Participation Plan as required by HUD.

NOW, THEREFORE, BE IT RESOLVED, that the One-Year Action Plan is adopted and approved, the Mayor, as the official representative of the City, is authorized and directed to execute the submission of said Plan for and on behalf of the City of Jackson, Michigan, and the Mayor and the Department of Neighborhood & Economic Operations are authorized to provide such additional information as may be required and to submit said Plan to HUD;

BE IT FURTHER RESOLVED, that the City of Jackson, Michigan hereby assures and certifies that it will comply with the regulations, policies, guidelines, and requirements with respect to the acceptance and use of federal funds for these federally-assisted programs, and the City of Jackson, Michigan gives assurances and certifies that, with respect to the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME):

- A. It possesses legal authority to make a grant submission and to execute a community development and housing program.
- B. Its governing body has duly adopted or passed as an official act a resolution, motion, or similar action authorizing the person identified as the official representative of the grantee to submit the One-Year Action Plan and amendments thereto, and all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the grantee to act in connection with the submission of the One-Year Action Plan, and to provide such additional information as may be required.
- C. It is following a detailed Citizen Participation Plan which:
 1. Provides for and encourages citizen participation with particular emphasis on participation by persons of low- and moderate-income who are residents of slum and blighted areas and of areas in which funds are proposed to be used, and provides for participation of residents in low- and moderate-income neighborhoods as defined by the local jurisdiction;
 2. Provides citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by the regulations of the Secretary, and relating to the actual use of funds under the Act;
 3. Provides for technical assistance to representative groups of persons of low- and moderate-income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;

4. Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
5. Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and,
6. Identifies how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

Prior to submission of its Housing and Community Development Plan to HUD, the grantee has:

1. Met the citizen participation requirements of 24 CFR 91.105.
 2. Prepared its One-Year Action Plan in accordance with 24 CFR 91 and made the Plan available to the public.
- D. The grants will be conducted and administered in compliance with:
1. Title VI of the Civil Rights Act of 1964 (Public Law 88-352, 42 USC 2000d *et seq.*); and,
 2. The Fair Housing Act (42 USC 3601-20).
- E. It will affirmatively further fair housing.
- F. It has developed its Plan to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight, except that the aggregate use of CDBG funds received under Section 106 of the Act, and, if applicable, under Section 108 of the Act, during the 2019-2020 program year shall principally benefit persons of low- and moderate-income in the manner that ensures not less than 70 percent of such funds are used for activities that benefit such persons during such period.
- G. It has developed a community development plan for the period specified in Paragraph F above that identifies community development and fair housing needs and specifies both short- and long-term community development objectives that have been developed in accordance with the primary objective and requirements of the Act.
- H. It will not attempt to recover any capital costs of public improvements assisted in whole or in part with funds provided under Section 106 of the Housing and Community Development Act of 1974, as amended, or with amounts resulting from a guarantee under Section 108 of the Act by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
1. Funds received under Section 106 of the Housing and Community Development Act of 1974, as amended, are used to pay the proportion of such fee or assessment that related to the capital costs of such public improvements that are financed from revenue sources other than under Title 1 of the Act; or,
 2. For purposes of assessing any amount against properties owned and occupied by persons of moderate-income, the grantee certifies to the Secretary that it lacks sufficient funds received under

Section 106 of the Housing and Community Development Act of 1974, as amended, to comply with the requirements of subparagraph H(1) above.

- I. Its notification, inspection, testing, and abatement procedures concerning lead-based paint will comply with 24 CFR 570.608.
- J. It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as required under 24 CFR 570.606(a) and federal implementing regulations, it is following a residential anti-displacement and relocation assistance plan as required under Section 104(d) of the Act and in 24 CFR 570.606(c), and it will comply with the relocation requirements of 24 CFR 570.606(d) governing optional relocation assistance under Section 105(a)(11) of the Act.
- K. It has adopted and is enforcing:
 - 1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and,
 - 2. A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.
- L. To the best of its knowledge and belief:
 - 1. No federal appropriated funds have been paid, or will be paid, by or on behalf of it to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement;
 - 2. If any funds other than federal appropriated funds have been paid, or will be paid, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee or a member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and,
 - 3. It will require that the language of Paragraph L of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.
- M. It will comply with the other provisions of the Act and with other applicable law.
- N. Before committing to any HOME funds, the City will evaluate HOME Projects that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.
- O. If the participating jurisdiction intends to provide tenant-based rental assistance, the use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's annual approved housing strategy for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

* * * *

STATE OF MICHIGAN }
County of Jackson } ss
City of Jackson }

I, Andrea Muray, City Clerk in and for the City of Jackson, County and State aforesaid, do hereby certify that the foregoing is a true and complete copy of a resolution adopted by the Jackson City Council on the 14th day of May, 2019.

IN WITNESS WHEREOF, I have hereto affixed my signature and the Seal of the City of Jackson, Michigan, on the 15th day of May, 2019.

Andrea Muray

City Clerk

Appendix B

Certifications

CERTIFICATIONS

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

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

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

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

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

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

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

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Signature of Authorized Official

May _____, 2019
Date

Mayor

Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019 - 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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

Signature of Authorized Official

May____, 2019
Date

Mayor_____
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature of Authorized Official

May, 2019
Date

Mayor
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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