



PY 2009/2010 Action Plan

The CPMP Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 1 Action Plan Executive Summary:

In 1982, the Macomb County Board of Commissioners authorized Macomb County's participation as an Urban County in the Community Development Block Grant (CDBG) Program funded by the United States Department of Housing and Urban Development (HUD). The Urban County consists of 21 municipalities with cooperative agreements to receive CDBG funding. Since its inception, over \$44 million in CDBG has been distributed to these communities. In 1992 Macomb County became a Participating Jurisdiction (PJ) for HUD's HOME Program. In 2006 the Urban County joined Roseville, Sterling Heights, and Clinton Township to form the Macomb HOME Consortium (MHC), conferring entitlement status to those communities. See **Attachment 1** for maps of the MHC and Urban County jurisdictions.

The County's housing rehabilitation program is primarily funded through the HOME Program, and has assisted over 1,270 homeowners repair their homes. With HOME assistance, 21 developmentally disabled individuals now live independently, and Solid Ground Inc. has completed a 14 unit transitional housing facility, the only facility that can assist whole families in Macomb County. CDBG funds have been used to develop, expand, or improve senior centers, parks, streets and sidewalks, water and sewer facilities; and to provide essential services for lower-income, homeless and at-risk populations, thereby measurably improving the quality of life.

In 2009, the Urban County will receive \$1,655,870 in CDBG funds, while the Macomb HOME Consortium will receive \$1,350,493 in HOME, and \$13,939 in ADDI funding. The Urban County expects to generate \$4,000 in CDBG and \$16,000 in HOME program income for a combined total of \$3,020,302. This does not include an estimated \$72,760 in funds reallocated from previous years, or other non-Federal contributions. The total funding leveraged for all grants is \$17,608,641. For more detail, please refer to the SF 424, to pp. 4-5 of this document, and to the 2009 Projects File (attached), which detail specific activities.

The Macomb County Department of Planning and Economic Development (DPED), through its Community Development arm, is responsible for administering all housing and community development programs, including lead responsibility for the MHC.

Community Development formula recipients must prepare a Consolidated Plan (Con Plan), and a series of Annual Plans detailing the incremental implementation of Con Plan goals and objectives. The Consolidated and Annual Plans describe needs, and set forth objectives, programs, projects and activities (all established with citizen, stakeholder and local municipal input) to address local needs. The Con Plan is effective from July 1, 2009 through June 30,

2013. This Annual Plan, effective between July 1, 2009 and June 30, 2010, is the first increment of the Con Plan, and focuses on the Urban County's CDBG and the MHC housing programs. With vastly expanded Congressional appropriations, the County has received substantial funding for foreclosure relief and economic stimulus, and has amended its 2008 CDBG to include the Neighborhood Stabilization Program (NSP), CDBG-R and Homeless Prevention (HPRP) Programs. The CDBG Annual Plans prepared by the other Consortium members have been, or will be, submitted separately.

The CDBG, and HOME Programs have clearly defined objectives. The County's CDBG, and the Consortium's HOME Programs were, through the consolidated planning process, established to achieve statutory mandates, with 7 priority objectives established as follows:

Priority #1 – Housing: The MHC, and its members, may assist homeowners, and those who want to become homeowners, through housing repair, home maintenance and chore services, limited new construction, and down-payment assistance.

Rental assistance may include:

- 1) acquisition and (if necessary), repair, and
- 2) Housing Choice Vouchers and tenant-based rental assistance to prevent homelessness,
- 3) development of new, or rehabilitation of substandard existing, rental units.

Priority #2 – Create and Maintain Public Facilities and Infrastructure: Community and stakeholder feedback indicates a need for public works and infrastructure throughout the County. The second priority is therefore to maintain existing, and create new, public facilities and infrastructure in lower-income (LI) or blighted areas.

Priority #3 – Homeless Prevention and Services: Homelessness is an increasing concern in Macomb County, exacerbated by the region's severe economic decline and resulting home foreclosures. Programs are therefore required to assist the homeless and prevent homelessness among families which are at-risk of becoming homeless. Those with special needs are also a focus of this priority objective, which overlaps with Objective #1, sub-objective 3).

Priority #4 – Expand the Availability of Public Services: Community and stakeholder feedback indicate a need for expanded and improved human services, particularly for homeless prevention. The County will therefore provide human services to LI people, including those for special needs, homeless, and at-risk populations.

Priority #5 – Develop Effective Planning and Management Capacity: With the rapidly changing economic, social and demographic climate in the region, there is a need to develop additional planning and management capabilities.

Priority #6 – Encourage Business Retention and Attract New Businesses to Macomb County, in order to provide jobs to all residents, but particularly those from lower-income households.

Priority #7 – Battle an Epidemic of Foreclosures. There were more than 11,000 foreclosures in the County in between 2005 and 2008; a rate considerably higher than the national average, which in itself was of major proportions. The resulting crisis has catastrophic consequences for the affected families, the lending community, and municipalities. It must be addressed.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

Development in Macomb County is diverse, with older development and population centers generally, but not always, found in the south. The frequency and intensity of development generally diminishes to the north, particularly in the northeast and north central areas where, except for several smaller communities, where rural conditions predominate.

Income levels also vary by area. Incomes tend to be lower in the older suburbs and in the older cities and villages, and higher in more recently developed areas. Even there, however, one still finds scattered, small concentrations of lower income (LI) people. **We believe that the recent economic downturn has significantly altered this pattern, but have no data to confirm it.** (Attachment 2) identifies LI areas as of 2006. We will direct assistance to these areas to the extent possible. Other activities that target specific LI populations, or directly assist LI people may be undertaken throughout the Urban County.

The number and proportion of Macomb County minority residents is growing as shown in the following table, with 1990 data as a baseline.

Year of Estimate	White	African-American	Asian	Hispanic (any Race)
1990 ¹	95.8%	1.4%	1.2%	1.1%
2000	93%	<3%	2.5%	1.5%
2006 ² (est.)	88.3%	6%	3.3%	2.0%

In 1990 almost 96% of the County's population was non-minority. In 2000, that proportion became 93%, while the African-American and Hispanic proportions rose to 3% and 1.5% respectively. The remainder was Asian or Middle Eastern. Although small, these figures were roughly double those of 1990. The 2006 and 2007 American Community Surveys (ACS), moreover, confirm additional growth. The 2006 ACS shows that two communities, New Haven and Mt. Clemens, each had substantial minority populations, at 25% of the total, with African-Americans or Hispanics comprising 19%. No other community had a combined minority population exceeding 10% in 2006. The 2007 ACS recorded a dramatic increase in the number of minorities, particularly African-Americans (20%), in Eastpointe. Finally, the number of foreign-born residents, at 9.6%, is substantial. Clearly, the trends indicate increasing racial and ethnic diversity.

Race and income sometimes correlate, as racial minorities can have lower incomes, a phenomenon reflected in Mt. Clemens, New Haven, and Eastpointe. Activities will be located in LI census tracts and block groups, or serve such populations. Communities with minority concentrations will direct funding into their LI (and minority) areas. The sheer number of activities prohibits identification on a map, and the reader is referred to the Projects file for a description and location (by census tract and block group). Again, see Attachment 2.

Macomb County has a strong tradition of home rule, and therefore allocates as much CDBG funding as possible to member communities. They, in turn, have identified activities and assistance areas, based on citizen input informed by statute and regulation, to address local needs and priorities

- Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

Macomb County is not an EMSA and does not receive HOPWA funding. This question is therefore not applicable to it.

¹ Source: 1990 and 2000 U.S. Census

² Source: 2006 American Community Survey, U.S. Census

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3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

The County and MHC have excellent relationships with other municipalities, private non-profit organizations, and other partners to extend program scope, reach, and effectiveness. We will work with and through partners to address obstacles to meeting underserved needs.

- a) MCCSA - Chore Services, and Weatherization to provide home maintenance and minor home repairs to LI people who couldn't otherwise afford them.
- b) MCCSA CoC to plan comprehensively to end homelessness and obtain funding for critical homeless needs.
- c) Solid Ground to assure compliant administration of the Transitional Housing and related services necessary to help families address the root cause of their homelessness
- d) Springhill Housing Corporation to provide affordable housing and related services for developmentally-disabled persons and to prevent homelessness.
- e) Community Housing Network to provide rental assistance and homeless prevention assistance to families which could not otherwise afford decent rental housing.
- f) Habitat for Humanity to implement homebuyer assistance program.
- g) United Way of Southeast Michigan to identify critical gaps in service delivery and, if feasible, expand the array of services offered through effectively coordinated resources.
- h) other Macomb Entitlement Cities and the Southeast Michigan Urban County Collaborative to explore mutual housing concerns and opportunities.
- i) Identify the federal, state, and local resources expected-to-be-made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

As noted, Macomb County will receive \$3,020,302 in 2008 Federal grant funds. This includes \$1,655,870 (CDBG), \$1,350,495 (HOME Consortium, of which the County share is \$640,030), plus \$13,939 (ADDI). The County expects to receive \$4,000 and \$16,000 respectively in CDBG and HOME program income, plus \$72,760 in carry over CDBG funds from prior years to address the priority needs identified in the Consolidated Plan. As mentioned there is significant leverage for various community and housing projects. The exact amount of accompanying private and non-Federal public resources is difficult to estimate, given the large number of proposed projects, and the large number of stakeholders involved. The numbers below should therefore be treated as estimates. Specifics are provided in the Projects Tables in this Plan.

Public Facilities and Improvements:

Number of Projects:	24
CDBG Funding ³ :	\$1,242,000
Other Funding:	\$3,585,118
Total Resources:	\$4,787,118

Public Services⁴:

Number of Activities:	24
CDBG Funding:	\$ 258,655
Other Funding:	\$ 2,970,625
Available Resources:	\$ 3,229,280

Housing Programs: (HOME plus County CDBG emergency repair)

³ Includes reallocated CDBG funds from previous years.

⁴ Includes homeless services, comprehensive planning, and services to special needs populations.

Number of Projects:	TBD
CDBG:	\$ 4,000 (Emergency Repairs – Program Income)
HOME:	\$ 605,000 (includes \$16,000 PI)
Available Resources:	\$ 609,000

ADDI Assistance:

Number of Projects:	2
ADDI Funding:	\$ 13,939
Other Funding:	\$ 200,000 ⁵ Program Funded in 2009??
Available Resources:	\$ 213,939

Rental Assistance:	Budget	# Units
LRPH/Section 8 Assistance	\$ 6,714,012	1,285
HARP Vouchers	\$	150
MSHDA Assistance	\$ 1,400,000	900
Available Resources	\$8,114,012	2,335⁶

Homeless Assistance:

HUD SuperNOFA	\$ 771,396
MSHDA Homeless Grant	\$ 203,301
Available Resources	\$ 974,697

Total Available Resources: \$16,475,700

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

The Macomb County Board of Commissioners designated DPED as the lead agency for developing this Plan. Its staff is competent and experienced, with 26 years of successful management behind it. DPED is also lead agency for the MHC.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

This Annual Plan was developed as follows:

- The County issued a Request for Proposals from non-profit providers on October 15, 2008. This started the planning cycle for the 2009 CDBG program.
- The County held its agency workshop on October 31, 2008. Program requirements were explained and the communities were provided with paper and e-versions of all documents and support material required for successful completion of project applications.
- The County held its community workshop on December 5, 2008. Program requirements were explained and the communities were provided with paper and e-versions of all documents and support material required for successful completion of project applications.
- Staff reviewed and qualified non-profit applications, and provide an application summary to each of the 21 participating jurisdictions. Communities used the summaries to select non-profit projects.
- Public hearings were held in each community between December 5, 2008 and February 27, 2009 to encourage citizen and stakeholder comments on community needs and activities.

⁵ Based on average leverage of \$100,000 x 2 household assisted

⁶ Includes assistance from MSHDA, Clinton Twp., Eastpointe, Mt. Clemens, New Haven, Roseville, and Sterling Heights Housing Commissions. Other affordable privately rental housing and public housing not located in urban county jurisdiction not included.

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- Local applications were developed and submitted to the County by February 27, 2009.
 - The County's first public hearing (and Focus Group Meetings) were held on February 6, 2009, to solicit input on housing and service needs. Although no citizens participated, stakeholder attendance was significant. Comments obtained were incorporated into the Consolidated Plan and this document.
 - Staff reviewed the community applications, and simultaneously developed the narratives and support data for both Plans.
 - The County's Proposed Statement, including the Consolidated Plan, the Annual Plan with proposed CDBG, HOME and ADDI activities, was announced in a Notice of Proposed Final Plan, along with a Public Hearing Notice, in the Macomb Daily. The documents were made available to the public on line and at the DEPD offices.
 - On April 17, 2009 the last public hearing occurred to solicit citizen comment.
 - On May 13, 2009, after the public hearing, the Planning & Economic Development Committee of the Board of Commissioners approved the Plan, followed by the Full Board on May 21, 2009.
 - The Plan was submitted for HUD review on May 22, 2009.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

The County will, in partnership, continue to:

- a) evaluate the housing and service needs within its jurisdiction,
- b) evaluate the capability of housing and service delivery systems in order to develop and fund new programs,
- c) develop partnerships with public and private health and social service agencies such as the United Way to identify gaps in service delivery and more effectively fund across agencies,
- d) develop partnerships with other partners, including Michigan State University Extension Service, and others to address the County's foreclosure crisis.

Citizen Participation

1. Provide a summary of the citizen participation process.

Please refer to the immediately preceding Question #2.

2. Provide a summary of citizen comments or views on the plan.

No comments were received, apart from those offered at the Focus Group Meetings. These were incorporated into the Consolidated Plan, and into this document. Meeting summaries are found in Attachment 4. **Await other citizen comments.**

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

Please refer to the Consolidated Plan narrative, pp. 5-6.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

All comments received were fully considered and adopted, as appropriate, in the Con Plan.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Institutional Structure

Describe actions that will take place during the next year to develop institutional structure.

Macomb County has excellent administrative capacity, with trained, experienced and capable staff. It has relationships with a large number of communities and non-governmental partners, and these relationships have resulted in the creation of a number of innovative programs over time. This capacity, however, has been affected by the declining economy and by a resulting decline in tax revenues. New ways must therefore be found to offset the lost resources and maintain our edge. The following are therefore considered for the coming year:

Management Capacity

- The County, the MHC, and other partners will develop additional and cost-effective programs to address affordable housing needs. We will find ways to share resources and costs in order to maintain at least an acceptable level of program and management capacity.
- The County will continue working with the United Way to identify gaps in service delivery and improve the efficiency and effectiveness of human services.
- New programs and initiatives will be considered, developed, and implemented, if necessary and in keeping with the priority objectives of this Plan.

Program Administration

The NSP, CDBG-R, and HPRP have added measurably to the County's administrative burden. Given budgetary constraints the County must administer those programs with minimal impact on staff. The County has already placed its housing rehabilitation program on hold due to the critical need implement the NSP. We expect NSP to be quickly implemented, and that HOME commitment and completion deadlines will therefore be met.

CHDO Capacity Development - Springhill Housing Corporation and Solid Ground have received CHDO designation. The Consortium will continue to identify and strengthen these relationships and capacity. The Consortium recently awarded CHDO operation funding to Solid Ground with an additional application pending. It is also working closely with Springhill Housing Corporation to enhance program delivery. These efforts will enhance overall program quality.

Expanding the Network of Partners – The Consortium has strengthened, and established new, relationships with other stakeholders, including other Macomb County Entitlement Cities, the CoC, the United Way, MSUE, and the Southeast Michigan Urban County Collaborative. Finally, efforts to work with lenders to provide homeownership opportunities continue.

Sub-recipient Monitoring – The County and the Consortium will monitor sub-recipients and CHDO's in 2009, with program guidance and technical assistance planning being informed by the outcome.

Monitoring

Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

DPED will monitor its CDBG, NSP, CDBG-R, and HPR in the following manner: It will:

- a) work with citizens, local communities, other County Departments and partner agencies to prepare and implement activities and programs that meet Federal and local objectives.
- b) specifically track the implementation and accomplishments for all projects, and report annually to citizens and other stakeholders.
- c) use draw-down and related documentation for internal monitoring purposes.

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- d) work with communities and contractors to ensure Davis Bacon compliance by providing requisite forms and guidance, and by requiring a Pre-Construction Conference with the contractor to review all requirements and documentation federally funded projects.
 - e) make site visits on a selective basis, and provide technical assistance to help partners improve performance. Staff also works with each new agency to discuss project design, eligibility and national objectives compliance, billing procedures and reporting requirements.
 - f) monitor any remaining projects (greater than 2 years) and ensure that no community has excess funds (more than 1.5 years) on hand. We will take appropriate actions, including project reallocation, to ensure the timely expenditure of funds.

The County, as MHC lead, is also responsible to ensure HOME compliance. It therefore will undertake the following:

- a) regularly meet with, and assist, Consortium members concerning their questions and concerns,
- b) monitor progress, overall and by activity, through project approval and IDIS operations, and
- c) monitor projects and sub-recipients on site, including high-risk projects and activities, taking special care to evaluate HQS and tenant eligibility, the habitability of rental units acquired by Springhill Housing Corporation, and the Solid Ground transitional housing project. The latter two continue as a focus of attention given size of the project and importance to the Consortium's housing program.
- d) Although the housing rehabilitation program is currently suspended, rehab staff monitors performance and manages emerging issues as they arise.

Consortium members now have sufficient program knowledge to operate independently, and have made considerable contributions to program design and operations.

Lead-based Paint

Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

The County is compliant under the Lead Safe Housing Rule (LSHR) and no actions are required to expand capacity. The County, through its housing programs, directs assistance exclusively to ELI, LI and MI households. All units are in compliance with the LSHR, therefore the targeted population benefits.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

Housing priorities, identified in the Consolidated Plan, are based on the following assumptions:

- a) The high number of home foreclosures has strained personal and institutional systems. Large numbers of families have lost their home or are at risk of losing them. We must use vacant homes to provide homeownership opportunities and rental opportunities for these

- families. Due to the glut of homes on the market, and given an impending wave of additional foreclosures, there is, at present, little, if any, need for new single-family home construction.
- b) Families who own, or who have owned but lost, their homes, have historically outnumbered renters. This may have changed over the past three years. There are (outside of CDBG and HOME) few deep subsidy assistance programs for lower-income homeowners. The level of assistance possible through NSP, HOME and CDBG indicates continuation of homeowner assistance for housing repair and maintenance, and for providing homebuyer assistance. Should that objective prove to be impracticable, the focus of assistance could shift to renters.
 - c) Renter assistance is available through several Federal and State subsidy programs, including LRP, Housing Choice Voucher, and soon, HPR Programs. These target households with incomes $\leq 50\%$ of AMI, with a substantial set-aside for households $\leq 30\%$ AMI.
 - d) Investors may have purchased substantial numbers of foreclosed homes, intending to either sell or rent them, depending on market conditions. Due to the glut of homes on the market, and given an impending wave of additional foreclosures, there is, at present, little, if any, need for new rental construction. The specific order of priority follows:
 - a. Homebuyer assistance (primarily through NSP).
 - b. Home maintenance and chore services (primarily through CDBG).
 - c. Rental assistance, particularly for those recently made homeless and those with special needs, through housing acquisition (and minor repair), and rental assistance as needed (primarily through HOME and HPRP).
 - d. Other rental assistance including acquisition and minor repairs (primarily through HOME).
 - e. Rental rehabilitation, if appropriate and feasible (primarily through HOME).
 - e) Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

The Consortium's HOME allocation will be used in three ways. Please refer to preceding Item 4, pp. 4-5 for a list of resources available to support the County's and Consortium's housing objectives.

The County, the Consortium, and other partners will pursue additional opportunities to provide affordable housing, provided that they are consistent with Consolidated Plan priorities.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

Low cost rental housing is provided through various means. The following Public Housing Commissions and MSHDA assist roughly almost 2,200 households in the MHC jurisdiction:

MSHDA	0 LRP	900 S8
Clinton Township HC	100 LRP	21 S8
Eastpointe HC	164 LRP	131 S8
Mount Clemens HC	288 LRP	0 S8
New Haven HC	88 LRP	0 S8
Roseville HC	102 LRP	309 S8
Sterling Heights HC	<u>153 LRP</u>	<u>41 S8</u>
	795	1,402

There are, moreover, an undetermined number of families with Vouchers issued by housing commissions outside the MHC, which may have used opted to obtain housing within the

Consortium's jurisdiction. Their Agency Plans emphasize preservation and maintenance of existing units.

The Macomb CoC received, in 2008, 150 additional Housing Choice Vouchers for the homeless. This was a substantial increase. We hope to use HPRP to provide additional rental assistance to mitigate the consequences of job loss and prevent homelessness.

The County lacks sufficient resources to help any of the Macomb County housing commissions to repair and modernize their units. No MHC housing commissions is undertaking resident initiatives.

Although there is no County housing commission, the existing network of housing commissions and privately owned affordable rental developments, has proven effective in providing decent and affordable housing for LI renter households.

2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

The Clinton Township Housing Commission has open monitoring findings pertaining to its Section 8 Program, but not its Low Rent Public Housing Program. It is therefore considered troubled by HUD. None of the other housing commissions in Macomb County have been so designated. The CTHC is not within the jurisdiction of the Urban County and there is nothing that it can do to assist that entity to improve its operations.

Barriers to Affordable Housing

Describe the actions that will take place during the next year to remove barriers to affordable housing.

The County has a variety of housing types in all price ranges. There are few direct County controls over municipal decision making, but the County advises communities concerning land use policies and controls, zoning ordinances, and other municipal actions that can promote affordable housing. It also identifies trends and helps communities plan for them, for example its special report detailing the needs of a rapidly expanding elderly population, with results being shared with municipalities so that they can factor design considerations into their ordinances. Planned additional steps by the MHC and its partners during the coming year include:

- a) implementing the NSP to create conditions favorable to sustainable mortgages for eligible families. The County will, of necessity, focus on returning foreclosed homes to productive use, primarily for homebuyers but, if that should fail, the emphasis could shift to rentals
- b) implementing the HPRP to provide affordable rental housing for families who have lost their incomes,
- c) continued implementation of the HOME-funded acquisition; acquisition, repair and resale; and specialized rental activities, if practicable.
- d) collaboration with Habitat for Humanity to promote home ownership for LI families
- e) identification of additional partners to expand affordable housing throughout Macomb County.
- f) Hold further HOME housing repair program activity, but provide CDBG assistance to address documented emergencies.
- g) continue its ADDI homebuyer assistance program, which is administered by the Macomb County Community Services Agency.

h) support, to the extent possible, other reasonable proposals for affordable housing.

HOME/ American Dream Down payment Initiative (ADDI)

General Background and Special Information

Since 1992, Macomb County (and now the Consortium) have received \$12,204,186 in HOME funds, including the \$1,350,493 becoming available in 2009. The County's share is roughly \$662,000, with 15% set-aside for CHDO's and 10% for program administration. The remainder is reserved for homeowner housing rehabilitation. A breakdown is found in the projects file (Attached to this document. No significant infusions of outside funding, apart from Match are expected. The Program should generate \$16,000 in program income this year.

Program Administration

The Urban County will use \$113,726 allocated for HOME administration (10% of the base grant, including a small amount reserved for administrative costs incurred by its Consortium partners).

Affirmative Marketing

The County affirmatively markets the Program where possible, displaying the Equal Housing Opportunity logo, slogan and statement in its advertising. Any other any other owner using Consortium HOME funds for more than 5 units of rental housing must certify to the following conditions regarding the solicitation of tenants.

- use the Equal Opportunity logo, slogan or statement regarding affirmative marketing policy in all advertising;
- where appropriate to advertise, use media, including minority outlets likely to reach persons least likely to apply for the housing;
- display the Fair Housing Poster in the rental or sales office;
- where there is a project sign, display the Equal Housing Opportunity logo; and
- notify the County when vacant rehabilitated units become available.

The County will then monitor rental projects to assure compliance with affirmative marketing requirements. In the event of non-compliance, the County reminds the owner of fair housing laws and his contractual obligations, and works with him to rectify the problem. Should that fail, the County is ready to initiate appropriate action to ensure compliance.

As mentioned, the County will affirmatively market its program where appropriate. To date, there are two projects potentially subject to the Affirmative Marketing requirements, Solid Ground and Springhill Housing Corp. The latter entity has rented units to 21 developmentally-disabled individuals, who have been identified by ARC of Macomb County. ARC selects prospective candidates based on their abilities and needs and matches them to offerings from the County CHDO. The former will soon open 14 units of transitional housing with 43 beds for homeless families. Both Springhill Housing and Solid Ground provide special needs housing and neither therefore affirmatively markets their properties in the manner envisioned above.

W/MBE Contracting

The County employs licensed and insured contractors in its rehabilitation program and has been successful obtaining female-owned businesses for the program, with a significant number of contracts, and share of dollars, awarded to them.

We are trying to attract MBE's through outreach through the Michigan Minority Business Development Council.

Although WBE participation is sound, participation by minority firms lags. The County therefore continues its efforts to recruit more M/WBE vendors and contractors.

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1. Describe other forms of investment not described in § 92.205(b). *None.*
 2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

No ADDI in 2009? Possibly N/A. The Consortium will use ADDI funds for homebuyer assistance, and individual members may elect to implement homebuyer assistance activities, and the requirements at 92.254 will apply. If the homebuyer sells the property within the 5-year affordability period, the subsequent buyer must be low-income, as defined by regulation, and use the property as his/her principal residence, or the amount of HOME assistance will be recaptured. Once the homebuyer has owned the property for five years, there is no recapture. These provisions are outlined in program documents and in a separate mortgage applicable to the property.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:

The Consortium does not intend to refinance the existing debt on multi-family properties during 2009, and this section is not applicable.

- a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:

- a. Describe the planned use of the ADDI funds. *No ADDI in 2009? N/A?*

The Consortium will use its ADDI funds for down-payment assistance to qualified homebuyers. MCCSA administers the program and follows a similar approach to its Individual Development Account (IDA) Program, with changes necessary for ADDI compliance. ADDI funds match the homebuyer's contributions at a 3:1 ratio. No rehabilitation is expected in ADDI projects.

At an average cost of \$7,500 per household, 2 homebuyers will be assisted with 2008. This will not have a significant impact on need, and the County's ADDI Performance Measure is therefore simply to ensure successful homeownership, increase family stability, and enhance individual expectations deriving from that stability, for families

which could not otherwise have attained it.

- b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.

The County has developed promotional information and marketed the ADDI Program through the County's 7 housing commissions and its mobile home communities. That material was also used for individual inquiries, and is routinely used by ADDI staff in meetings with potential homebuyers, and with community groups.

- c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Macomb County recognizes that homeownership is not desirable for every household, and has therefore crafted underwriting policies to carefully screen all applicants for credit-worthiness, as well as for income eligibility. All ADDI recipients, moreover, must complete an extensive homebuyer education and training program offered through the Michigan State University Extension Program. Failure by the enrollee to complete that curriculum results in termination from the ADDI program. The County has achieved an enviable record of promoting homeownership and success over the long-term.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.

Macomb County will receive HPRP funding as a special adjunct to its 2008 Block Grant program. Those efforts are described in the application for that funding.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

The MHC Con Plan has addressed homeless needs and homelessness prevention in three separate priorities: #3, which speaks to Homeless prevention and services, #4 which speaks to the need to expand public services, and #7 which speaks to foreclosures. Please refer to General Question #3, p. 4, to Specific Housing Objectives, Question #1, on p. 8, to Needs of Public Housing, on p. 9, and to the immediately preceding Questions #1 above, and #3 below, for details as to how this will be accomplished.

The County and the Consortium are also addressing the serious foreclosure problems, which plague the region. Its 2008 NSP was launched in late March 2009 and is moving well. The HPRP will be launched later this summer, and will be a collaboration between DPED, the CoC and partner agencies.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

The County's CoC resides in the Macomb County Community Services Agency (MCCSA), and works with agencies providing homeless assistance to temporarily and chronically homeless families and individuals. The CoC has developed and recently updated its 10 Year Plan (Attachment 5) to eliminate chronic homelessness. The County will, through the CoC, apply for homeless funding through HUD, the State of Michigan, and other appropriate agencies.

4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

The CoC will implement the goals and strategies contained in the 10 Year Plan to Eliminate Chronic Homelessness, and will prepare and submit applications for HUD SuperNOFA, MSHDA, and other appropriate sources of funding as they become available.

The Solid Ground transitional housing facility is complete and operational. It will house up to 14 families and 43 persons when full. Staff will work with Solid Ground to ensure compliant administration of the facility in 2009.

Macomb County will, through its CDBG funds, assist Community Housing Network, Lighthouse Outreach, MCREST, Macomb Warming Center, MAATS-Salvation Army, Samaritan House, St. Vincent de Paul, and Turning Point which provide temporary shelter and emergency assistance to individuals which are homeless or at risk of becoming so.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

HUD advised CDBG recipients that the discharge policy requirement applies to only ESG and HOPWA. This Urban County receives ESG/HOPWA funds and the requirement is not applicable.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

This Urban County does not receive ESG funding, and this question does not apply.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

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1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

The MHC Con Plan addressed homeless needs and non-housing community development needs in two separate priority objectives:

Priority Objective #2 (p. 2 above) was established in recognition of the need to develop and maintain necessary public facilities and other infrastructure, specifically focusing on the need in LI and blighted areas of the County. The reader may also refer to Table 2 B of the Con Plan.

Priority Objective #4 (p. 2 above) was addressed above (see Questions 1 and 2 on the immediately preceding page for detail).

Priority #6 (p.2 above) has not been discussed. The 2009 Consolidated Plan identifies economic development as a priority need, although implemented through DPED's Economic Development arm, due to the severe economic downturn. As a result Economic Development staffing was substantially increased at Board of Commissioner direction in 2006, and again in 2007. Several new business development positions were established and filled by experienced professionals. This has yielded results.

DPED can also use CDBG funds, if appropriate and eligible, to attract and retain businesses. To date, CDBG funds were used for general and functional planning in one commercial area. CDBG funds could, moreover, be used to improve commercial buildings and infrastructure. DPED will also explore other opportunities to achieve the Board of Commissioner directive.

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

The following narrative, contained in the 2006 Annual Plan, describes short-term (1-3 years) and long-term (3-5 years) objectives:

Priority Objective #2 - Public Facilities and Infrastructure: Short term, roughly 35 projects will be completed. These include streets, sidewalks and public beautification, parking facilities, senior centers, parks, water, sewer and drainage facilities, and fire facilities. All will comply with regulations established at 570.208. Long term, the County expects to see 60 such projects completed, improving the lives of hundreds of County residents.

Priority Objective's #3 and 4 - Homeless Prevention and Assistance, Maintain and Expand Essential Human Services: Short-term, the County will support operations at 3 homeless facilities, and 8 organizations providing emergency assistance to the homeless and those at-risk of becoming homeless. It will also assist senior services, youth services, health care, transportation, and other required LI services to alleviate distress among hundreds of Macomb County families. Long-term, will fill gaps in the affordable housing and human services.

Priority Objective #6 – The County will evaluate the feasibility of implementing activities to attract and/or retain businesses, particularly as they relate to providing jobs for persons coming from

lower-income households. This will, at least in the short-term, be accomplished through traditional CDBG activities including general and functional planning (570.205), and improvements to buildings and infrastructure in commercial areas. Other forms of assistance may be forthcoming pursuant to Section 570.203, if practicable.

Antipoverty Strategy

Describe the actions that will take place during the next year to reduce the number of poverty level families.

The County, as mentioned, and consistent with Priority Objectives 3 and 4, promotes public services to address human service needs for LI persons. These promote positive life-styles which, in turn, increase chances for long-term emotional, familial, and employment stability. The CARE, Care House, and Turning Point programs, in particular, help families and children resolve destructive relationship issues thereby fostering long-term growth. Similarly, Community Housing Network, Lighthouse Outreach, MATTS, Macomb Warming Shelter, MCREST, Samaritan House, St. Vincent de Paul, Solid Ground, and Turning Point will help special needs populations overcome emergencies and other challenges, offering them positive alternatives. The County Health Plan, moreover, provides essential medical coverage to indigent people, who might not otherwise receive it. These soften the edge of poverty and can help families escape it.

DPED works with MCCSA **No ADDI in 2009?** to provide ADDI homebuyer assistance for LI families. That program requires recipients to show good faith by saving for their home, and by completing homeownership courses. This encourages individual responsibility, which can in turn, foster the emotional and financial stability required for successful homeownership, and for the creation of wealth.

At least 25%, or roughly \$2.4m of the County's NSP must benefit families at or below 50% AMI, and the County expects to assist roughly 46 households to obtain adequate housing.

Although CDBG does not directly address unemployment and business development and job training for reasons already mentioned, the County continues its business development assistance to businesses seeking to expand and/or locate to Macomb County. It also advises small business investors and owners, including many LI individuals establishing micro-enterprises. These efforts reduce poverty by promoting long-term employment. Staff will continue to concentrate and combine resources for maximum effect on high priority needs.

Finally, the County works with the State of Michigan's Michigan Works! Program to promote employment through matching job seekers with businesses in need of qualified workers; and with the MHC, which provides a host of services, including housing counseling for those in need.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

The Urban County and the CoC will address non-homeless special needs populations in accordance with Priority Objective #4, Providing and Expanding Essential Human Services and, to a lesser extent, in accordance with Priority Objective #1, Housing, as follows.

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- a) Services include care of, and advocacy for abused children (Care House), battered spouses and their dependents (Turning Point), CHORE Services (MCCSA and RBW Parks), Senior Programs (multiple communities), and Emergency Assistance for Families in Crisis (Lighthouse Outreach, Macomb Warming Center, MCREST, Samaritan House, St. Vincent de Paul, Turning Point).
 - b) We will serve developmentally-disabled persons with housing and affiliated supportive services HOME-acquisition assistance.
 - c) The County's Department of Community Mental Health (CMH) supports people with Severe Mental Illness, the developmentally- and physically- disabled, people who abuse substances, and persons affected by HIV/AIDS. Funding comes from the Federal and State governments.

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

As mentioned, CMH receives Federal and State funding, and distributes those funds to partner organizations to provide essential supportive services. This arrangement has been successful and is expected to continue in the future.

Housing Opportunities for People with AIDS

The Urban County, receives not HOPWA funding, and this section is not applicable.

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.

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8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
 9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

The Urban County does not receive HOPWA funding and this section is not applicable.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.
None.