



Community Development Block Grant
HOME Investment Partnerships Program

2018-2019 Annual Action Plan

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



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2018-2019 Annual Action Plan

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Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
---	---	--

* 3. Date Received: _____	4. Applicant Identifier: _____
-------------------------------------	--

5a. Federal Entity Identifier: _____	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

e. Organizational Unit:

Department Name: Neighborhood & Economic Opert.	Division Name: Neighborhood & Economic Opert.
---	---

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

Prefix: _____	* First Name: Laurie
Middle Name: L.	_____
* Last Name: Huff	_____
Suffix: _____	_____
Title: Grant Coordinator	
Organizational Affiliation: _____	
* Telephone Number: 517-768-6407	Fax Number: 1-866-971-2151
* Email: lhuff@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 and Urban Development

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

*** 12. Funding Opportunity Number:**

* Title:

Community Development Block Grant

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

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="1,210,009.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="69,250.00"/>
* g. TOTAL	<input type="text" value="1,279,259.00"/>

*** 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 - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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 project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, 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 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 progressive 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 of 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.
20. 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 
APPLICANT ORGANIZATION 	DATE SUBMITTED 

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
---	---	--

* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>
--	---

5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>
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State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
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8. APPLICANT INFORMATION:

* a. Legal Name: <input type="text" value="City of Jackson"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="38-60047401"/>	* c. Organizational DUNS: <input type="text" value="0850316560000"/>	

d. Address:

* Street1:	<input type="text" value="161 W Michigan Ave"/>
Street2:	<input type="text"/>
* City:	<input type="text" value="Jackson"/>
County/Parish:	<input type="text"/>
* State:	<input type="text" value="MI: Michigan"/>
Province:	<input type="text"/>
* Country:	<input type="text" value="USA: UNITED STATES"/>
* Zip / Postal Code:	<input type="text" value="49201"/>

e. Organizational Unit:

Department Name: <input type="text" value="Neighborhood & Economic Opert."/>	Division Name: <input type="text" value="Neighborhood & Economic Opert."/>
--	--

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

Prefix: <input type="text"/>	* First Name: <input type="text" value="Laurie"/>
Middle Name: <input type="text" value="L."/>	
* Last Name: <input type="text" value="Huff"/>	
Suffix: <input type="text"/>	
Title: <input type="text" value="Grant Coordinator"/>	
Organizational Affiliation: <input type="text"/>	
* Telephone Number: <input type="text" value="517-768-6407"/>	Fax Number: <input type="text" value="1-866-971-2151"/>
* Email: <input type="text" value="lhuff@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 and Urban Development

11. Catalog of Federal Domestic Assistance Number:

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*** 12. Funding Opportunity Number:**

* Title:

HOME: HOME Investment Partnerships Program

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

Attach supporting documents as specified in agency instructions.

Add Attachments

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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="354,874.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="20,000.00"/>
* g. TOTAL	<input type="text" value="374,874.00"/>

*** 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.
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** I AGREE

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Authorized Representative:

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

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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.


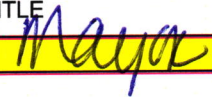
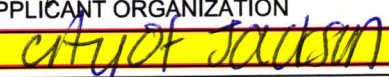
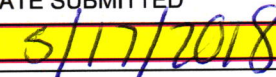
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, 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.
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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.
20. 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 
APPLICANT ORGANIZATION 	DATE SUBMITTED 

Executive Summary

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

Introduction

The City of Jackson presents this One-Year Action plan as the fourth year of its 2015-2019 Five-Year Consolidated Plan and covers the period of July 1, 2018 through June 30, 2019, also referred to as Program Year (PY) 2018 or Fiscal Year (FY) 2018. PY 2018 represents the City's 44th consecutive year to receive Community Development Block Grant (CDBG) formula allocation as an entitlement community and 27th year to receive a HOME Investment Partnerships Program (HOME) formula allocation as a participating jurisdiction.

Summarize the objectives and outcomes identified in the 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. Therefore, the City must concentrate 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 the predominantly residential, low- to moderate-income areas.

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 to owners of downtown buildings to rehabilitate existing upper story housing units and/or convert vacant space into living space for low- to moderate-income citizens, fund a commercial kitchen downtown to provide a low costs means for chefs to grow their businesses, enhance a downtown park, and improve streets that service low- to moderate income residences leading to the downtown. City Council has also allocated funding to provide energy efficient residential properties to income eligible homebuyers using HOME funding in transitional neighborhoods that will assist in the overall goals of affordable housing throughout the City.

Evaluation of past performance

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 on how 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.

Summary of Citizen Participation Process and consultation process

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 can accommodate 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 as means of accommodating those unable to attend to person.

Notice of the public hearing to receive citizen comments on housing and community development needs was published on January 21, 2018, in the *Jackson Citizen Patriot* (local and online paper). The Jackson City Council conducted a public hearing on January 30, 2018 to seek public input on community development and housing needs before writing this Action Plan. A summary of comments received from this public hearing appear in the next section.

Per the Department of Housing and Urban Development (HUD) regulation, a draft Action Plan was released for a 30-day public comment period beginning March 21, 2018. A notice of availability was published in the *Jackson Citizen Patriot* on March 18, 2018 and in *The Jackson Blazer* on March 17, 2018. 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 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>.

Summary of public comments

The City received input from seven (7) citizens at the public hearing held on January 30, 2018. One (1) citizen representing a collation of local community stakeholders (CoC Financial Stability Network) addressed Council in regards to funding public services. Two (2) citizens spoke in support of food security and using vacant lots to build houses with unconventional/low cost materials. Four (4) citizens spoke against the use of funding in the 2017-2018 fiscal year to build a home.

City council also received three (3) comments from citizens at the April 24, 2018 Council meeting which are to be included as part of the 30-day public comment period. Two (2) citizens representing a collation of local community stakeholders (CoC Financial Stability Network) addressed Council in regards to the need for affordable housing, safe streets with adequate lighting, assisting low-income citizens with water service deposits, adequate transportation, access to affordable food, and increased interaction between the City and citizens. One (1) citizen, a member of Jackson Citizens Advisory Council, requested that Council table the final allocations to allow for an extended citizen comment period.

Each citizen that commented at the April 24, 2018 Council meeting also submitted their comments in writing which was distributed to City Council and will be held on file.

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

City Council will continue to allocate a portion of HOME funds towards the Community Housing Development Organization (CHDO) to rehabilitate or construct housing to sell to low and moderate income households. While historically the City has allocated CDBG funding for individual public service needs, due to decreased funding this Action Plan does not address public services. The City will take into advisement all comments received and diligently pursue increased communication between citizens and the City.

Summary

Following Jackson's Overall Economic Stabilization (JOES) program, City Council aligned the limited grant funds received 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:

- Increases code enforcement, such as housing code inspections and citing blight violations, in an effort to improve living conditions, provide sanitary surroundings in neighborhoods, and instill a sense of pride in the community.
- Supports homeownership and downtown affordable through strategic rehabilitation, conversion, and new construction where practical.
- Manages and right-sizes public infrastructure assets.

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

Agency/entity responsible for preparing/administering the Consolidated Plan

Agency Role: Grant Coordinator

Name: Laurie Huff

Department/Agency: Department of Neighborhood & Economic Operations

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 will conduct the balance of programs and projects under written agreements.

Consolidated Plan Public Contact Information

Annual Action Plan
2018-2019

3

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

City of Jackson
Attn: Laurie Huff, Grant Coordinator
161 W Michigan Ave
Jackson MI 49201

517-768-6407
lhuff@cityofjackson.org

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

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.

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

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.

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

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. The programs and services these agencies provide are integral to offering a full spectrum of assistance to the community, especially when coupled with those from the City.

Table 1 – 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 Homelessness Strategy Homeless Needs- Chronically homeless Homeless Needs- Families with children Homelessness Needs- Veterans Homelessness Needs- Unaccompanied youth 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 board 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- Homeless Services- Education Services- Persons with Disabilities Services- Victims of Domestic Violence Services- Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs- Chronically homeless Homeless Needs- Families with children

		Homelessness Needs- Veterans Homelessness Needs- Unaccompanied youth 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 Needs Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation via email and in group setting to determine needs of the disabled population.

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

A variety of additional consultations were solicited on a limited basis, such as with City 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.

Table 2 – Other local/ regional/ federal planning efforts

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 administers both public housing units in Jackson as well as 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	In the process of revision, the City of Jackson will continue to affirmatively further fair housing and will address identified barriers to fair housing choice to the extent feasible.
Overall Economic Stabilization Program	City of Jackson	City leaders closely follow the goals, visions, and strategies identified in this plan to improve Jackson's economy.
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.

Narrative (optional)

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)

**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 risks and remediation in the City of Jackson. Additionally, the City and State of Michigan continue partnering on place making activities, including a major reconstruction of Michigan Avenue, converting the downtown loop from one-way to two-way traffic, and demolition of blighted residential structures.

Citizen Participation Outreach

Table 3 – 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 held on January 30, 2018	Community	None	One citizen commented on public services, Two citizens spoke in support of food security and using vacant lots to build houses Four citizens spoke against the use of funding in the 2017-2018 fiscal year.	n/a	n/a

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)
2	City Council April 24, 2018	Community	None	Two (2) citizens representing a collation of local community stakeholders (CoC Financial Stability Network) addressed Council in regards to the need for affordable housing, safe streets with adequate lighting, assisting low-income citizens with water service deposits, adequate transportation, access to affordable food, and increased interaction between the City and citizens.	n/a	n/a
3	City Council April 24, 2018	Community	None	One citizen requested that Council table the final allocations to allow for an extended citizen comment period.	n/a	n/a
4	Email	Community	None	The three citizens that provided comments at the City Council meeting also submitted their comments in writing.	n/a	n/a

Expected Resources

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

Priority Table

Table 4 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources : \$	Total: \$		
CDBG	Public-Federal	Admin and Planning, Economic Development, Housing, Public Improvement,	\$1,210,009	\$69,250	\$698,102	\$1,977,361	*\$1,096,298	*The expected amount available reflects a 3% expected decrease in funding throughout the 5 year con-plan as well as program income
HOME	Public-Federal	Acquisition, Homebuyer Assistance, Homeowner Rehabilitation , Multifamily rehabilitation	\$354,874	\$20,000	\$214,750	\$589,624	*308,882	*The expected amount available reflects a 3% expected decrease in funding throughout the 5 year con-plan as well as program income

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 means 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.

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 continues to acquire tax reverted parcels in strategic areas to provide for future commercial or residential redevelopment opportunities.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Table 5 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	CDBG Administration/ Planning & HOME Administration	2018	2019	Admin/Planning	Administration of program	CDBG: \$81,102 HOME: \$28,000	Administration of program, construction engineering for street project
2	Residential Rehabilitation	2018	2019	Affordable Housing	Rehabilitation	CDBG: \$226,635 HOME: \$161,290	Assist homeowners through emergency hazard repairs and rehabilitation: 7 Owner-occupied Housing Units
3	Public Facilities and Infrastructure Improvements: Jackson Culinary	2018	2019	Non-Housing Community Development	Community, Neighborhood & Economic Development	CDBG: \$450,000	Construction of incubator kitchen activity other than Low/Moderate Income Housing Benefit: 20,125

	Incubator Kitchen						
4	Code Enforcement- legal services	2018	2019	Non-Housing Community Development	Code Enforcement- legal services	CDBG: \$30,000	Housing Code Enforcement- City Attorney: 300 Housing Units
5	Public Facilities and Infrastructure Improvements	2018	2019	Non-Housing Community Development	Public Facilities and Infrastructure Improvements	CDBG: \$491,522	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit, Slum Blight Spot
6	Acquisition /Rehabilitation/Resale	2018	2019	Affordable Housing	CHDO Reserve	HOME: \$175,584	Direct Financial Assistance to Homebuyers: 1 Household assisted

Goal Descriptions

Table 6 – 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	Residential Rehabilitation
	Goal Description	HOME funds will be utilized to provide rehabilitation loans to low-income homeowners to bring properties up to code. CDBG funds will support the City’s Emergency Hazard Program in which low-income homeowners facing an emergency situation affecting the health, safety, and livability of the home will receive loans to immediately remediate the emergency situation, such as a leaking roof, sewer backup, or a non-working furnace.
3	Goal Name	Public Facilities: Jackson Culinary Incubator Kitchen

	Goal Description	Located within a predominantly low-moderate income area, funds will be used for construction of a commercial kitchen in a City owned building (135 W. Cortland St. Jackson, MI 49201). In combination with the marketplace and Festival Kitchen with seating, the project will provide a low cost means for skilled and low skilled chefs to grow their business within the City of Jackson. Funds will provide the space for in home businesses to hone their skills as well as mass produce and sell products presently limited by their home kitchen.
4	Goal Name	Code Enforcement-Legal Services
	Goal Description	The City Attorney's Office provides legal services for various code enforcement activities including ordinance prosecution (Housing Code and blight elimination), and contract review and approval.
5	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	Construction costs for two (2_ street reconstruction projects: <ul style="list-style-type: none"> ▪ Steward: Wildwood to VanBuren ▪ Homecrest: Louis Glick to VanBuren Design and Construction costs for: <ul style="list-style-type: none"> ▪ Second St: Washington to Washington NW Bucky Harris Park improvements <ul style="list-style-type: none"> ▪ Additional seating and improved functionality
6	Goal Name	CHDO Reserve
	Goal Description	CHDO direct financial assistance to homebuyers through rehabilitation or construction of up to three (3) residential structures to sell to low-income homebuyer

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

The City of Jackson does not initially anticipate providing HOME-assisted rental housing during the 2018-2019 program year; however, a review of CHDO-eligible activities may incorporate the construction of new rental housing if determined viable. The City intends to assist five low- and moderate-income homeowners through the sale of newly constructed or rehabilitated affordable housing.

AP-35 Projects – 91.220(d)

Introduction

HUD has allocated \$1,210,009 in CDBG funds and \$354,874 in HOME funds to the City. Combined with the \$69,250 in anticipated CDBG program income as well as \$20,000 in HOME program income, the 2018-2019 budget is established at \$1,279,259 in CDBG funding and \$374,874 in HOME funding. The City’s CDBG program anticipates that no less than 70% of the grant funding will be used for activities that provide a benefit to low- and moderate-income persons. Due to decreased funding, the City will utilize the 2018-2019 HOME allocation of \$161,290 to service two (2) residential rehabilitation and \$175,584 to construct or rehabilitate a CHDO residential project.

As set in the draft of this plan, the City will utilize a contingency plan in which any modifications from the estimated funding released in the draft plan as allocated from HUD will result in alterations from CDBG Emergency Hazard funding and HOME Homeowner Rehabilitation funding.

Table 7 – Project Information

#	Project Name
1	CDBG Administration/Planning
2	Residential Rehabilitation- Emergency Hazard
3	Public Facilities: Jackson Culinary Incubator Kitchen
4	Code Enforcement-Legal Services
5	Street Reconstruction- Steward: Wildwood to VanBuren
6	Street Reconstruction- Homecrest: Louis Glick to VanBuren
7	Street Construction & Design- Second St: Washington Ave to Washington NW
8	Parks, Recreation & Grounds- Bucky Harris Park Improvements
9	Administration- HOME
10	Homeowner Rehabilitation-HOME
11	CHDO Reserve/Operating

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

The Jackson City Council allocated funding described above to align with its adopted JOES program goals, visions, and strategies. The City believes the greatest return for both public and private investment will result from concentrating the CDBG allocation to improve and upgrade public infrastructure, revitalize neighborhoods, while combining both CDBG and HOME funds to improve residential living conditions.

Projects

AP-38 Projects Summary

Project Summary Information

Table 8 – Project Summary

1	Project Name	CDBG Administration/ Planning
	Goals Supported	CDBG Administration/ Planning
	Needs Addressed	CDBG Administration/ Planning
	Funding	CDBG: \$81,102
	Description	Staff and related costs required for overall program management, planning, coordination, monitoring, reporting, and evaluation.
	Target Date	06/30/2019
	Estimate the number of 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 and fourth 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	Residential Rehabilitation- Emergency Hazard (CDBG)
	Goals Supported	Residential Rehabilitation
	Needs Addressed	Rehabilitation
	Funding	CDBG: \$226,635
	Description	Staff and related costs required for rehabilitation activities including emergency hazard rehabilitation, oversight of residential construction projects, enforcement, and loans.
	Target Date	06/30/2019

	Estimate the number of type of families that will benefit from the proposed activities	15 families
	Location Description	Administration of this program will be conducted by the City's Department of Neighborhood & Economic Operations staff, located on the third floor of City Hall, 161 West Michigan Avenue, Jackson, MI 49201. Location of assistance is to be determined.
	Planned Activities	Assist low income families with hazard remediation to homeowner occupied dwellings.
3	Project Name	Code Enforcement-legal services
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$30,000
	Description	The City Attorney's Office provides legal services for various code enforcement activities including ordinance prosecution (Housing Code and blight elimination), contract review, and approval.
	Target Date	06/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	Approximately three hundred (300) code enforcement cases of occupied housing units in low-to moderate-income areas will be issued to properties violating garbage, vehicle, zoning, and noxious weed ordinances.
	Location Description	Administration of this program will be conducted by the City's Attorney's office, located on the twelfth floor of City Hall, 161 West Michigan Avenue, 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 authorize issuance of code enforcement actions of CDBG eligible cases.</p>

4	Project Name	Public Facilities: Jackson Culinary Incubator Kitchen
	Goals Supported	Community, neighborhood, and Economic Development
	Needs Addressed	Community, neighborhood, and Economic Development
	Funding	CDBG: \$450,000
	Description	Construction of a commercial kitchen to provide future economic opportunity activities
	Target Date	06/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	
	Location Description	135 W Cortland St, Jackson, MI 49201
	Planned Activities	Jackson Culinary Incubator Kitchen will provide a low cost means for skilled and low skilled chefs to grow their business within the City of Jackson.
5	Project Name	Street Reconstruction- Steward St from Wildwood to VanBuren (Construction only)
	Goals Supported	Public Facilities and infrastructure improvements
	Needs Addressed	Public Facilities and infrastructure improvements
	Funding	CDBG: \$171,000
	Description	Reconstruction of Steward St from Wildwood to VanBuren (construction only)
	Target Date	06/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	Two Thousand Six Hundred (2,600) low/mod residents
	Location Description	Census Tract 6, Tract 5

	Planned Activities	Mill and resurface road pavement. Install low-level decorative streetlights along both sides of Steward Street throughout the project area.
6	Project Name	Street Reconstruction- Homecrest from Louis Glick to VanBuren (construction only)
	Goals Supported	Public Facilities and infrastructure improvements
	Needs Addressed	Public Facilities and infrastructure improvements
	Funding	CDBG: \$72,600
	Description	Reconstruction of Homecrest from Louis Glick to VanBuren (engineering only)
	Target Date	06/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	One Thousand One Hundred (1,100) low/mod residents
	Location Description	Census Tract 6
	Planned Activities	Mill and resurface road pavement. Install low-level decorative streetlights at the intersection of Louis Glick and Homecrest.
7	Project Name	Street Reconstruction- Second St from Washington Ave to Washington NW
	Goals Supported	Public Facilities and infrastructure improvements
	Needs Addressed	Public Facilities and infrastructure improvements
	Funding	CDBG: \$167,922
	Description	Street Reconstruction- Second St from Washington Ave to Washington NW (Design & Construction)
	Target Date	06/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	Three Thousand Two Hundred Seventy (3,270) low/mod residents

	Location Description	Census Tract 9, Area 28 & Area 35
	Planned Activities	Reconstruct the road at 25 foot wide, new curb, gutter, and pavement. A total of 0.08 miles of street will be resurfaced.
8	Project Name	Parks & Recreation- Bucky Harris Park Improvements
	Goals Supported	Public Facilities and infrastructure improvements
	Needs Addressed	Public Facilities and infrastructure improvements
	Funding	CDBG: \$80,000
	Description	Improve Bucky Harris Park to better compliment Horace Blackman Park
	Target Date	06/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	One Thousand One Hundred (1,100) low- to moderate-income residents
	Location Description	Northeast corner of West Michigan Avenue and South Jackson Street in Census Tract 6
	Planned Activities	Improve Bucky Harris Park to better complement the newly renovated Horace Blackman Park
9	Project Name	Administration-HOME
	Goals Supported	HOME- Administration
	Needs Addressed	HOME- Administration
	Funding	HOME: \$28,000
	Description	Staff and related costs required for overall program management
	Target Date	06/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	Not applicable for this activity.
	Location Description	Staff from the City's Department of Neighborhood & Economic Operations will be responsible for administering the HOME grant

		funds. Staff offices are located on the third floor of City Hall, 161 West Michigan Avenue, Jackson, MI 49201.
	Planned Activities	Overall program management.
10	Project Name	Residential Rehabilitation-HOME
	Goals Supported	Residential Rehabilitation
	Needs Addressed	Rehabilitation
	Funding	HOME: \$161,290
	Description	Provision of no interest, low payment loans to bring a residential property up to housing code.
	Target Date	6/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	Two (2) low-income families
	Location Description	Specific sites to receive rehabilitation assistance will be identified throughout the program grant year.
	Planned Activities	Provide no interest, low payment 20-year loans to low-income homeowners to provide decent, safe, and sanitary living conditions as prescribed in the City's Housing Maintenance Code.
11	Project Name	CHDO Reserve
	Goals Supported	New Construction/Rehabilitation
	Needs Addressed	CHDO Reserve
	Funding	HOME: \$175,584
	Description	Utilized for set aside no less than 15% of the City's 2018-2019 HOME allocation to a CHDO- eligible activity.
	Target Date	06/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	Up to Three (3) low-moderate income housing

	Location Description	To be determined
	Planned Activities	Construct or rehabilitate up to three (3) residential homes. For eventual sale to an income eligible homebuyer.
12	Project Name	CHDO- Operating
	Goals Supported	CHDO project administration
	Needs Addressed	CHDO project administration
	Funding	HOME: \$10,000
	Description	Utilized for CHDO operating expenses no more than 5% of the City's 2018-2019 HOME allocation to a CHDO-eligible activity.
	Target Date	06/30/2019
	Estimate the number of type of families that will benefit from the proposed activities	Up to three (3) low-moderate income veteran housing
	Location Description	Community Action Agency, (Current City CHDO) with an office located at 1214 Greenwood Ave Jackson, MI 49203.
	Planned Activities	Administer the construction of new or rehabilitated residential units for eventual sale to an income eligible homebuyer.

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 recently adopted 2016 Master Plan. Funding will be allocated to address improvement to the downtown and immediately adjacent neighborhoods. Projects include Second St, Steward Ave, and Homecrest Street reconstruction, rehabilitation, code enforcement, downtown park improvement, kitchen/market incubator.

Rationale for the priorities for allocating investments geographically

With the exception of projects that require income eligibility, all activities will be conducted within HUD identified CDBG eligible areas of the City. Continued funding will be allocated to downtown park improvements as the downtown is the City's most vital neighborhood and serves as the community

commons. Through the surge of recent development, the downtown offers a rich array of choice in commerce, entertainment, business, housing, and transportation. The most recent Target Market Analysis (2014), found that there is the potential annual need for 270 new dwelling units in the downtown, including 97 in the downtown core. City Council will allocate funding for rehabilitation of residential dwellings in both CDBG and HOME. As found by the Master Plan, the revitalization of the neighborhoods immediately north of downtown, including Bennett, Arts, Loomis, and Nixon, will offer a desirable residential setting to support new job growth in the downtown.

Affordable Housing

AP-55 Affordable Housing – 91.220(q)

Introduction

The City of Jackson will utilize its CDBG and HOME funds to rehabilitate existing residential units for income-qualified individuals or families. Partnering with Community Action Agency (CAA) as the City of Jackson’s CHDO, up to three (3) houses will be constructed/rehabilitated to service veterans. The following section indicates the City’s one (1) year affordable housing goals.

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

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	10
Special-Needs	0
Total	10

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	
The Production of New Units	3

One Year Goals for the Number of Households Supported Through	
Rehab of Existing Units	
Acquisition of Existing Units	17
Total	20

AP-60 Public Housing – 91.220(h)

Introduction

The Jackson Housing Commission (JHC) has been in operation for over 50 years, providing 543 public housing units within three (3) Asset Management Projects (AMP) and administering 475 Housing Choice Vouchers (more commonly referred to as “Section 8”). The AMP locations are 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 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 northern jurisdictional boundary and, although it is over 30 years 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. The CAA also administers over 300 vouchers for the Michigan State Development Authority (MSHDA). Even though the program provides a choice of where to live, the highest voucher concentrations within the City are in Census Tracts 10 and 13, which is also one of the more distressed area 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 2018-2019, the Jackson Housing Commission will focus on integrating 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 a 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 intends to work with community agencies to begin teaching job skills/work readiness workshops, health and nutrition classes, and an on-site HeadStart program.

Introduction

The City of Jackson has neither the facilities nor resources available to provide an impact on homeless and other special needs activities. The Jackson County Continuum of Care (CoC), and its participating public/private agencies receive direct funding from HUD for permanent 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

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

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

While the City of Jackson will not be specifically addressing emergency shelter and transitional needs of homeless persons, it will consider providing assistance on a case-by-case basis when requested to ensure the infrastructure needs of emergency shelters are addressed. Continued inspections of shelters and non-owner occupied housing units by City inspectors will 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 however it focuses on improving the community as a whole.

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 situations 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 however it focuses on improving the community as a whole.

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

Introduction

Approximately half of the housing units in the City of Jackson were built before 1940, and more than three quarters are more than 50 years old, thus presenting an intimidating maintenance and continued homeownership challenge. The 2010 Census homeownership rate was 53%, lower than the national rate of 65%. The recent passing of the updated City of Jackson Master Plan found that there is empirical evidence linking a higher homeownership rate with improved neighborhood conditions; therefore increasing homeownership is a common objective toward the goal of stable, desirable neighborhoods.

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 is committed to the principle that all individuals should have an equal opportunity to access housing choices regardless of their religion, race, color, national origin, sex, age, veteran status, familial status, or physical or mental disability. The City's Fair Housing Ordinance found in Chapter 14, Article IV of the City of Jackson Code of Ordinances, adds an additional protected class above those required under federal law, making it illegal to discriminate based on an individual's legal source of income.

Through regular and frequent housing code inspections, the City promotes and maintains its affordable housing stock, as well as provision of emergency hazard loans to very-low income households. The construction of energy efficient residential dwellings for income eligible homebuyers and eligible activities under HOME program also provides homebuyer assistance.

The City's Master Plan and zoning ordinance (Article 28, City Code of Ordinances) provides for land use and density categories that permit the construction of various types of affordable housing throughout the city and in the downtown. The City will utilize its current Analysis of Impediments to Fair Housing Choice and revisit strategies to remove or ameliorate potential barriers to affordable housing in the Assessment of Fair Housing, which will be completed prior to the next Five (5) year consolidated plan in 2020.

AP-85 Other Actions – 91.220(k)

Introduction

The City of Jackson will take measures to address the other actions listed below as limited financial resources allow.

Actions planned to address obstacles to meeting underserved needs

With the continued reduction in CDBG funding received from HUD, the City is unable to provide public service funding as a direct benefit to address underserved needs. During the allocation process, the City evaluates all projects based up on their impact on the community as a whole. Selection relies heavily on the economic impact of satisfying the previously unmet needs.

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 a hazardous condition 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 stock with new, updated, and energy efficient housing units. The City will utilize HOME funding to construct energy efficient residential dwellings for low-to moderately low-income homebuyers.

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 offices continue to educate property owners and tenants by dispersing lead information packets.

The City was recently awarded \$2,500,000 in Lead Based Paint Hazard Control funding through HUD with a \$400,000 Healthy Homes Supplemental Funding. The grant targets lead hazard control efforts in housing units where children are at the greatest risk of lead poisoning, promoting cost-effective lead hazard control methods, as well as promoting and educating the public on effective lead hazard control and lead-safe work practices.

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 assist its low- and moderate-income residents to ensure they have decent, safe, and sanitary housing options. These services and programs include, but are not limited to, housing and code inspections of non-owner occupied residential properties, emergency hazard loans, construction of energy efficient residential properties, and downtown investor-owned rehabilitation grants.

Actions planned to develop institutional structure

City leaders and staff will continue to participate in developing institutional relationships through direct contact with public, private & faith based agencies, and participating in community-based boards and commissions to remain cognizant of the area's needs.

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

City staff is involved with organizations such as the Continuum of Care to understand homelessness, affordable housing, and social service needs. Active participation on these and other community boards and commissions is conducive to a collaborative and focused effort to meet the community's needs.

The Jackson Housing Commission (JHC) focuses on integrating services to stabilize the tenant base and promote personal and economic self-sufficiency. The JHC employs a full-time on-site case manager to advocate for tenants and connect residents to community resources to help meet their individual needs. The JHC is also forming partnerships with community service agencies and faith-based organizations to provide job skills/work readiness workshops, health and nutrition classes, and an on-site Head-Start program at Shahan-Blackstone North Apartments as well as Chalet Terrace.

Program Specific Requirements

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

Introduction

HUD released the 2018-2019 formula allocations for CDBG and HOME entitlements on May 1, 2018. Jackson will receive \$1,210,009 in CDBG and \$354,874 in HOME funds.

Staff in the City's Department of Neighborhood & Economic Operations are responsible for ensuring compliance with all program-specific rules and regulations, as well as numerous cross-cutting federal regulations that apply to all federal funds. Proper administration of CDBG/HOME funds includes, but is not limited to:

- Receiving applications for funding and reviewing same for eligibility.

- Performing a risk analysis of applicants requesting funds.
- Preparing reports for the City Manager, Mayor, and City Council.
- Performing environmental reviews.
- Preparing the Five (5) Year Consolidated Plan, One (1) Year Action Plan, and Analysis of Impediments for submission to HUD, as required.
- Preparing Written Agreements to those entities receiving an allocation.
- Preparing the CAPER.
- Monitoring subrecipients: quarterly desk review and annual on-site reviews.
- Conducting site visits to projects while in progress.
- Conducting Davis-Bacon interviews on construction sites for Labor Standards compliance.
- Maintaining files and records relating to the overall administration of the programs.
- Reviewing payment request for accuracy and eligibility.
- Reconciling financial records with IDIS.
- Preparing and reconciling reports submitted with the CAPER.
- Preparing Federal Cash Control Reports.
- Ensuring accuracy of data entered into IDIS.
- Preparing budgets and forecasts.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects projected to utilize CDBG funds during the coming year are identified in the Projects Table. The following identifies program income that is available for use in carrying out these projects.

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

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

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

The City does not anticipate using HOME funds for other forms of investment not already described in 24 CFR 92.205(b).

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 property during the period of affordability using the following recapture options:

- 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.
- 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.

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 may be used for any HOME-eligible activity. The homeowner will receive a fair 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:

HOME-assisted housing must meet the affordability requirements for not less than the applicable period as specified below, beginning after project completion:

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 2018-2019 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.

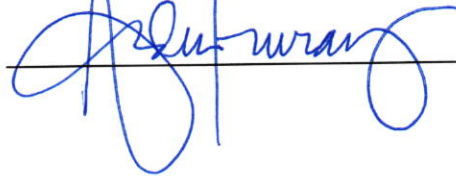
- O. If the participating jurisdiction intends to provide tenant-based rental assistance, the use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's annual approved housing strategy for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

* * * *

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

I, ANDREA MURRAY, 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 10th day of May, 2017.

IN WITNESS WHEREOF, I have hereto affixed my signature and the Seal of the City of Jackson, Michigan, on the 11th day of May, 2017.



Clerk



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;

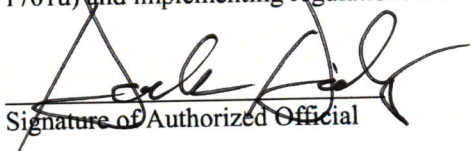
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this 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

8/17/18
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) 2018-2019 [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.

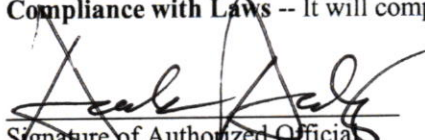
Excessive Force -- It has adopted and is enforcing:

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

5/17/18

Date

Mayor

Title

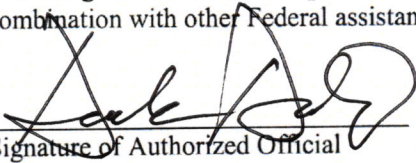
Specific HOME Certifications

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

5/17/18
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.

- Less than \$15,000 HOME investment per unit= 5 years affordability
- \$15,000 to \$40,000 HOME investment per unit= 10 years affordability
- More than \$40,000 HOME investment per unit= 15 years affordability
- New construction of rental housing= 20 years affordability
- Refinancing of rental housing= 15 years affordability

Throughout the affordability period, HOME-assisted housing must be occupied by income-eligible households. If a home purchased with HOME assistance is sold during the affordability period, the resale/recapture provisions identified above will apply to ensure continued provision of affordable homeownership. The homeowner will receive a fair 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. If any rental housing receives HOME-assistance, which is not currently planned, when units become vacant, subsequent tenants must be income-eligible and charged the applicable HOME rent.

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:

The City of Jackson will not be utilizing HOME funds to refinance debt secured by multi-family housing.