



**BENTON HARBOR**  
*Port of Opportunities*

**2019 Annual Action Plan**

**DRAFT**

**CARES Amendment (CV Reallocation)**

City of Benton Harbor  
200 E. Wall Street  
Benton Harbor, MI 40922

Annual Action Plan  
2019

1

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-Amended to include CARES Act funds. To reprogram \$165,000 CDBG funds. -8/10/2021 Plan amended to include CV-1 and CV-#3 \$328,823 funding and activities.-A final CARES Amendment was made to reallocated funds from CV Rental Assistance to PPE distribution under the CDBG-CV Public Services project in January 2022. **-CARES Amendment to reallocate unused CV public service funds to other CV public services and the CDBG-CV Housing Rehab program.**

## Executive Summary

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

#### 1. Introduction

The City of Benton Harbor, Michigan is an entitlement recipient of Community Development Block Grant (CDBG) funding only. This Action Plan addresses the priority needs for Program Year 2019. The City of Benton Harbor is located in Southwestern Michigan, in Berrien County, forty-five (45) miles west of Kalamazoo. The County's southern border is the Michigan/Indiana state line, making Benton Harbor forty-one (41) miles north of South Bend, Indiana. Benton Harbor has a total land area of 4.68 square miles and is bordered by the Paw Paw and St. Joseph Rivers, which merge and empty out into Lake Michigan just downstream from Benton Harbor. Benton Harbor is located across the Saint Joseph river from the city of Saint Joseph, and are locally known as the "Twin Cities". Though, the cities could not be more different. According to the U.S. Census 2017 estimates, the population of Benton Harbor is 9,860. Of the total population, 85.3% are African American and 9.9% are White. Saint Joseph's 2017 population was 8,363, with 86.6% of the population identifying as White and 5.5% African American. In 2017, Benton Harbor's median household income was \$18,962, with 49.2% of residents living in poverty, while Saint Joseph's median household income was \$55,854, with 8.2% living in poverty. The City has historically been home to industrial and manufacturing companies and suppliers, such as Whirlpool Corporation, which is headquartered in Benton Harbor, which is significant because as manufacturing and industry left many American cities, Benton Harbor was no different. This has had devastating economic, social, cultural, and environmental impacts on Benton Harbor.

Many years of financial mismanagement left the city in financial distress. In 2010, the State of Michigan appointed the first of two emergency financial managers to help the city become financially solvent. As part of the emergency financial management plan for Benton Harbor, a large number of city employees were terminated as a cost savings measure, reducing city staff from over 100 employees to 40 employees. Salaries were also reduced and many city benefits were terminated. During this time, the city's Community & Economic Development Department (CEDD), which administers the City's CDBG grant, experienced high rates of turnover and suffered from lack of experience and incompetency. For many years, the City's CDBG program was inadequately administered and/or not administered at all. All of this led to an unsatisfactory HUD monitoring visit in 2016 that cited numerous findings, non-compliance with HUD reporting requirements, and a severe backlog in CDBG funding. As of May

2019, timeliness was met for the City of Benton Harbor, placing the community back on track to receive and successfully facilitate HUD Community Block Grant Dollars.

### **CARES Act Amendment (CV1 & CV3)**

On March 27, 2020 the Federal Coronavirus Aid, Relief and Economic Security Act (CARES) was signed into law to assist communities in their efforts to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic. The CARES Act included supplemental formula allocations to HUD's CPD programs, including CDBG-CV for the City of Benton Harbor. CDBG-CV funds were awarded in two rounds to the City with funds of \$250,905 from CDBG-CV1 funds of \$77,918 from CDBG-CV3. The total funding from CDBG-CV1 and CDBG-CV3 is \$328,823.

### **CARES Act Amendment (PPE Distribution)**

Based on increased COVID-19 transmission rates the City has identified a need for personal protective equipment (PPE) to minimize exposure to the coronavirus. To address this need, the City will reallocate \$50,000 from CV Rental Assistance to PPE distribution under the CDBG-CV Public Services project. The City will use PPE supplies in collaboration with other programs within the City.

Amendment updates are located in sections:

ES-05 Executive Summary: Introduction and Citizen Participation

AP-12 Citizen Participation: Updated with new public comment period and public hearing

AP-35/38 Projects: Updated planned activity allocation and outcome estimates for project #8: CDBG-CV Public Services. Replaced planned activity CV Rental Assistance to PPE distribution.

### **CARES Act Amendment (CDBG-CV Reallocation of Funds)**

The City will reallocate \$60,000 in unspent CDBG-CV funds previously allocated to the activity CV Shelter Operations within the CDBG-CV-Public Services project towards other CV public services and the CDBG-CV Housing Rehab program.

Amendment updates are located in sections:

ES-05 Executive Summary: Updated the introduction and Citizen Participation.

AP-12 Citizen Participation: Updated with new public comment period and public hearing.

AP-20 Goals: Reallocate CDBG-CV funds from the public services goal to the housing rehab goal.

AP-35/38 Projects: Updated planned activity allocation for CDBG-CV Public Services and CDBG-Housing Rehab. The total allocation for each of these projects has also been updated.

## **2. Summarize the objectives and outcomes identified in the Plan**

The objective of the FY 2019 Action Plan largely focuses on improving the community's physical and community infrastructure needs.

## **3. Evaluation of past performance**

Many years of financial mismanagement left the city in financial distress. In 2010, the State of Michigan appointed the first of two emergency financial managers to help the city become financially solvent. As part of the emergency financial management plan for Benton Harbor, a large number of city employees were terminated as a cost savings measure, reducing city staff from over 100 employees to 40 employees. Salaries were also reduced and many city benefits were terminated. During this time, the city's Community & Economic Development Department (CEDD), which administers the City's CDBG grant, experienced high rates of turnover and suffered from lack of experience and incompetency. For many years, the City's CDBG program was inadequately administered and/or not administered at all. All of this led to an unsatisfactory HUD monitoring visit in 2016 that cited numerous findings, non-compliance with HUD reporting requirements, and a severe backlog in CDBG funding. The City failed to meet timeliness requirements in 2017 and 2018, putting the City's FY 2018 funds in jeopardy. As a result, the City was required to consult with HUD headquarters in June 2018. As of May 2019, timeliness was met for the City of Benton Harbor, placing the community back on track to receive and successfully facilitate HUD Community Block Grant Dollars.

In response to a recommendation from the City's HUD field representative, the City's FY 2019 Annual Action Plan identifies strategies that focus on funding shovel-ready, infrastructure projects that can spend down funds in a timely manner.

## **4. Summary of Citizen Participation Process and consultation process**

City staff conducted public outreach through publishing public notices in the Herald-Palladium newspaper and holding two (2) public hearings. During the review period, the draft Action Plan was available for review at the Community & Economic Development Department.

### **CARES Act Amendment (CV1 & CV3):**

CDBG-CV funds were awarded in two rounds to the City with funds of \$250,905 from CDBG-CV1 funds of \$77,918 from CDBG-CV3. Under the provision of the CARES Act, a notice and five (5) day comment period consistent with the loosening of procedures providing a waiver of the 30 day comment period in order to program the funding quickly and efficiently.

A public notice was published in the Herald Palladium on July 29, 2021 that there would be a 5-day public review period. The public comment period was held from July 29, 2021 to August 4, 2021. The CV3 amendment was posted on the City website and at the Benton Harbor Public Library as well as City Hall, 200 E. Wall Street, Benton Harbor, MI. Written comments could be submitted to CEDD at the address above. There were no comments made from the public.

A public notice was published in the Herald Palladium on June 26, 2021 that there would be a public hearing at the Benton Harbor City Commission on July 6, 2021 to discuss the CV3 amendment. A summary of comments is written in the following summary of public comments and in the AP-12. The meeting minutes are attached in the AD-26 citizen participation attachment.

**CARES Act Amendment (PPE Distribution):**

A 5-day public comment period was held to allow for the public to review and make comments on the draft amendment. The public comment period was held from January 3, 2022 to January 7, 2022. The CV PPE Amendment was posted on the City website at <https://bhcity.us/community-economic-development/> and at the Benton Harbor Public Library as well as CEDD, City Hall, 200 E. Wall Street, Benton Harbor, MI. Written comments could be submitted to CEDD at the address above.

*There were no comments made from the public during the public comment period.*

The City Commission held a public hearing to review the draft CV PPE Amendment on January 19, 2022 at 5:30 PM. City Finance and Recreation Committee meetings are held at City Hall, 200 E. Wall Street, Benton Harbor, MI in the Commission Chamber. The following comments were made from the public at the public hearing:

- *There was a comment made to give residents the opportunity for jobs and apprenticeships. Every time a dime is spent, it should be looked at through the eyes of an African American.*
- *There was a comment about hearing for the past 20 years the unfairness and everything as it relates to the block grant dollars. There should be training offered somewhere in the community.*
- *There was a comment from a citizen to be considered for work with the youth and clean-up of the lakefront this year.*
- *There was a comment about seeing tax dollars be put into a fund for recreation for people of color.*

## **CARES Act Amendment (CDBG-CV Reallocation of Funds)**

Under the provision of the CARES Act, a 5-day public comment period was held to allow for the public to review and make comments on the draft amendment to reallocated CV funds. The public comment period was held from **December 23, 2022** to **December 28, 2022**. The CV Reallocation Amendment was posted on the City website at <https://bhcity.us/community-economic-development/> and at the Benton Harbor Public Library as well as CEDD, City Hall, 200 E. Wall Street, Benton Harbor, MI. Written comments could be submitted to CEDD at the address above.

The City Commission held a public hearing to review the draft CV Reallocation Amendment on **December 28, 2022** at **5:30 PM**. City Commission meetings are held at City Hall, 200 E. Wall Street, Benton Harbor, MI in the Commission Chamber.

A summary of comments will be included before the submission of the reallocation amendment to the 2019 AAP CARES Act Amendment document.

### **5. Summary of public comments**

SEE CITIZENS COMMENTS IN APPENDIX

#### **CARES Act Amendment (CV1 & CV3):**

Public Comment Period: There were no comments received from the public.

City Commission Meeting to Review the Plan: The Benton Harbor City Commission had comments on the draft 2019 AAP CV3 Amendment. The following is a summary of comments.

- There was a comment from the Commission that the City lacked the admin capabilities to address the duplication of benefits. Opposition to funding for admin and other agencies such as the shelter that already receives funding from other sources.
- The Mayor made a comment that federal funds have to be approved, and that they have eligible activities and addressing homelessness is a major part. Funding is strategically given for the lowest of incomes.
- There was a comment on funds allocated to shelter services and if City is helping to fund then it should have a say on how citizens are being treated with them,
- There was a comment about homeless needing services but some funded shelters mistreat them. Monies should be used solely on city residents. There was opposition to give these agencies more money when issues are not being resolved.

- There was one comment from the public. It was asked if the homeless will be assisted with job trades, opportunities and/or education.

- The Mayor commented that the coronavirus funding is a one-time funding from HUD aimed at helping the most vulnerable and disadvantaged in Benton Harbor.

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

The City did not refuse any comments or views.

## **7. Summary**

### **CARES Act Amendment (CV1 & CV3)**

CARES Act funds allocated to entitlement grantees came in three rounds, of which the City received Round 1 & Round 3 grants for CDBG-CV:

Round 1: \$250,905 for CDBG-CV1

Round 2: \$0

Round 3: \$77,918 for CDBG-CV3

This AAP has been amended to reflect the addition of CDBG-CV funds. Funds will be used towards senior services, subsistence payments for rent and utility costs, meal services for isolated persons during the pandemic, shelter operations to vulnerable homeless persons, a food bank, and housing rehab in response to the pandemic. Total funding from CDBG-CV1 and CDBG-CV3 is a combined \$328,823.



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

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	BENTON HARBOR	Community & Economic Development Department

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Table 1 – Responsible Agencies

### Narrative (optional)

The Community & Economic Development Department is the lead entity responsible for administering the City's CDBG programs covered by the Consolidated Plan and Annual Action Plan. The City works with the Southwest Michigan Community Action Agency (SMCAA) as a subrecipient, in administering the City's home rehabilitation loan program.

### Consolidated Plan Public Contact Information

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Director of Community and Economic Development  
City of Benton Harbor  
(269) 204-2776  
City Hall  
200 E. Wall Street  
Benton Harbor, MI 40922

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

### **1. Introduction**

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

The goal of the City of Benton Harbor's Community & Economic Development Department (CEDD) to work toward developing relationships with local services providers where none currently exist, and to strengthen existing relationships. Due to the extensive amount of staff turnover in the CEDD over the past several years, the City lost focus of its citizen participation plan and process, including engaging with local services providers, governments and governmental agencies, and housing providers.

The new CEDD staff has made it a priority to focus on enhancing coordination between the City and these entities, by attending meetings, through phone calls, and emails. Staff has also begun compiling a list of all relevant agencies and entities with the goal of increasing communication beginning with PY 2019, including sending out a survey on unmet community needs, as well as notices for public participation opportunities during the consolidated planning, action plan, CAPER planning and review processes.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The new CEDD director just recently began developing a relationship with the Continuum of Care, the Housing Resource Network. The director has begun attending the HRN monthly meetings in attempt to gain a better understanding of the unmet needs in the community and the services that are currently addressing them.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City of Benton Harbor does not receive ESG funds. Through the newly reestablished relationship with the Housing Resource Network, the City will work with the group to develop funding, policies and procedures for the operation and administration of HMIS in the future.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Southwest Michigan Community Action Agency
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City held multiple discussions with SMCAA staff regarding the home rehabilitation needs in the community, providing City staff with in depth insight into unmet housing needs and lead-based paint issues in the community. This information has helped to guide the direction of the City's CDBG-funded home rehabilitation loan program.
2	<b>Agency/Group/Organization</b>	Berrien County Land Bank
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City works closely with the Berrien County Land Bank to develop a list of vacant properties in the city, and to identify vacant properties that have economic development potential.
3	<b>Agency/Group/Organization</b>	Benton Harbor Housing Commission
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consults with the Benton Harbor Public Housing Commission to determine the needs of those living in public housing and to determine how the City can play a role in addressing housing needs in the community.

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

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care		

**Table 3 – Other local / regional / federal planning efforts**

## **AP-12 Participation – 91.105, 91.200(c)**

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

The City held the first of two Public Hearings on June 13, 2019, during a special meeting of the Planning and Economic Development Committee. The City observed a 30-day comment period, from June 20, 2019 through July 20, 2019. The City held the second, and final, public hearing on July 24, 2019 during the regular meeting of the Planning and Economic Development Committee. Meeting minutes for both hearings are attached herein, including a summary of comments received.

The City published public hearing notices in the Herald-Palladium newspaper on the following dates: June 2, 2019; and June 30, 2019. Affidavits of publication are attached herein.

#### **CARES Act Amendment (CV1 & CV3):**

CDBG-CV funds were awarded in two rounds to the City with funds of \$250,905 from CDBG-CV1 funds of \$77,918 from CDBG-CV3. Under the provision of the CARES Act, a notice and five (5) day comment period consistent with the loosening of procedures providing a waiver of the 30 day comment period in order to program the funding quickly and efficiently.

A public notice was published in the Herald Palladium on July 29, 2021 that there would be a 5-day public review period. The public comment period was held from July 29, 2021 to August 4, 2021. The CV3 amendment was posted on the City website and at the Benton Harbor Public Library as well as City Hall, 200 E. Wall Street, Benton Harbor, MI. Written comments could be submitted to CEDD at the address above. There were no comments made from the public.

A public notice was published in the Herald Palladium on June 26, 2021 that there would be a public hearing at the Benton Harbor City Commission on July 6, 2021 to discuss the CV3 amendment. A summary of comments is written in the table below.

#### **CARES Act Amendment (PPE):**

See Citizen Participation Outreach table below, sort order: #7 & 8.

**CARES Act Amendment (CDBG-CV Reallocation of Funds)**

See Citizen Participation Outreach table below, sort order: #9 & 10.

### 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	Newspaper Ad	Minorities Non-targeted/ broad community	N/A	SEE ATTACHED	No comments were refused	N/A
2	Public Comment Period	Non-targeted/ broad community	CV3: A 5-day public comment period was held to allow for the public to review and make comments on the draft amendment. The public comment period was held from July 29, 2021 to August 4, 2021. The CV3 amendment was posted on the City website and at the Benton Harbor Public Library as well as City Hall, 200 E. Wall Street, Benton Harbor, MI. Written comments could be submitted to CEDD at the address above.	There were no comments received from the public.	All comments were accepted.	<a href="https://bhcit.us/community-economic-development/">https://bhcit.us/community-economic-development/</a>

3	Public Hearing	Non-targeted/ broad community	The City Commission held a meeting to review the draft CV3 amendment on July 6, 2021.	<p>City Commission Meeting to Review the Plan: The Benton Harbor City Commission had comments on the draft 2019 AAP CV3 Amendment. The following is a summary of comments.</p> <ul style="list-style-type: none"> <li>-There was a comment from the Commission that the City lacked the admin capabilities to address the duplication of benefits. Opposition to funding for admin and other agencies such as the shelter that already receives funding from other sources.</li> <li>-The Mayor made a comment that federal funds have to be approved, and that they have eligible activities and addressing homelessness is a major part. Funding is strategically given for the lowest of incomes.</li> <li>-There was a comment on funds allocated to shelter services and if City is helping to fund then it should have a say on how citizens are being treated with them,</li> <li>-There was a comment about homeless needing services but some funded shelters mistreat them. Monies should be used solely on city residents. There was opposition to give these agencies more money when issues are not being resolved.</li> <li>-There was one comment from the public. It was asked if the homeless will be assisted with job trades, opportunities and/or education.</li> </ul>	All comments were accepted.	N/A
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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)
				-The Mayor commented that the coronavirus funding is a one-time funding from HUD aimed at helping the most vulnerable and disadvantaged in Benton Harbor.		
4	Newspaper Ad	Non-targeted/ broad community	CV3: A public notice was published in the Herald Palladium on July 29, 2021 that there would be a 5-day public review period from July 29, 2021 to August 4, 2021.	There were no comments received from the public.	All comments were accepted.	N/A
5	Newspaper Ad	Non-targeted/ broad community	CV3: A public notice was published in the Herald Palladium on June 26, 2021 that there would be a public hearing at the Benton Harbor City Commission on July 6, 2021 to discuss the CV3 amendment.	See comments above from the Benton Harbor City Commission meeting on July 6, 2021 and attached in the City Commission meeting minutes in the AD-26 citizen participation attachment.	All comments were accepted.	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)
6	Internet Outreach	Non-targeted/ broad community	CV3: The amendment to the plan was posted on the City website on July 29, 2021. A screenshot of the web posting and confirmation of date posting is attached to the citizen participation attachment in the AD-25.	N/A. See line 4 of this table. There were no comments receive from the public.	All comments were accepted.	<a href="https://bhcity.us/community-economic-development/">https://bhcity.us/community-economic-development/</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)
7	Public Comment Period	Non-targeted/ broad community	CV PPE Amendment: A 5-day public comment period was held to allow for the public to review and make comments on the draft amendment. The public comment period was held from January 3, 2022 to January 7, 2022. The CV PPE Amendment was posted on the City website and at the Benton Harbor Public Library as well as City Hall, 200 E. Wall Street, Benton Harbor, MI. Written comments could be submitted to CEDD at the address above.	There were no comments received from the public.	All comments were accepted.	<a href="https://bhcitcity.us/community-economic-development/">https://bhcitcity.us/community-economic-development/</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)
8	Public Hearing	Non-targeted/ broad community	CV PPE Amendment: The City Finance and Recreation Committee held a public hearing to review the draft CV PPE Amendment on January 19, 2022 at 5:30PM.	<p>The following comments were made from the public at the public hearing:</p> <ul style="list-style-type: none"> <li>-There was a comment made to give residents the opportunity for jobs and apprenticeships. Every time a dime is spent, it should be looked at through the eyes of an African American.</li> <li>-There was a comment about hearing for the past 20 years the unfairness and everything as it relates to the block grant dollars. There should be training offered somewhere in the community.</li> <li>-There was a comment from a citizen to be considered for work with the youth and clean-up of the lakefront this year.</li> <li>-There was a comment about seeing tax dollars be put into a fund for recreation for people of color.</li> </ul>	All comments were accepted.	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)
9	Public Comment Period	Non-targeted/ broad community	CDBG-CV Reallocation of Funds: A 5-day public comment period was held from <b>December 25, 2022</b> to <b>December 28, 2022</b> . The CV Reallocation Amendment was posted on the City website at <a href="https://bhcity.us/community-economic-development/">https://bhcity.us/community-economic-development/</a> and at the Benton Harbor Public Library as well as CEDD, City Hall, 200 E. Wall Street, Benton Harbor, MI. Written comments could be submitted to CEDD at the address above.	A summary of comments will be included at the conclusion of the public comment period.	All comments accepted.	<a href="https://bhcity.us/community-economic-development/">https://bhcity.us/community-economic-development/</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)
10	Public Hearing	Non-targeted/ broad community	CDBG-CV Reallocation of Funds: The City Commission held a public hearing to review the draft CV Reallocation Amendment on <b>December 28, 2022 at 5:30 PM</b> . City Commission meetings are held at City Hall, 200 E. Wall Street, Benton Harbor, MI in the Commission Chamber.	A summary of comments will be included after the public hearing.	All comments accepted.	N/A

Table 4 – Citizen Participation Outreach

## Expected Resources

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

#### Introduction

#### CARES Act Amendment (CV1 & CV3)

On March 27, 2020 the Federal Coronavirus Aid, Relief and Economic Security Act (CARES) was signed into law to assist communities in their efforts to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic. The CARES Act included supplemental formula allocations to HUD's CPD programs, including CDBG-CV for the City of Benton Harbor. CDBG-CV funds were awarded in two rounds to the City with funds of \$250,905 from CDBG-CV1 funds of \$77,918 from CDBG-CV3. The total funding from CDBG-CV1 and CDBG-CV3 is \$328,823.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation : \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	421,406	0	165,000	586,406	0	Prior year funds of \$165,000 will address code enforcement and public facility improvements.
Other	public - federal	Admin and Planning Housing Public Services Other	328,823	0	0	328,823	0	CDBG-CV Funds to be used to prevent, prepare for and respond to the Corona Virus.8/10/2021 Added CV-3 funds of \$77,918 for a total CV grant

**Table 1 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The City will use \$95,000 of CDBG funds to leverage funding from the City of Benton Harbor's newly enacted City Income Tax, to provide infrastructure improvements in the community. The City will use CDBG funds reserved for its home rehabilitation loan program to leverage funding from the Southwest Michigan Community Action Agency (SMCAA) to weatherize homes in the program.



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

N/A

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Assist Home Owners with Needed Repairs	2016	2020	Affordable Housing		Providing Suitable Living Environments	CDBG: \$87,125 CDBG-CV: \$176,875	Homeowner Housing Rehabilitated: 19 Household Housing Unit
2	Reduce Hazards in Homes	2016	2020	Affordable Housing		Providing Suitable Living Environments	CDBG: \$204,281	Homeowner Housing Rehabilitated: 4 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 1000 Household Housing Unit
3	Improve Public Facilities & Infrastructure	2016	2020	Non-Housing Community Development		Providing Suitable Living Environments	CDBG: \$295,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
4	Increase Capacity of Area Service Providers	2016	2020	Non-Housing Community Development		Improving the Capacity of Area Service Providers	CDBG-CV: \$151,949	Public service activities other than Low/Moderate Income Housing Benefit: 420 Persons Assisted

Table 2 – Goals Summary



## Goal Descriptions

1	<b>Goal Name</b>	Assist Home Owners with Needed Repairs
	<b>Goal Description</b>	The City of Benton Harbor will continue to provide for housing rehabilitation through its minor rehabilitation and emergency repairs programs.
2	<b>Goal Name</b>	Reduce Hazards in Homes
	<b>Goal Description</b>	Through the housing rehabilitation programs, the City will continue to provide for improving the safety and accessibility of homes throughout the community. Code enforcement activities will inspect rental housing throughout Benton Harbor for compliance with the City's property maintenance code.
3	<b>Goal Name</b>	Improve Public Facilities & Infrastructure
	<b>Goal Description</b>	The City of Benton Harbor will utilize CDBG funds to improve the availability and accessibility of public facilities and infrastructure. This may include improvements to public buildings, streets and sidewalks, public parks, water and sewer facilities and other publicly owned and operated facilities.
4	<b>Goal Name</b>	Increase Capacity of Area Service Providers
	<b>Goal Description</b>	The City of Benton Harbor will continue to provide support for local housing and community service providers in an effort to expand access to services and opportunities.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The City of Benton Harbor will allocate funding for the 2019 Program Year with a focus on repairing physical infrastructure. The City will allocate \$195,000 toward infrastructure repairs. The City will reserve approximately 20% of its annual allocation for administration of the CDBG grant. No funds will be reserved for public service programming. the City will allocate approximately \$87,125.00 to the Home Rehabilitation Loan Program.

### CARES Act Amendment

CARES Act funds will be allocated to create three CV-projects that will work to prevent, prepare for and respond to COVID-19: CDBG-CV Program Admin, CDBG-CV Public Services and CDBG-CV Housing Rehab. Details of the CDBG-CV projects are located in the following AP-38 Project Summary section.

### CARES Act Amendment (CDBG-CV Reallocation of Funds)

The City will reallocate \$60,000 of CDBG-CV funds from the CDBG-CV Public Services activity Shelter Operations towards other CV public services and the CV-Housing Rehab Program. Details of the substantial amendment are located in the following AP-38 Project Summary section.

### Projects

#	Project Name
1	Planning and Administration
2	Sidewalk Replacement
3	Home Rehabilitation Loan Program
4	Rehousing Project
5	Code Enforcement
6	Public Facilities Improvements
7	CDBG-CV Program Administration
8	CDBG-CV Public Services

#	Project Name
9	CDBG-CV Housing Rehabilitation

**Table 3 - Project Information**

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

In order to continue to meet the City of Benton Harbor's timeliness goal for the 2019 program year, the City will focus on large, infrastructure repair projects and will be unable to reserve funds for public services programming, which tend to spend funds slowly.

**CARES Act Amendment (CDBG-CV Reallocation of Funds)**

The City will address public services and housing rehab for residents impacted by the pandemic. For emergency services, the City will respond to the needs of the elderly with meal delivery services so they can isolate in safety, PPE distribution to minimize the spread of COVID-19 and food bank services to provide additional support for LMI residents. The CV-Housing Rehab program will respond to living conditions (such as mold, lead-based paint, and poor ventilation) associated with more severe coronavirus disease or poorer post-COVID health outcomes. The City will continue to monitor the needs of LMI residents, and will amend the plan as necessary to meet these needs.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Planning and Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Assist Home Owners with Needed Repairs Reduce Hazards in Homes Improve Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Improving Affordable Housing Options Providing Suitable Living Environments
	<b>Funding</b>	CDBG: \$84,281
	<b>Description</b>	Administrative Costs of administering the CDBG program for the City of Benton Harbor
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Administrative Costs of administering the CDBG program for the City of Benton Harbor
2	<b>Project Name</b>	Sidewalk Replacement
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Providing Suitable Living Environments
	<b>Funding</b>	CDBG: \$95,000
	<b>Description</b>	The City will use CDBG funds as leverage for funds levied through a recently enacted citywide income tax to replace local sidewalks.
	<b>Target Date</b>	3/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that over 1,000 low-to-moderate income families will be serviced, as well as businesses and churches owned or operated by low-to-moderate income persons, by the sidewalk repairs that this project will fund.

	<b>Location Description</b>	Various neighborhoods in the City of Benton Harbor, as identified by the City of Benton Harbor Streets Improvement Plan created by Abonmarche. This map is available to Residents via the COBH Website as well as in the City Manager's Office.
	<b>Planned Activities</b>	Replacement/Repair of neighborhood sidewalks.
<b>3</b>	<b>Project Name</b>	Home Rehabilitation Loan Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Assist Home Owners with Needed Repairs Reduce Hazards in Homes
	<b>Needs Addressed</b>	Providing Suitable Living Environments
	<b>Funding</b>	CDBG: \$217,125
	<b>Description</b>	The City will provide 2 Whole House Rehabilitation Loans and 2 Emergency Repair Loans to low-to-moderate income households.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City will provide Emergency Loans up to \$5,000 and Whole House Rehabilitation Loans up to \$25,000 to eligible homeowners to make eligible repairs to their homes. PY 2019 goal is 2 Whole House Rehabilitation Loans and 2 Emergency Repair Loans.
	<b>Location Description</b>	Addresses have not yet been determined. Properties throughout the city of Benton Harbor.
	<b>Planned Activities</b>	Make needed repairs to eligible single-family, homeowner occupied houses.
<b>4</b>	<b>Project Name</b>	Rehousing Project
	<b>Target Area</b>	
	<b>Goals Supported</b>	Assist Home Owners with Needed Repairs
	<b>Needs Addressed</b>	Improving Affordable Housing Options Providing Suitable Living Environments
	<b>Funding</b>	CDBG: \$25,000



	<b>Description</b>	City of Benton Harbor Rehousing Program - \$25,000 Housing relocation and stabilization services and/or short and/or medium term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing in Benton Harbor City limits and achieve stability in that housing. This activity will be administered by the Housing Assistance Resource Agency (HARA).
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Rehabilitated: 4 Household Housing Unit
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	City of Benton Harbor Rehousing Program - \$25,000
5	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	
	<b>Goals Supported</b>	Reduce Hazards in Homes
	<b>Needs Addressed</b>	Providing Suitable Living Environments
	<b>Funding</b>	CDBG: \$65,000
	<b>Description</b>	CDBG funds will be used to cover the cost of one (1) City code enforcement inspector. Inspector will inspect rental housing throughout Benton Harbor for compliance with the City's property maintenance code.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City of Benton Harbor's code enforcement program inspects rental housing throughout the city for violations of the property code. Based on prior program year figures, it is estimated that 1,000 inspections will be completed.
	<b>Location Description</b>	Inspections will occur at residential properties throughout the city of Benton Harbor.
	<b>Planned Activities</b>	Use CDBG funds to fund the salary of one (1) code enforcement inspector.
6	<b>Project Name</b>	Public Facilities Improvements
	<b>Target Area</b>	

	<b>Goals Supported</b>	Improve Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Providing Suitable Living Environments
	<b>Funding</b>	CDBG: \$100,000
	<b>Description</b>	The City will provide funding for public facilities improvements that will be benefit persons in LMI areas.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
	<b>Location Description</b>	The Bobo Brazil Armory is located at 472 Cass St., Benton Harbor.
	<b>Planned Activities</b>	Planned activities include:  Public facility improvements to benefit LMI.  Repair and renovate the Bobo Brazil Armory to a functional status.
7	<b>Project Name</b>	CDBG-CV Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Assist Home Owners with Needed Repairs Increase Capacity of Area Service Providers
	<b>Needs Addressed</b>	Improving Affordable Housing Options Improving the Capacity of Area Service Providers
	<b>Funding</b>	CDBG-CV: \$50,181
	<b>Description</b>	Administration of the CDBG-CV program. Admin will oversee activities that prepare for and respond to the COVID-19 pandemic. Funding for this project comes from:CDBG-CV1: \$50,181
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Administration of the CDBG-CV program.

8	<b>Project Name</b>	CDBG-CV Public Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increase Capacity of Area Service Providers
	<b>Needs Addressed</b>	Improving the Capacity of Area Service Providers
	<b>Funding</b>	CDBG-CV: \$126,858
	<b>Description</b>	Public Services that specifically prepare for, prevent, or respond to the COVID-19 pandemic that are to be funded with the CDBG-CV funds. Funding for this project comes from: CDBG-CV1: \$126,858
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 20 persons to be assisted with senior services. An estimated 300 persons to be assisted with distribution of PPE supplies. An estimated 300 persons with foodbank services.
	<b>Location Description</b>	Citywide eligible.
	<b>Planned Activities</b>	Public service activities include: - Senior Services, Inc. - Senior services that respond to COVID-19 by providing healthy meals (up to 3 months) to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities. (\$31,134) - PPE distribution - Due to rising COVID-19 transmission rates, the City will distribute PPE supplies to LMI persons in collaboration with other local programs that PPR to the pandemic. (\$50,000) - Food Bank - Provider to assist with the purchase of protein products and personal hygiene products in response to COVID-19. (\$45,724)
9	<b>Project Name</b>	CDBG-CV Housing Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Assist Home Owners with Needed Repairs
	<b>Needs Addressed</b>	Improving Affordable Housing Options
	<b>Funding</b>	CDBG-CV: \$151,784

<b>Description</b>	A new program implemented in response to the effects of COVID-19. This project will address living conditions such as mold, lead-based paint, and poor ventilation for residents negatively affected by the pandemic. The City will utilize CDBG-CV funds for forgivable loans for homeowner housing rehab. (CDBG-CV1: \$73,866 CDBG-CV3: \$77,918 Total CDBG-CV: \$151,784)
<b>Target Date</b>	6/30/2022
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Rehabilitated: 15 Household Housing Unit
<b>Location Description</b>	Citywide.
<b>Planned Activities</b>	CV-Housing Rehab Program: \$151,784 Respond to living conditions (such as mold, lead-based paint, and poor ventilation) associated with more severe coronavirus disease or poorer post-COVID health outcomes by providing forgivable loans for rehabilitating homeowner housing to comport with standard building codes and public health advice.

## **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**

According to the U.S. Census 2017 estimates, the population of Benton Harbor is 9,860. Of the total population, 85.3% are African American and 9.9% are White. Saint Joseph's 2017 population was 8,363, with 86.6% of the population identifying as White and 5.5% African American. In 2017, Benton Harbor's median household income was \$18,962, with 49.2% of residents living in poverty, while Saint Joseph's median household income was \$55,854, with 8.2% living in poverty. As a result, the City of Benton Harbor was designated by HUD as a "low-moderate income community". The City concentrates its CDBG funding throughout the City, excluding the Harbor Shores community, a newly constructed, upscale, community located in the city's northwest side, surrounding Jean Clock Park and the Harbor Shores Golf Course.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
NA	NA

**Table 4 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The City of Benton Harbor's neighborhoods and commercial areas have been dismantled by the disappearance of manufacturing, industry, and commerce, and the White flight that followed. Neighborhoods and commercial areas throughout the city are in need of investment. Through the Consolidated Plan process, the City has not decided to concentrate its CDBG investments in any particular area but, instead, chooses to allocate its funds on activities that would seem to benefit the most people.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Benton Harbor reestablished its CDBG home rehabilitation loan program in May 2018. The City provides forgivable loan assistance of up to \$25,000 to eligible homeowners in the city. The City provides this assistance through two (2) loans: (1) an Emergency Repairs Loan, which provides up to \$5,000 to make such urgent repairs as the purchase of a new furnace or hot water heater, weatherization and energy and accessibility improvements, and (2) a Whole House Rehabilitation Loan, which provides forgivable loans over \$5,000 and up to \$25,000 to make such repairs/replacement of doors and windows, roofs, siding, plumbing, electrical or mechanical needs, etc.

#### CARES Act Amendment

Through the CDBG-CV Housing Rehab project, an estimated 15 LMI households will be assisted with housing rehab.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	19
Special-Needs	0
Total	19

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	19
Acquisition of Existing Units	0
Total	19

**Table 7 - One Year Goals for Affordable Housing by Support Type**

## **Discussion**

The City is focusing the majority of its FY 2019 funding on large-scale infrastructure improvement projects. However, the City will continue to fund its newly reestablished home rehabilitation loan program by reserving \$87,125 for the program. The City is currently in a subrecipient relationship with the Southwest Michigan Community Action Agency (SMCAA) to act as a 3rd party administrator of the City's home rehabilitation loan program. In accord with the subrecipient agreement, the City Commission will reevaluate the relationship with SMCAA in June of 2020 and determine whether the City should continue the partnership.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Benton Harbor Housing Commission (BHHC) administers the city's public housing programs. The BHHC administers the Housing Choice Voucher/Section 8 program and the Public Housing rental program. The BHHC owns and operates 370 Public Housing (PH) units and administers 201 Housing Choice Vouchers (HCVs).

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

The BHHC Annual Plan, approved 07/28/17, provides the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming years.

Maximize the number of affordable units available to BHHC within its current resources by:

- Employing effective maintenance and management policies to minimize the number of public housing units off-line.
- Employ effective methodology to help reduce turnover time for vacated public housing units.
- Reduce time it takes to renovate public housing units.
- Maintain or increase HCVP (Section 8) lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction.
- Maintain or increase HCVP (Section 8) lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration.
- Maintain or increase HCVP (Section 8) lease-up rates by effectively screening HCVP (Section 8) applicants to increase owner acceptance of program.
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

Increase the number of affordable housing units by:

- Applying for additional HCVP (Section 8) units should they become available.
- Leverage affordable housing resources in the community through the creation of mixed-finance housing.
- Pursue housing resources other than public housing or HCVP (Section 8) tenant-based assistance.
- Adding project-based vouchers with a site based waiting list and community supportive services initiative to help support the residents of HOPE VI Phase IV Harbor Bluffs Development.
- Build more units, use Youth Build to provide more houses.

Assistance for families at or below 30% AMI.



- Exceed HUD Federal targeting requirements for families at or below 30% AMI in public housing.
- Employ admissions preferences aimed at families with economic hardships.
- Adopt rent policies to support and encourage residents for job readiness and work.

Assistance for families at or below 50% AMI.

- Employ admissions preferences aimed at families who are working.
- Adopt rent policies to support and encourage families to work.

Assistance for the Elderly.

- Apply for special-purpose vouchers targeted to the elderly should they become available.
- Partnership with faith-based organizations

Assistance for families with Disabilities.

- Carry out the modifications needed in public housing based on the Section 504 Needs Assessment for Public Housing.
- Apply for special-purpose vouchers targeted to families with disabilities should they become available.
- Affirmatively market to local non-profit agencies that assist families with disabilities.
- Applying for grants that enable BHHC to establish MOU for supportive services and dedicate space within its development to sustain.
- Program operations and space within the designated development.

Race or Ethnicities with Disproportionate Housing Needs.

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs. Conduct activities to affirmatively further fair housing.
- Counsel HCVP (Section 8) tenants as to locations outside of areas of poverty or minority concentration and assist them to located those units.
- Market the HCVP (Section 8) to owners outside of areas of poverty/minority concentrations.

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

The Resident Advisory Board (RAB) acts as an intermediary between residents and building management. The BHHC coordinates programs for its residents and connects them to organizations that focus on self-sufficiency.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Benton Harbor Housing Commission (BHC) is not designated as "troubled".

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

### **Introduction**

There are a variety of agencies locally whose primary mission is to reach out to homeless person, especially those who are unsheltered, to assess their needs in an effort to match the need with services that can help them. The Balance of State Continuum of Care (MHAAB) is recognized by HUD as the official Continuum of Care (CoC) for the state of Michigan's region Balance of State COC (statewide). The Balance of State is organized by region following the State of Michigan Prosperity Region Map, which is defined by the state's Regional Prosperity Initiative. Benton Harbor is located in the Southwest Region 8. Locally known as the "Berrien Housing Resource Network", or HRN, the HRN meets monthly and its membership is made up of many local social service organizations such as Emergency Shelter Services (ESS), Berrien County Health and Human Services, Berrien Mental Health Authority, the Region IV Area Agency on Aging, Southwest Michigan Community Action Agency (SMCAA), The Salvation Army, and many others to work together in helping individuals and families receive the services and funds that are entitled to them.

Emergency Shelter Services (ESS) is located in Benton Harbor and has become a focal point for serving the homeless population throughout Berrien County. ESS is the designated Housing Assessment and Resource Agency (HARA) for the County (locally known as "The Connection"), and receives an Emergency Solutions Grant (ESG) funds through MSHDA and the HRN to provide services that prevent homelessness and to provide rapid re-housing to people living in homelessness. ESS operates a homeless shelter in Benton Harbor and the 6 Degrees resale shop, which employs homeless individuals as sales associates and raises funds for ESS.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

The City of Benton Harbor does not provide homelessness services. Instead, the City maintains relationships with the HRN and its member agencies that service this population, including:

1. Emergency Shelter Services: ESS provides street outreach, a homeless shelter facility, homelessness prevention and rapid rehousing services to individuals and families that are no income, low income, homeless and at risk of becoming homeless.
2. Child & Family Services of Southwestern Michigan, Inc. - Safe Shelter for Domestic Violence: The Safe Shelter for Domestic Violence provides a secure, violence free environment for survivors of intimate partner domestic violence and sexual assault along with their dependent children.

Support services offered include shelter, counseling and support groups, assistance with basic needs, a crisis hotline, and access to other resources needed to develop safe, healthy and meaningful lives for victims of domestic violence and their children.

3. The Berrien County Housing Resource Network: The Housing Resource Network is a community group made up of representatives from local non-profits, which actively works to prevent and end homelessness and poverty by developing and maintaining a system to coordinate the community's resources and services for people experiencing homelessness and those that are precariously housed. The Benton County Housing Resource Network acts as the County's Continuum of Care (CoC).

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Benton Harbor does not provide emergency shelter or transitional housing for homeless persons. Instead the City maintains relationships with the HRN and its membership agencies that service this population, including:

1. Emergency Shelter Services: ESS provides street outreach, a homeless shelter facility, homelessness prevention and rapid rehousing services to individuals and families that are no income, low income, homeless and at risk of becoming homeless.
2. Child & Family Services of Southwestern Michigan, Inc. - Safe Shelter for Domestic Violence: The Safe Shelter for Domestic Violence provides a secure, violence free environment for survivors of intimate partner domestic violence and sexual assault along with their dependent children. Support services offered include shelter, counseling and support groups, assistance with basic needs, a crisis hotline, and access to other resources needed to develop safe, healthy and meaningful lives for victims of domestic violence and their children.

The Benton Harbor Salvation Army provides an emergency shelter, addiction assistance, ministerial services, disaster relief, and family and youth services to the community.

**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**

The City of Benton Harbor does not directly assist homeless persons but instead, maintains a relationship with the HRN and its member agencies that assist homeless individuals make the transition to permanent housing and independent living.

**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.**

The City of Benton Harbor does not directly assist homeless persons but instead, maintains a relationship with the HRN and its member agencies that assist homeless individuals avoid becoming homeless.

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

### **Introduction:**

As a grantee of CDBG funds, the City of Benton Harbor is required to take steps to affirmatively further fair housing in the community. In FY 2017, the City partnered with the Fair Housing Center of Southwest Michigan to conduct a fair housing event at Benton Harbor City Hall. Approximately 20 attendees came to hear the director of the Fair Housing Center present on fair housing laws and policies, and to increase awareness of unfair housing actions and policies. The City will continue to partner with the Fair Housing Center of Southwest Michigan, the predominate provider of fair housing information and resources in the area.

Additionally, in FY 2018/2019, the City has reserved \$15,000 of its CDBG allocation to hire a consultant to prepare an update to its Analysis of Impediments (AI). Once that is completed (estimated late 2019), the City will take steps to address the recommendations provided in the report.

### **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**

As the City's Community & Economic Development Department becomes more stable in terms of employees, the City is now better equipped to focus on meeting the requirement of affirmatively furthering fair housing. The City will continue to reserve funds in its yearly allocation to address the forthcoming findings from the updated AI, as well as to better prepare itself to comply with the new Affirmatively Furthering Fair Housing (AFFH) rule, once it becomes active.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

#### **Actions planned to address obstacles to meeting underserved needs**

The City does not have sufficient information on underserved needs in the community. During PY 2019, the City will continue to focus on strengthening relationships with area public services providers. This will include such actions as:

- city staff attendance at monthly Housing Resource Network meetings,
- enhancing the participation of local public service agencies in the CDBG Annual Plan process by notifying agencies directly about public meetings and sending out a survey during the planning process to assess what the underserved needs are and recommended ways to address them, and
- consider reserving CDBG funds to fund public service agencies.

#### **Actions planned to foster and maintain affordable housing**

The City of Benton Harbor will continue to use CDBG funds to provide code enforcement activities to the community. In response to those activities, the City will continue to maintain its affordable housing stock by providing income-eligible homeowners with the funds needed to make needed repairs to their homes. These funds will help to ensure that the City's housing stock is safe, decent, and an asset to the neighborhoods in which they are located. The Southwest Michigan Community Action Agency (SMCAA) operates a weatherization program to help homeowners make energy-efficient repairs to their homes. The City leverages these funds through its home rehabilitation loan program.

#### **Actions planned to reduce lead-based paint hazards**

The City recently reestablished its home rehabilitation loan program. The majority of homes located in Benton Harbor were built before 1978. Through the program, the City will test and address lead-based paint hazards found in participating homes. The City's policy on addressing lead-based paint is focused on abatement, as opposed to using temporary measures. The City will continue to reserve CDBG funds for its home rehabilitation loan program during PY 2018/2019.

#### **Actions planned to reduce the number of poverty-level families**

The City of Benton Harbor will continue to work with social service agencies and local organizations (i.e., SMCAA, Salvation Army, Area Churches, Lakeland Hospital, ) work together in helping individuals and families receive the services and funds that they need to meet their daily needs.

Several community employment service programs and job training programs offered locally (i.e. Kinexus,

MOSAIC CCDA, United Way) are also designed to assist in reducing the number of poverty level families by providing educational and life skills necessary to survive in today's workforce. These efforts will incrementally assist in the reduction of number of the poverty level families through the provision of housing and community and support services.

### **Actions planned to develop institutional structure**

The City of Benton Harbor's Community & Economic Development Department, which administers the City's CDBG program, has experienced significant staff turnover over the past 5 years. Other City departments experienced a high rate of turnover and position vacancies. The high rate of turnover severely stunted the operations and growth of the CDBG program. The City is now working to stabilize its institutional structure by seeking out and hiring qualified, experienced individuals who are passionate about working for the City. The City hired a new Director of Community & Economic Development (CEDD) in November 2018 and a Program Coordinator in December 2018. The new Director has made it her mission to transform the CEDD, work toward compliance with HUD requirements, and invigorate the CDBG program by instituting new activities and increase CDBG spending in line with the Consolidated Plan. The CED department has also established a working relationship with the City's HUD field representative and financial analyst in ongoing efforts to address the problems created by past CDBG program inactivity. The department has weekly phone calls, with the City's HUD field representative and she has reached out to her counterparts in other grantee municipalities throughout Southwest Michigan and beyond, to establish a network of assistance. These actions will continue into PY 2019.

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

The City is committed to focusing efforts to ensure the coordination of stakeholders and continual improvements to the programmatic delivery system. The City will continue to look for ways to enhance coordination in the implementation of the Consolidated Plan through its established partnership with Southwest Michigan Community Action Agency (SMCAA) and relationships with the Benton Harbor Housing Commission, Harbor Habitat for Humanity, MOSAIC CCDA, Kinexus, the Berrien County Health Department, the Michigan Department of Health and Human Services (MDHHS) - Benton Harbor. The City will continue to work with the Continuum of Care for Region 8 through the Housing Resource Network, to promote a communitywide commitment to the goal of ending homelessness; to seek out funding for efforts that seek to address homelessness in Region 8; to support methods to assist in the re-housing of homeless individuals.

The City will continue to coordinate with local stakeholders, i.e. Kinexus, MOSAIC, Cornerstone Alliance, the Southwest Michigan Planning Commission, and Michigan's Great Southwest Strategic Leadership Council to support economic development through the creation of jobs and educational opportunities for neighborhood residents living in the city.



## Program Specific Requirements

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

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

