



BENTON HARBOR

Port of Opportunities

2022 Annual Action Plan

DRAFT

Substantial Amendment (Public Infrastructure & Fund Reallocation)

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

Annual Action Plan
2022

1

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A substantial amendment was made to the 2022 AAP to reallocated funds from existing projects and add a public infrastructure improvement goal and project. Planned activities under the public service project were also amended.

Executive Summary

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

1. Introduction

The City of Benton Harbor strives to provide a suitable living environment especially for low- to moderate-income (LMI) households and special needs communities. As a designated entitlement community by the U.S. Department of Housing and Urban Development (HUD), the City is eligible for federal Community Development Block (CDBG) funds allocated through HUD's Community Planning Development program. The City's Community & Economic Development Department (CEDD) administers CDBG grant funds and ensures compliance of HUD regulations and guidelines. These funds will help the City address the community development objectives outlined by HUD, which include, but are not limited to: affirmatively furthering fair housing, affordable housing activities, public infrastructure & facilities improvements, and public services for low- to moderate income households and the special needs community.

This plan is the PY 2022 Annual Action Plan, which is the second year of the Consolidated Plan (ConPlan), and describes the eligible activities that will work towards accomplishing the goals established in the ConPlan. The ConPlan identifies priority needs in Benton Harbor and provides the overall 5-year strategy to address those needs. By addressing the identified priority needs, the City will improve the quality of life of residents in Benton Harbor. PY 2022 starts on July 1, 2022 and ends on June 30, 2023.

Substantial Amendment (Public Infrastructure & Reallocation of Funds)

The City of Benton Harbor will make a Substantial Amendment to the 2022 AAP to reallocate funds from existing public service and housing rehab projects to a new public infrastructure project. This will include a new goal for public infrastructure improvements that will benefit residents living in low/mod areas. New activities under the public infrastructure project will be a community tree removal and sidewalk improvement activity. The City will also amend planned activities under the existing public service project to include the Community Food and Nutrition Program and foodbank services. The Substantial Amendment has been updated in the following areas:

ES-05: A summary of the amendment has been added and citizen participation efforts have been summarized.

AP-12: Citizen participation efforts have been summarized and added to the citizen outreach table.

AP-20: A public infrastructure goal was added and goal funds were adjusted to account for the added goal.

AP-35/38: A summary was added to the AP-35, a new public facilities and infrastructure project was added and the AP-38 project details, fund amounts and planned activities were updated.

AP-55: An adjustment to the housing rehab goals was made due to the City reducing funds towards this goal.

2. Summarize the objectives and outcomes identified in the Plan

The City has developed its strategic plan based on an analysis of the data presented in this plan and the community participation and stakeholder consultation process. Through these efforts, the Town has identified four priority needs and associated goals to address those needs. The priority needs and goals are as follows:

Priority Need: Expand & Improve Public Infrastructure/Facilities

Goal: 1A Expand & Improve Public Infrastructure

The City will work to expand and improve public infrastructure in Benton Harbor. These activities include improvements to infrastructure such as streets, sidewalks, ADA improvements, and storm water and water systems in LMI neighborhoods.

Goal: 1B Improve Access to Public Facilities

The City will work to improve access to public facilities in Benton Harbor. These activities include improvements for neighborhood facilities, community centers and park and recreational facilities in LMI neighborhoods.

Priority Need: Affordable Housing Development & Preservation

Goal: 2A Housing Rehabilitation

The City will continue to provide for housing rehabilitation through its minor rehabilitation and emergency repair programs. These activities will continue to improve the safety and accessibility of homes throughout the community.

Goal: 2B Code Enforcement

The City will continue to provide for code enforcement activities. Inspections will occur at residential properties and ensure that safety and ordinances are met throughout the City.

Priority Need: Removal of Slum & Blight

Goal: 3A Clearance and Demolition

The City will utilize CDBG funds to reduce residential and commercial vacancy and blight throughout the community. This will ensure the removal of dilapidated structures.

Priority Need: Public Services & Quality of Life Improvements

Goal: 4A Provide Public Services for LMI & Special Needs

The City will work to increase the capacity of local service providers that offer vital services that improve the quality of life for to low- and moderate income (LMI) households and special needs groups in Benton Harbor. Public Services that are intended to help assist LMI residents include summer programs, youth services, health services and more. Vital support services for special needs groups include the elderly, persons with a disability, the homeless and victims of domestic violence.

Goal: 4B Affirmatively Further Fair Housing

The City will provide fair housing activities that will affirmatively further fair housing in Benton Harbor.

In PY 2022, the City will focus on affordable housing preservation with owner-occupied housing rehab activities and public services which will target low- to moderate-income youth individuals and households.

3. Evaluation of past performance

The City of Benton Harbor, with other public, private and nonprofit community housing providers and non-housing service agencies, has made significant contributions to provide safe, decent and affordable housing, and a suitable living environment especially for low- to moderate-income individuals in the community. However, public services and public improvements and the removal of slum and blight remain some of the most prolific issues facing Benton Harbor, as documented by the current Consolidated Plan and the Consolidated Annual Performance and Evaluation Report (CAPER).

The CAPER provides an assessment of progress towards the five-year goals and the one-year goals of HUD entitlement grant CDBG in the City. The City's most recently completed CAPER is for PY 2020. The following is a highlight from the CAPER report.

The City of Benton Harbor's Community & Economic Development Department (CEDD) continued to experience significant turnover in key positions in the CEDD over the past several years, which resulted in lower spending of program funds than anticipated. In the program year two positions were filled, including the Director, which has brought stability to the program. The City's 2020 AAP was approved in May of 2021 and the City has been working diligently to start PY 2020 activities before the end of program year.

Provide for Economic Development Activities: The City was able to implement a project to provide for economic development activities in the Summer Youth Work Program. The program employed 58 LMI youth for summer maintenance employment in neighborhoods and in City Parks. The activities conducted under supervision were sweeping and cleaning gutters along streets with leaves and debris, picking up paper and trash along streets and lots, cleaning up and maintaining the cleanliness of parks, emptying trash receptacles, raking and sweeping, and whatever was necessary to improve the appearance of the City and its facilities.

Assist Home Owners with Needed Repairs: The City also continues to provide rehab program admin for the Southwest Michigan Community Action Agency (SMCAA) to assist homeowner households with housing rehab, however there were no rehab activities completed due to COVID-19 in PY 2020. The SMCAA Home Rehab Loan Program activity remains open and was funded in 2019 however, no work has been taking place for any of the prior year grants in PY 2020. When rehab activities start again, the City anticipates to report accomplishments in the next CAPER.

4. Summary of Citizen Participation Process and consultation process

The City of Benton Harbor encourages participation by all citizens, and with particular emphasis on LMI households and those with special needs to participate in the development planning process. The City follows its HUD approved Citizen Participation Plan and has developed a formal process for gathering input from citizens and community stakeholders. As part of the planning and development of the AAP, the City held a public hearing on July 5, 2022 and a 30-day public comment period to receive citizen's views on the plan.

The City also held an initial 14-day public comment period and a public hearing on April 27, 2022 to gather feedback on the community development needs in the City.

Details of the citizen process are located in the PR-15 Citizen Participation section of this plan. All public notices and newspaper ads, community and stakeholder surveys, and public hearing meeting minutes and attendance have been attached to the AD-25 citizen participation attachment.

Substantial Amendment (Public Infrastructure & Reallocation of Funds)

A 30-day public comment period was held to allow for the public to review and make comments on the draft 2022 AAP Substantial Amendment. The public comment period was held from **12/30/2022** to **01/30/23**. The Substantial 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 the CEDD at the address above.

The City Commission held a public hearing to review the draft Substantial Amendment on **01/18/2023** 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 Substantial Amendment to the 2022 AAP.

5. Summary of public comments

The following were comments received from the public.

At the July 5, 2022 public hearing there were three (3) comments made from the public.

- A Commissioner stated they were speaking with HUD about redlining insurance and would like the Director to get involved in fixing the problem.
- The public hearing should be separate from the Commission meeting.
- A suggestion was made that all sidewalk work be put to a halt.

There were three comments made at the April 27, 2022 public hearing.

- There was a comment in support of a project for first-time homebuyers.
- There was a comment for increased funding for the Summer Youth Program and allow young people from anywhere within zip code 49022 to participate.
- There was a comments that CDBG be used to establish a hydroponics facility to grow healthy foods and train young people as the City is a food desert.

All comments were accepted. A summary of public comments is located in the AP-12 Citizen Participation section of this plan. The public comments were uploaded in the AD-26 Administration.

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

All comments were accepted. There were no comments rejected or not accepted. There were no organizations or agency types not intentionally consulted.

7. Summary

PY 2022 is the second year of the 5-Year 2021-2025 Consolidated Plan which identified the priority needs and goals used in this AAP. The priority needs of the City of Benton Harbor were identified through a comprehensive citizen participation outreach effort which included a community survey that was offered online; a stakeholder survey for community nonprofit organizations; consultation by nonprofit partners and regional service partners; and finally, a review of the needs assessment and housing market analysis in the 5-Year Consolidated Plan.

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.

Consolidated Plan Public Contact Information

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

1. Introduction

The section identifies the organizations consulted in the development of the Consolidated Plan and this plan, which helped to inform the priorities and goals of the AAP. The organizations listed in the table below represent key stakeholder organizations which consist of nonprofits, government departments and agencies and planning organizations in Benton Harbor. Stakeholder input helped to identify the community's priority needs in Benton Harbor and associated goals to address these needs.

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) is to work toward developing relationships with local services providers where none currently exist, and to strengthen existing relationships. The City continues to work towards improving its citizen participation process, including engaging with local services providers, governments and governmental agencies, and housing providers.

CEDD has made it a priority to focus on enhancing coordination between the City and these entities, by attending meetings, phone calls, and emails. Staff has also begun compiling a list of all relevant agencies and entities with the goal of increasing communication, including sending out a public and stakeholder survey on unmet community needs, as well as notices for public participation opportunities during the plan development process.

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 City of Benton Harbors CEDD continues to develop a relationship with the Continuum of Care, the Housing Resource Network. CEDD attend 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.

The HRN 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 HRN is a primary resource for homeless needs in the City and greater county area.

The City also maintains relationships with several shelters for the homeless in Benton Harbor, which are Emergency Shelter Services, the Salvation Army and Child & the Family Services of Southwestern Michigan Safe Shelter for Domestic Violence.

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 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. While the City of Benton Harbor does not use the HMIS system, the City benefits from HMIS administration across the region.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	BENTON HARBOR
	Agency/Group/Organization Type	Housing Services-Employment Service-Fair Housing Other government - Local Services-Youth
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Benton Harbor CEDD is the lead responsible agency of the Consolidated Plan.
2	Agency/Group/Organization	Benton Harbor Housing Commission
	Agency/Group/Organization Type	Housing PHA Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The BHHC provides the for public housing needs in the City and has an active role in Fair Housing efforts in Benton Harbor. The City continues to consult with the BHHC for public housing needs.
3	Agency/Group/Organization	EMERGENCY SHELTER SERVICES INC.
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	ESS provides an emergency homeless shelter in Benton Harbor for families with children and for adults. ESS works closely with the City in the planning of the homeless strategy for Benton Harbor and is a recognized service partner organization in the CoC. The agency provided consultation of community priorities through the stakeholder survey.
4	Agency/Group/Organization	Southwest Michigan Community Action Agency
	Agency/Group/Organization Type	Services - Housing Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	SMCAA works with the City in the planning of home repair needs for Benton Harbor and is a recognized service partner organization in the CoC. The City holds ongoing discussions with SMCAA staff regarding the home rehabilitation needs in the community, and provide City staff with in depth insight into unmet housing needs and lead-based paint issues in the community.
5	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Salvation Army provides a homeless shelter in Benton Harbor for adult men and offers clothing. SA works with the City in the planning of the homeless strategy for Benton Harbor and is a recognized service partner organization in the CoC.
6	Agency/Group/Organization	The Safe Shelter
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	ESS provides an emergency homeless shelter in Benton Harbor. ESS works with the City in the planning of the homeless strategy for Benton Harbor and is a recognized service partner organization in the CoC.
7	Agency/Group/Organization	Department of Human Services - DHS Berrien County
	Agency/Group/Organization Type	Services-Health Other government - County
	What section of the Plan was addressed by Consultation?	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?	DHS is the primary social service provider agency in Berrien County. They case manage many of the participants by providing food assistance, Family Investment Program grants where indicated, child care assistance, referral to Work First programs and other DHS programs. DHS works with the City in the planning of the homeless strategy for Benton Harbor.
8	Agency/Group/Organization	Berrien County Health Department
	Agency/Group/Organization Type	Services-Health Other government - County Health Department
	What section of the Plan was addressed by Consultation?	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?	BCHD and Riverwood are the primary substance abuse counseling agency in the county. Program participants who are in need of substance abuse counseling or services are referred to the health department. BCHD works with the City in the planning of non-homeless special needs in the Plan.
9	Agency/Group/Organization	Berrien County

	Agency/Group/Organization Type	Other government – County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Benton Harbor coordinates with the County on community development needs and other strategies that improve the quality of life for residents in the City.
1 0	Agency/Group/Organization	Housing Resource Network
	Agency/Group/Organization Type	Services - Housing Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	HRN helps to address the needs of the homeless in Berrien County. The City has ongoing communication with the HRN.
1 1	Agency/Group/Organization	Southwest Michigan Planning Commission
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Southwest Michigan Planning Commission (SWMPC) serves Berrien, Cass, and Van Buren Counties as one of fourteen regional planning and development organizations in the State of Michigan.

1 2	Agency/Group/Organization	BroadbandNow
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	BroadbandNow is a research organization which publishes data on the digital divide and impact of highspeed internet in society. It believes broadband internet should be available to all Americans and its mission is to help find and compare internet options with a goal to bring attention to underserved areas. The City consulted with the BroadbandNow website for broadband access and identified highspeed internet providers in the City.
1 3	Agency/Group/Organization	Berrien County Emergency Management and Homeland Security Division
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Emergency Management Services-Hazard Mitigation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Emergency Preparedness
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Berrien County Sheriff Office of Emergency Management and Homeland Security Division provides a plan for local hazards such as floods, severe storms and severe winter. The City and its residents are provided access to this information on the division website.
1 4	Agency/Group/Organization	United Way of Southwest Michigan
	Agency/Group/Organization Type	Services-Health Services-Education Nonprofit Organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency provided consultation of community priorities that helped with the development of the plan.
1 5	Agency/Group/Organization	Riverwood Center
	Agency/Group/Organization Type	Services-Health Health Agency Publicly Funded Institution/System of Care Services-Mental Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Riverwood Center provides mental health services in the City. The agency provided consultation of community priorities that helped with the development of the plan.
1 6	Agency/Group/Organization	PACE of Southwest Michigan
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	PACE (Program of All-Inclusive Care for the Elderly) is a unique program of coordinated care that allows older adults to remain in their home. The agency provided consultation of community priorities that helped with the development of the plan.
1 7	Agency/Group/Organization	Tri-County Head Start

	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Tri-County Head Start provides early educational services for children in Berrien, Cass and Van Buren counties. The agency provided consultation of community priorities that helped with the development of the plan.
1 8	Agency/Group/Organization	CORNERSTONE ALLIANCE
	Agency/Group/Organization Type	Services-Employment Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City coordinates with Cornerstone Alliance, which is the countywide economic development agency responsible for coordinating the Ox Creek Redevelopment Project which is one of the largest economic development projects in the region.
1 9	Agency/Group/Organization	Whirlpool Corporation
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City coordinates with Whirlpool Corporation throughout the year on the organizations economic development plans.
2 0	Agency/Group/Organization	Benton Harbor Downtown Development Authority
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The City works closely with the Downtown Development Authority on downtown related development issues and projects.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

All comments were welcome. There were no agency types intentionally not consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Housing Resource Network (HRN)	HRN and the City share the goal to end homelessness in the City and the CoC helps to inform the homeless initiatives in the plan.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Benton Harbor maintains open and consistent communication with Berrien County in the implementation and coordination of its programs. The County, through its Department of Human Services, has health and public service programs that help to enhance the current services and programs available through the City. The Southwest Michigan Community Action Agency helps to inform about the home rehabilitation needs in the community, and also provides City staff with in depth insight into unmet housing needs and lead-based paint hazards in the community. The Housing Resource Network (HRN) is connected to several organizations throughout the southwest Michigan regions and helps to address the needs of the homeless in Berrien County. HRN is also the homeless Continuum of Care, and the City has ongoing communication with the HRN.

AP-12 Participation – 91.105, 91.200(c)

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

The City of Benton Harbor’s citizen participation process closely adheres to HUD’s requirements set within the City’s Citizen Participation Plan. This plan includes gathering participation from all City residents, in particular low- and moderate-income persons, and the special needs community. The plan also consulted local stakeholders community organizations for input on the community development needs and funding priorities.

Citizen participation efforts for the development of the plan included a 30-day public comment period, which was held to allow members from the public an opportunity to review and make comments on the draft plan. A public hearing was also held on July 5, 2022 to allow members of the public an opportunity to make comments on the plan. All comments were welcome. The City also held an initial 14-day public comment period and a public hearing on April 27, 2022 to gather feedback on the community development needs in the City.

See in the following table for details of the citizen participation outreach efforts.

Substantial Amendment (Public Infrastructure & Reallocation of Funds)

A 30-day public comment period was held to allow for the public to review and make comments on the draft 2022 AAP Substantial Amendment. The public comment period was held from **12/30/2022** to **1/30/2023**. The Substantial 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 the CEDD at the address above.

The City Commission held a public hearing to review the draft Substantial Amendment on **January 18** at **5:30 PM**. City Commission meetings are held at City Hall, 200 E. Wall Street, Benton Harbor, MI in the Commission Chamber.

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
1	Public Hearing	Non-targeted/ broad community	A public hearing was held at the Planning and Economic Development Committee on April 27, 2022 at 5:30 PM to review and discuss the proposed plan. The public hearing was held at City Hall, 200 E. Wall Street, Benton Harbor, MI. Members from the public were encouraged to review and make comments on the draft plan.	There were three comments made at the public hearing. 1. There was a comment in support of a project for first-time homebuyers. 2. There was a comment for increased funding for the Summer Youth Program and allow young people from anywhere within zip code 49022 to participate. 3. There was a comments that CDBG be used to establish a hydroponics facility to grow healthy foods and train young people as the City is a food desert.	All comments were welcome.	NA

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
2	14-Day Public Comment Period	Non-targeted/ broad community	A 14-day public comment period was held from April 13, 2022 to April 27, 2022 to allow the public an opportunity provide input on the CDBG program and creation and development of the PY 2022 AAP. Comments could be returned to the Community Development office at 200 E. Wall Street, Benton Harbor, MI or emailed to alittle@bhcit.us .	There were no comments made.	All comments were welcome.	www.bhcit.us

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
3	30-Day Public Comment Period	Non-targeted/ broad community	<p>A 30-day public comment period was held from May 20, 2022 to June 20, 2022 to June 20. Due to the timing of the published notice, the comment period was then extended to July 8, 2022 to allow the public an opportunity review and make comments on the draft plan. A copy of the draft plan was made available at the Benton Harbor Public Library at 213 E. Wall Street, Benton Harbor, MI or at City Hall at 200 E. Wall Street, Benton Harbor, MI. The draft plan was also made available on the City website at: www.bhcity.us . Comments could be returned to the Community Development office at 200 E. Wall Street, Benton Harbor, MI or emailed to alittle@bhcity.us.</p>	There were no comments made.	All comments were welcome.	NA

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
4	Public Hearing	Non-targeted/ broad community	A public hearing was held at the Benton Harbor City Commission on July 5, 2022 at 7:00 PM to review and discuss the proposed plan. The public hearing was held at City Hall, Commission Chamber, 200 E. Wall Street, Benton Harbor, MI. Members from the public were encouraged to review and make comments on the draft plan.	At the public hearing there were three (3) comments made from the public. 1. A Commissioner stated they were speaking with HUD about redlining insurance and would like the Director to get involved in fixing the problem. 2. The public hearing should be separate from the Commission meeting. 3. A suggestion was made that all sidewalk work be put to a halt.	All comments are welcome.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
5	30-Day Public Comment Period	Non-targeted/ broad community	A 30-day public comment period was held to allow for the public to review and make comments on the draft Substantial Amendment. The public comment period was held from 12/30/2022 to 01/30/2023 . The Substantial 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.	A summary of comments will be included at the conclusion of the public comment period.	All comments accepted.	https://bhcity.us/community-economic-development/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
6	Public Hearing	Non-targeted/ broad community	The City Commission held a public hearing to review the draft Substantial Amendment on 01/18/2023 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 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

The City of Benton Harbor’s Community & Economic Development Department administers CDBG funds within the jurisdiction. Based on HUD allocation notices, the City anticipates receiving \$411,037 in CDBG funding during the 2022 program year.

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	411,037	0	0	411,037	1,233,111	PY 2022 is the second year of the ConPlan. The expected amount available is 3x more years of the annual allocation.

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

There is a need for additional resources to help assist LMI households in Benton Harbor. The City will work to identify and leverage these additional resources with CDBG funds. The City will use 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 works with the Southwest Michigan Community Action Agency (SMCAA) as a subrecipient in administering housing rehab programs to eligible LMI single-family homeowner occupied housing in the City.

The City has entered into discussions with the Michigan Department of Health and Human Services (DHHS) regarding their lead free homes program associated with the Medicare Waiver where either someone in the home is on Medicare or Medicaid or if there are children in the home. The City has entered into a cooperative agreement as well as a \$100,000 contract from the state to fund lead abatement in three older Benton Harbor homes. DHHS has agreed to perform all assessments on qualifying homes that we are seeking to utilize CDBG funds to rehabilitate and will perform abatements on many other homes. These cooperative arrangements are effectively leveraging our program whereby the CDBG funding that would otherwise be committed to lead assessments and abatement, can support the housing rehabilitation itself permitting the program to service more homes of low-moderate income citizens.

The City has also leveraged its Summer Youth Employment which would have serviced only around 40 youth due to financial limitations of its 15% cap on public services. Through discussions and negotiations with the Southwest Michigan Community Action Agency (SMCAA), the City was awarded a CSBG contract for an additional \$75,000 to fund additional youth employment positions, and the U.S. Dept. of Labor funded Michigan Works program, made available and additional 119 slots for older youth ages 16 thru 19 years old.

Likewise, the City has leveraged a grant of \$75,000 from our local Brownfield Authority to be used to fund research and assistance by the University of Michigan on our Ox Creek redevelopment project, which is expected to cost up to \$15-\$18 million overall. Congressman Upton has requested a \$4 million earmark for the project and another \$6 million has been requested to fund the development of the lighted elevated

boardwalk/bike path along the revitalized ox creek corridor.

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

The City has a priority to improve infrastructure in LMI areas of the City. The City has identified sidewalk replacement and improvements so LMI individuals and families can have accessible, clean and safe pathways.

This priority was identified through the citizen participation process and community survey during the development of the plan. The City has not identified specific streets and sidewalks, however it will target city-owned streets and sidewalks in low/mod block group tracts in the City that have been identified as low/mod. According to HUD's CDBG Low Mod Income Summary Data (LMISD), the Low/Mod Block Group Tracts are: 0003001, 0003002, 0004001, 0004002, 0005001, 0006001, 0006002, 0022002, 0023002, and 0025002. For more information on how these tracts are determined see the SP-10.

Recently, the City made improvements to the Buss and Sickle Street areas in the low/mod block group tract 260210003001.

The City will also continue to make improvements to public facilities over the next 5-years of the Consolidated Plan as needs are identified. The City currently makes improvements to the Armory Community Center at 472 Cass Street, as well as all the City parks located in LMI areas which can be found listed in the City's Parks and Recreation webpage: <https://bhcity.us/parks-recreation/>

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	2A Housing Rehabilitation	2021	2025	Affordable Housing		Affordable Housing Development & Preservation	CDBG: \$86,233	Homeowner Housing Rehabilitated: 3 Household Housing Unit
2	4A Provide Public Services for LMI & Special Needs	2021	2025	Non-Housing Community Development		Public Services & Quality of Life Improvements	CDBG: \$62,402	Public service activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted
3	1A Expand & Improve Public Infrastructure	2021	2025	Non-Housing Community Development		Expand & Improve Public Infrastructure/Facilities	CDBG: \$262,402	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1000 Persons Assisted

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	2A Housing Rehabilitation
	Goal Description	The City of Benton Harbor will continue to provide for housing rehabilitation through its minor rehabilitation and emergency repairs programs. Through housing rehab activities, the City will continue to provide for improving the safety and accessibility of homes throughout the community.
2	Goal Name	4A Provide Public Services for LMI & Special Needs
	Goal Description	The City will fund vital services that improve the quality of life for to low- and moderate income (LMI) households and special needs groups in Benton Harbor. Public Services that are intended to help assist LMI residents include activities such as a food pantry, after school tutoring, summer programs, youth services, health services and more.
3	Goal Name	1A Expand & Improve Public Infrastructure
	Goal Description	The City will fund activities that expand and improve public infrastructure in Benton Harbor. These activities include improvements to infrastructure such as streets, sidewalks, ADA improvements, and storm water and water systems in low- and moderate-income neighborhoods.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Benton Harbor’s CDBG program provides funding for projects within the City limits. For PY 2022, the City will focus its CDBG funding efforts on decent and safe affordable housing preservation and public services.

Substantial Amendment (Public Infrastructure & Reallocation of Funds)

The City of Benton Harbor will reallocate funds from existing public service and housing rehab projects to a new public infrastructure project. New planned activities under the public infrastructure project will be a community tree removal (partial or total grant) activity and sidewalk improvements. The City will also amend planned activities under the existing public service project to include the Community Food and Nutrition Program and foodbank activities.

Projects

#	Project Name
1	CDBG: Program Administration (2022)
2	CDBG: Public Services (2022)
3	CDBG: Housing Programs (2022)

Table 3 - Project Information

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

The City of Benton Harbor responds to the needs expressed by citizens who state that revitalizing neighborhoods and preserving the existing housing stock are critical.

To improve the quality of life of all citizens in Benton Harbor, the Community Development Department will address the need for affordable housing preservation for LMI residents.

According to the NA-10 assessment of the 5-Year Consolidated Plan, lower income households are more heavily burdened with housing costs. As LMI households in Benton Harbor are more heavily cost burdened, they are much less likely to afford housing rehab and prevent housing conditions that mean lead to homelessness.

The City will also continue to engage community partners to provide public services that improve the quality of life for LMI and special needs residents, code enforcement that will demolish blighted commercial properties and sidewalk and street improvement projects in targeted Low/Mod areas that will provide safety and community improvement to neighborhoods.

In PY 2022, the City will focus on public services, public infrastructure improvements and affordable housing preservation.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG: Program Administration (2022)
	Target Area	
	Goals Supported	2A Housing Rehabilitation 4A Provide Public Services for LMI & Special Needs
	Needs Addressed	Affordable Housing Development & Preservation Public Services & Quality of Life Improvements
	Funding	CDBG: \$82,207
	Description	Program administration of the CDBG program not to exceed 20% of allocation funds. The City CEDD will administer and plan for public infrastructure, public facilities, housing rehab, clearance and demolition, and public service activities within the program year, and plan for upcoming AAPs.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A.
	Location Description	Citywide
	Planned Activities	CDBG Administration activities (21A).
2	Project Name	CDBG: Public Services (2022)
	Target Area	
	Goals Supported	4A Provide Public Services for LMI & Special Needs
	Needs Addressed	Public Services & Quality of Life Improvements
	Funding	CDBG: \$35,000
	Description	CDBG funds will be utilized for public services. Public service activities include the Community Food and Nutrition program for the elderly, and Foodbank services.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted
	Location Description	Citywide, eligible.
	Planned Activities	Planned public services include: Community Food and Nutrition (05A): \$25,000 Foodbank (05W): \$10,000
3	Project Name	CDBG: Housing Programs (2022)
	Target Area	
	Goals Supported	2A Housing Rehabilitation
	Needs Addressed	Affordable Housing Development & Preservation
	Funding	CDBG: \$58,830
	Description	Housing activities from the City will include the Home Rehabilitation Loan Program and repairs to eligible single-family, homeowner occupied houses. The City will provide up to \$25,000 to eligible single-family homeowners to make eligible repairs to their homes.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated: 3 Household Housing Unit
	Location Description	Citywide, eligible.
	Planned Activities	Planned housing activities include: Housing Rehabilitation Programs (14A): \$58,830
4	Project Name	CDBG: Public Improvements (2021)
	Target Area	
	Goals Supported	1A Expand & Improve Public Infrastructure
	Needs Addressed	Expand & Improve Public Infrastructure/Facilities
	Funding	CDBG: \$235,000

Description	The City will provide for public improvements to infrastructure through sidewalk replacement/improvements and a community tree removal activity. These improvements are intended to benefit residents living in LMI areas.
Target Date	9/30/2023
Estimate the number and type of families that will benefit from the proposed activities	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1000 Persons Assisted
Location Description	Citywide in LMI areas.
Planned Activities	Planned public improvements to infrastructure include: Sidewalk Replacement/Improvements (03L): \$200,000 Community Tree Removal (03Z): \$35,000

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 of Benton Harbor does not allocate funding based solely on geographic requirements. Individuals or households must meet income qualifications in order to receive direct assistance from activities and services in the CDBG program. For eligible public facilities & infrastructure improvement activities the City will be targeting Low/Mod Block Group Tracts. Benton Harbor has identified all but one Census Block Group Tracts are Low/Mod as defined by HUD. See below on how the City will determine these tracts.

Geographic Distribution

Target Area	Percentage of Funds
NA	NA

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Benton Harbor does not allocate funding based solely on geographic requirements. When the project or planned activities are intended to serve individuals or households directly, such as housing rehab or public services with direct benefits, beneficiaries must meet income and residency requirements in order to receive assistance. CDBG program funds will be utilized to develop programs and activities that will provide assistance to low- and moderate-income residents and benefit the City as a whole in improving the quality of life for the residents.

The City has also identified public facility and infrastructure improvement activities as a need in Benton Harbor. These planned activities have an “area-wide” benefit. Per HUD requirements, these areas must be within an eligible Census Block Group Tract, as defined by HUD-CDBG regulations, whereby the majority of the residents are low- to moderate-income (51%). There is only one tract this is not Low/Mod in Benton Harbor (0006003) and all other tracts are Low/Mod.

To determine these tracts the City utilizes HUD’s CDBG Low Mod Income Summary Data (LMISD) from the HUD Exchange website, which has defined the eligible block group tracts within the jurisdiction. The tracts can be at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Benton Harbor does not use CDBG funds directly for the development of new affordable housing. The City however uses CDBG funds for emergency rehabilitation of existing housing for eligible low- to moderate-income owner-occupied households. The City provides forgivable loan assistance of 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.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	3
Special-Needs	0
Total	3

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	3
Acquisition of Existing Units	0
Total	3

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

Discussion

Homeowner Housing Rehabilitated: 3 LMI Household Housing Unit

AP-60 Public Housing – 91.220(h)

Introduction

The City of Benton Harbor's public housing needs is served by the Benton Harbor Housing Commission (BHHC). BHHC works to provide safe, decent, and sanitary housing to low- and very low-income families, and in an environment that fosters self-sufficiency and community pride. Its mission is to provide quality management of publicly assisted residential housing in a manner that will ensure optimum success of each resident and the property in which they live; and ever-improving work environment for their employees; and a model of excellence in the community in which the BHHC works. The BHHC administers the Housing Choice Voucher/Section 8 program and the Public Housing rental program. The BHHC owns and operates over 360 Public Housing (PH) units and administers over 200 Housing Choice Vouchers (HCVs).

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

The BHHC will continue to administer the Housing Choice Voucher/Section 8 program and the traditional Public Housing rental program. Planned actions include ongoing repair and maintenance of existing units as well as provision/maintenance of necessary neighborhood infrastructure necessary for new construction continues to be of high priority (also as it pertains to requirements by Section 504 Compliance Agreement).

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

The Benton Harbor Housing Commission encourages public housing residents to participate in activities and planning of programs for residents. For this purpose, the BHHC works with residents in the Resident Advisory Board (RAB). The 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.

The BHHC also has an Economic Self-Sufficiency Program which is designed to encourage, assist, train and facilitate economic independence of publicly assisted families and/or help provide work for families. Activities in the program include job readiness or job training, training through career centers and workforce investment boards, employment counseling and work placement, higher education and other financial/literary classes, apprenticeships, budget and credit counseling, and any other programs necessary to ready a participant for work. Providing income is a major need for BHHC residents and the lack of income is a primary obstacle to gaining homeownership. Through this program, BHHC affordable housing participants can become economically self-sustainable and take the steps necessary to participate in homeownership.

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

N/A. The BHHC is not designated as “troubled”.

In 2013 the BHHC was removed from the troubled Housing List with the U.S. Department of Housing and Urban Development. The BHHC has been successful in accessing federal and state dollars in meeting its mission of providing safe, decent, sanitary and in good repair housing for low to very low income families as well as to promote personal, economic and social upward mobility as a means to make the transition from subsidized to non-subsidized housing. BHHC also participates in the consolidated and annual action planning process.

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

Introduction

The City of Benton Harbor's homeless individuals and families are served by the Southwest Region 8 Balance of State Continuum of Care. While the CoC doesn't list shelters that primarily serves the City, homeless persons in the City have access any of the nearby local shelter or shelters in the County. These shelters are Emergency Shelter Services (ESS), Southwest Michigan Community Action Agency, Safe Shelter, The Salvation Army, and the Department of Community Health Berrien.

For Other Special Needs, there are three primary groups with non-homeless special needs in the Benton Harbor. They are the elderly and frail elderly, those with HIV/AIDS and their families, and the mentally or physically disabled. This section will explain who they are, what their needs are, and how the city is accommodating or should accommodate these needs.

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 directly provide homelessness services. Instead, the City maintains relationships with the Housing Resource Network and its member agencies that service this population. 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 is a primary resource for homeless needs in the City and County.

The City maintains relationships with several shelters for the homeless in Benton Harbor, which are Emergency Shelter Services, the Salvation Army and Child & the Family Services of Southwestern Michigan Safe Shelter for Domestic Violence.

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.
3. 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.

Initiatives through the regional and statewide Continuum of Care benefit homeless persons in the area seeking permanent housing. One of these programs is the CoC Permanent Supportive Housing (PSH) program. The CoC also offers supportive housing as a combination of housing and services intended as a cost-effective way to help people live more stable, productive lives.

Supportive housing is widely believed to work well for those who face the most complex challenges – individuals and families with extremely low incomes, and who either meet the HUD definition of homeless or who have special needs. Supportive housing can be coupled with such social services as job training, life skills training, alcohol and drug abuse programs and case management to populations in need of assistance. Supportive housing helps people recover and succeed while reducing the overall cost of care, and services are flexible and primarily focused on the outcome of housing stability.

Throughout the state there are over 2,500 housing units targeted for supportive housing tenants. The eligibility for supportive housing is determined by a local lead service agency and the management company for each property. These apartments and homes have been provided with a federal or state subsidy to make the unit affordable to residents with incomes at or below the 30 percent area median income for that county. Benton Harbor is located in region 8, which is the Southwest Michigan service

area.

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 statewide Michigan Interagency Council on Homelessness Continuum of Care will help coordinate effectively with mainstream service providers for families at risk of becoming homeless or from returning to homelessness after they have been discharged from previous care. The CoC has a Campaign to End Homelessness website online where information could be passed, and referrals to resources such as health, housing and employment services could be made. The website can be found at: <https://www.michigan.gov/mcteh>

At this time the City does not work directly with homeless persons, and refers this group to services providers within the City that are connected to the CoC.

Helping Non-Homeless Special Needs individuals and Families by Household Type:

Elderly & Frail Elderly: Homeless shelters such as Emergency Shelter Services Inc., and the Department of Community Health - Berrien CoC PSH offer shelter services. Food bank programs and meal services from Soup Kitchen Inc, and Southwest Gleaners Food Bank help to provide food which can help offset housing costs and leave more income for low-income elderly. InterCare is a health agency that provides medical services to all persons in the area including the elderly and persons with a disability and has a sliding fee program to assist LMI households.

Persons with a Disability: Referrals can be made for persons with a disability needing financial assistance through the Southwest Michigan Community Action Agency. Activities include referrals to local programs and direct cash assistance for eligible persons. The Salvation Army and Berrien County also provide assistance referrals and links to charities that may provide utility assistance, clothing, personal needs, and disaster relief. Food bank programs and meal services from Soup Kitchen Inc, and Southwest Gleaners Food Bank help to provide food which can help offset housing costs and leave more income for low-income persons with a disability. InterCare is a health agency that provides medical services to all persons in the area including persons with a disability and has a sliding fee program to assist LMI households.

Persons with HIV/AIDS and their families: The primary service agency for assisting persons with HIV/AIDS and their families in Benton Harbor is the Berrien County Health Department, which provide HIV services

and tests. The department however relies on community referrals for housing needs. Housing assistance for HIV/AIDS persons in need can contact the AIDS Ministry/AIDS Assist which currently operates four different housing programs: ESG, Transitional Supportive Housing, HOPWA Supportive Services (w/ rental assistance), and Permanent Supportive Housing. CARES of SW MI provides a variety of HIV/AIDS assistive services including case management, testing, prevention and other resources. InterCare is a health agency that provides medical services to all persons in the area including HIV/AIDS persons, and has a sliding fee program to assist LMI households.

Public Housing Residents: The City refers to the BHHC for assistance to public housing residents in avoiding homelessness. The City has assisted with public improvements around the Buss Complex recently and the City will continue to support the BHHC on projects just as the economic self-sufficiency program that will help public housing residents from becoming homeless, and possibly even move them closer to stable housing such as homeownership. The Salvation Army assists low-income families by providing children gifts around the Christmas holiday.

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

Introduction:

The City of Benton harbor has identified three barriers to affordable housing that are related to public policies: Regulations, Finances, and Community Perceptions.

Regulations

Regulatory barriers are present at the local, state, and federal level. These policies include local land use regulations, taxes and fees associated with development, environmental regulations, and the permitting process. Each regulation acts as an additional step that can prevent or inhibit the development of affordable housing, as well as increase the cost of unit production.

Finances

The available resources to support affordable housing has not kept up with the rising development costs. Projects often have funding gaps resulting in fewer being funded. For potential home buyers, changing regulations in the mortgage industry and few economic opportunities prevent purchasing the homes that are available.

Community Perceptions

Affordable housing is often viewed negatively and those perceptions can have a direct influence on public policy. While many people will advocate for affordable housing as a concept, they often push back when the developments will occur in their neighborhoods. This “Not In My Backyard” (NIMBY) perspective can halt affordable housing development before it begins.

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

Benton Harbor is committed to the elimination of barriers to affordable housing and commits to affirmatively furthering fair housing in the City. As the City's Community & Economic Development Department becomes more stable in terms of employees, the City will be better equipped to focus on meeting the requirement of affirmatively furthering fair housing. The City did not allocate funds in the PY 2022 AAP for further fair housing, but will continue to reserve funds in its yearly allocation in the future to address the findings from the Analysis of Impediments to Fair Housing Choice updated in July 2021, as well as to better prepare itself to comply with the new Affirmatively Furthering Fair Housing (AFFH) rule, once it becomes active. 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.

The City will continue to work with the Fair Housing Center to identify, reduce and eliminate barriers, especially those related to barriers outside of the City's control. Rising cost of construction, rising values of homes and rising rental costs are raising new or additional barriers. The City itself, as a majority of its residents are low income, is very receptive to building of low income and for that matter, any new housing. The City is concentrating on finding developers and doing all it can to cause new housing to be built for low income as well as middle income residents that the City hopes to attract. The City's willingness to use PILOTS coupled with tax credit financing to facilitate construction of low income housing continues. The City is also working on incentives and opportunities for some of our low income population to become homeowners.

The City is working with a newly established Community Development Corporation (the Benton Harbor CDC) which will be working with the Federal Home Loan Bank Board, and numerous local lenders to help identify and assist eligible candidates to become homeowners. The City has already made available two housing units for rehabilitation by the CDC and sale to eligible qualifying low income residents and anticipates adding additional units for this purpose.

The City will focus attention in the future on Impediment(s) #1-affordability challenges, #2 - substandard housing, #3 - discrimination, #4 - neighborhood disparities #5 - accessibility challenges, in addition to fair housing awareness. The updated AI can be found on the City's CED webpage at: <https://bhcity.us/community-economic-development/>

The City is currently updating its Master Plan with the firm McKenna out of Kalamazoo, MI coordinating the plan, citizen engagement, etc., which will include a focus on housing and the unmet demand for housing and housing assistance.

AP-85 Other Actions – 91.220(k)

Introduction:

Through the housing and community development programs of the City's Community & Economic Development Department (CEDD), Benton Harbor seeks to meet the needs of the underserved. Specific actions and programs are described in the following questions.

Actions planned to address obstacles to meeting underserved needs

The general lack of funds is one of the main obstacles to meeting underserved needs in the City. To address this, the City will continue to focus on strengthening relationships with area public services providers, which will expand the reach in meeting underserved needs. 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 them directly about public meetings; 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 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. This program provides forgivable loan assistance of 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.

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 CEDD seeks to address lead based paint (LBP) hazards through all related housing activity and especially the housing rehab 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.

Households that have been identified to be exposed to LBP hazards are referred to the Berrien County Health Department (BCHD) and the Childhood Lead Poisoning Prevention program. BCHD has a webpage

dedicated to information on LBP hazards and how to prevent lead poisoning. Professionals that can help identify and remove LBP hazards can be contacted at the Lead and Healthy Homes Section at phone number: (866) 691-LEAD.

Actions planned to reduce the number of poverty-level families

The activities identified in this plan will work directly to reduce poverty in Benton Harbor. These activities include; housing rehabilitation activities which will maintain or improve conditions of housing for LMI households and help them avoid homelessness; and provide supportive services for LMI households and the special needs populations to improve their quality of life in Benton Harbor.

Actions planned to develop institutional structure

The City Community & Economic Development Department (CEDD), which administers the City's CDBG program, has experienced significant staff turnover over the past 5 years. Other City departments have also experienced a high rate of turnover and position vacancies. The high rate of turnover severely stunted the operations and growth of the CDBG program and as well its plans to develop a successful working relationship with other City departments.

The City is working to stabilize its institutional structure by seeking out and hiring qualified, experienced individuals who are passionate about working for the City. The CEDD department has 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 ongoing communication with the HUD field representative and has reached out to other grantee municipalities throughout Southwest Michigan and beyond, to establish a network of assistance.

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, the Berrien County Health Department, the Michigan Department of Health and Human Services (MDHHS) and other local nonprofit stakeholders. 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; and to support methods to assist in the re-housing of homeless individuals.

Program Specific Requirements

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

Introduction:

This section describes the program specific requirements of the CDBG program. In PY 2022, there is no program income and 70% is the minimum overall benefit of CDBG funds to be used to benefit persons of low- and moderate-income.

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

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

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

Other CDBG Requirements

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

70.00%