

On October 22, 2020, HUD provided the city with a Corrected Notice regarding the FY2020 allocation. HUD requested the city execute and submit a revised SF-424. Additionally, on March 22, 2021, the Royal Oak City Commission approved an amendment to adjust funding levels to previously identified activities; no new activities.

Executive Summary

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

1. Introduction

The objective of the City of Royal Oak's Community Development Block Grant (CDBG) program is to address the housing and community development needs of low- and moderate-income (LMI) residents by taking advantage of opportunities to ensure decent and affordable housing, a suitable living environment and where applicable, expand economic development. This document will address the CDBG-funded activities, and how they achieve these objectives, for the City's CDBG program for PY2020.

At its March 22, 2021 meeting, the Royal Oak City Commission held a public hearing on a Substantial Amendment to the PY2020 Annual Action Plan. The amendment does not include any new activities. It focuses solely on funding amounts associated with previously approved activities.

Location Map

City of Royal Oak relative to Metropolitan Detroit



location map - City of Royal Oak, Michigan

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Royal Oak has developed the following community needs priorities/objectives:

Housing

Affordable Owner-Occupied and Renter-Occupied Housing - To preserve and increase the supply of affordable owner and renter-occupied housing for LMI residents, through housing rehabilitation, new construction, advocacy, policies and regulations.

Special Needs Housing - To preserve and increase the supply of affordable housing with supportive services for special needs populations, including the frail elderly and disabled persons through housing rehabilitation, new construction, advocacy, policies and regulations.

Fair Housing Choice - To promote and ensure fair housing choice for all residents.

Homeless

Homeless Public Services - To support public services that help those experiencing homelessness or those at-risk of becoming homeless to gain life skills and self-sufficiency.

Homeless Housing - To support existing housing for homeless, including emergency, transitional and permanent housing with supportive public services.

Neighborhood Investment

Public Improvements and Facilities - To enhance and improve the level of service of the City's public facilities and infrastructure in CDBG target areas by identifying, designing and implementing unique projects.

Blighted Property - To eliminate blighted commercial properties which have an overwhelming negative impact on adjacent neighborhoods and present major obstacles to the overall redevelopment of corridors throughout the City.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Single-family homes represent approximately 62% of the city's total land use. The overwhelming majority of these single-family homes were built prior to 1960. Since the inception of the CDBG program, Royal Oak has allocated tremendous resources to assist LMI single-family homeowners maintain and renovate their homes. The program is designed to provide interest free, low interest and forgivable loans for rehabilitation projects. It ensures affordability and preserves the aging housing stock. The state property tax structure, as developed under the State of Michigan constitution, and recently refinanced mortgage rates provide strong financial incentive for residents of homestead single-family properties to remain at their current place of residence. It is believed that many Royal Oak single-family residential property owners continue to remain within the City based on the property tax structure and the current socio-economic conditions. An aging population will undoubtedly change the community's overall need for additional health and social services. Many elderly homeowners live on "fixed incomes". Limited financial resources often prevent elderly homeowners from conducting necessary physical improvements to their single-family homes that may affect their immediate neighborhood. The housing rehabilitation program has been successful at stabilizing neighborhoods city-wide. Royal Oak will continue to allocate CDBG resources to this activity.

In the fall of 2013, Royal Oak completed a large infrastructure project by leveraging CDBG funds from three program years. This project was able to transform a blighted corridor and has led to greater interest in real estate along the corridor. While it is difficult to allocate funds over several program years and meet the US Department of Housing & Urban Development's timeliness of expenditures requirements, Royal Oak believes that such projects will have a large impact on a corridor or neighborhood versus small scale projects spread across the entire City each year. Royal Oak will continue to identify, design and implement unique projects which transform corridors and neighborhoods.

Additionally, several years ago Royal Oak utilized CDBG funds to purchase and demolish a blighted property with a blighted corridor. Upon completion of the large-scale infrastructure project along the same blighted corridor, developers began to approach the City to purchase and redevelop the once blighted property. The property was sold and developed with a new concept of small scale apartments. The developer specifically selected the property and type of living environment due to the CDBG-funded infrastructure improvements which created a more pedestrian-friendly corridor to neighborhoods and downtown.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Public participation is an important part of the development process of the Annual Action Plan. At the start of developing the Annual Action Plan, staff distributed electronic and postal notice of the availability for agencies to submit application for funding. The notice was distributed to a wide variety of organizations that retain strong historical connections to Royal Oak's community needs efforts. The

City's website contains an electronic application. The website posting makes the application more accessible to interested organizations. Organizations were able to submit applications during a four month timeframe. During the submittal process, City staff consults with staff from these agencies / organizations. Consulting with the agencies that help identify and address the City's priority needs is critical. Staff and elected officials made an extended effort to reach the Executive Director of the South Oakland Citizens For The Homeless. Staff met with their Executive Director on January 13, 2020 and encouraged them to make application for PY2020 funding. Royal Oak residents know what is happening in their neighborhoods. Staff tries outreach efforts to gain knowledge from residents by posting notices of public hearings, meetings, availability of documents, etc. Historically, a low percentage of residents provide input. However, momentum toward the PY2020 Annual Action Plan differ from years prior. Staff initiated efforts to conduct improvements to 2 public parks in close proximity to each other and nearby traffic diverters in the south central portion of the City. In an effort to solicit public input on the project, staff mailed 425 individual postcard invitations to all residences within 300 feet of each of the parks and diverters. Residents were asked to provide their input on park features and improvements to the traffic diverters at the December 5, 2019 meeting of the Royal Oak Parks and Recreation Advisory Board. Eighteen (18) individuals provided their input at the meeting. The City's Parks and Recreation Advisory Board also held a public hearing at their January 9, 2020 meeting. Residents were able to provide public comment at the Royal Oak Rehabilitation Board of Appeals' and City Commission meetings as described below under 5.) summary of public comments.

At its March 22, 2021 meeting, the Royal Oak City Commission held a public hearing on a Substantial Amendment to the PY2020 Annual Action Plan. One (1) individual provided public comment for the city commission's consideration. He spoke in favor of the amendment to increase the dollar amount associated with improvements to Lawson Park & nearby traffic diverters.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A public hearing was held at the December 17, 2019 meeting of the Royal Oak Rehabilitation Board of Appeals. The public hearing focused on obtaining citizen's views on housing and community development needs in the development of the PY2020 Annual Action Plan during the needs assessment stage of the process. No public comment was provided at the meeting. An additional public hearing was held at the January 28, 2020 meeting of the Royal Oak Rehabilitation Board of Appeals. Five individuals spoke regarding the application to fund improvements to the south end traffic diverters. The March 30, 2020 Royal Oak City Commission meeting included public comment however none was received with regard to the CDBG program. The City Commission authorized staff to submit the Annual Action Plan. The City allowed for a 30 day comment period prior to the submittal of the PY2020 Annual Action Plan.

The deadline to receive written comments was June 12, 2020. No written public comment was provided.

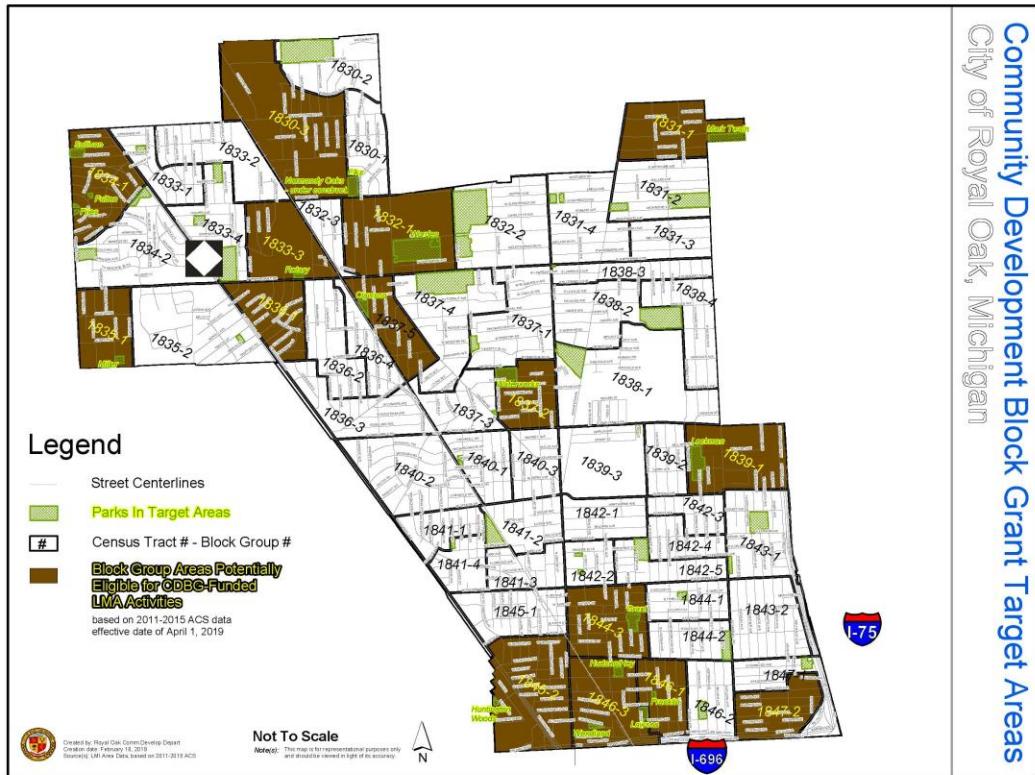
A public hearing was held at the March 22, 2021 meeting of the Royal Oak City Commission. The public hearing related to the proposed Substantial Amendments to the PY2020 Annual Action Plan. One (1) individual provided public comment for the city commission's consideration. He spoke in favor of the amendment to increase the dollar amount associated with improvements to Lawson Park & nearby traffic diverters. The City allowed for a 30 day comment period prior to the submittal of the PY2020 Annual Action Plan Substantial Amendment. The deadline to receive written comments was April 26, 2021. No written public comment was provided.

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

Not applicable. No public comments were provided. Therefore, this circumstance did not present itself.

7. Summary

The Annual Action Plan reflects the coordinated efforts of residents, volunteers, staff, elected officials, local public service agencies and private developers. This plan will help determine how federal funding and additional leveraged funding will be expended to address Royal Oak's community and housing priorities/needs under HUD's CDBG program.



CDBG target areas - low- to moderate-income block groups

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

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

The following are the agencies/entities 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		Community Development Department-Planning Division

Table 1 – Responsible Agencies

Narrative

The Planning Division of the City of Royal Oak's Community Development Department is responsible for overseeing the development of the consolidated plan. Staff has utilized several community planning initiatives to develop various components of the consolidated plan, including working with the City's Parks and Recreation Advisory Board, Rehabilitation Board of Appeals and City Commission, meeting with various county and local government representatives including members of the Oakland County HOME Consortium on many occasions. The City of Royal Oak also works with community organizations and various City departments to provide public services and facilities to address the City's objectives in carrying out the Consolidated Plan.

Consolidated Plan Public Contact Information

Joseph M. Murphy, Director of Planning

203 S Troy St

City of Royal Oak, Michigan 48067

P (248) 246-3285

E joem@romi.gov

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

1. Introduction

The planning division of the City of Royal Oak's Community Development Department, in cooperation with other government, non-profit and private agencies, Oakland County HOME Consortium members, and Oakland County's CoC, developed the five-year consolidated plan. A wide variety of nearly eighty (80) individual agencies, groups, and organizations were invited to participate in the process via consultation. The five-year consolidated plan allowed the city to develop its priority needs. The strategic plan provides an overview of why the city may spend CDBG program funds over the next five years to address its priority needs. During these five years, the city will focus its consultation efforts toward agencies and organizations that help the city address its priority needs. City staff will communicate and take funding applications from any service agency or organization. However, the city will expend its funds on its identified priorities.

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)).

Each year the local CoC hosts a community resource day. Over forty local service agencies are present to provide individuals in need with access to housing, employment, health screening, food and much more. This is the single largest gathering of cross discipline social services in Oakland County. Several years ago, the event has been hosted by a local religious institution. The facility was limited in its capacity and availability of parking. In 2016, city staff reached out to the CoC Director and offered the city's farmers' market for the event. The farmers' market is a much larger facility and has an abundance of parking. The event has been host at the market for the past 3 years. More recently, on November 7, 2018. The CoC did not host a community resource day in the fall of 2019. They instead hosted a homeless simulation day at a different venue.

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 is in regular communication with the director of the local CoC. This allows us to have one-on-one conversations to understand their efforts and assist in any way possible. The CoC and local service agencies are aware of the needs of homeless and at risk persons in the southeast portion of Oakland County. The CoC is charged with coordinating the HUD-required Point In Time (PIT) Count each January. Homeless and at risk individuals tend to be more concentrated in the Pontiac area and the southeast

portion of Oakland County. The PIT Count requires a facility for over 75 volunteers to gather before being deployed through this portion of the county. The city provides use of its farmers' market at no cost. Additionally, the CoC organizes a Community Resource Day each November. This event is attended by over forty local service agencies are present to provide individuals in need with access to housing, employment, health screening, food and much more. This is the single largest gathering of cross discipline social services in Oakland County. The city provides use of its farmers' market at no cost. City staff attends each of these events to see first hand the good work done by the CoC, service agencies and local volunteers.

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

Royal Oak does not receive ESG funds, but does provide feedback and assistance with the development of performance standards, evaluation, and development of policies and procedures when asked to provide input. During PY 2015 during the making of the upcoming consolidated plan, city staff met directly with local CoC, HMIS Administrator, and housing and supportive service providers on several occasions to become better informed on their efforts and the needs of their clients. Numerous agencies were provide notice of the city's community needs survey and availability of CDBG funds. As a result, the city developed precise community needs priorities/objectives to accomplish over the next five years. The city maintains on-going communication and consultation with housing and service providers.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Royal Oak
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services-Persons with Disabilities Other government - Local Grantee 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?	The City of Royal Oak's R.O.S.E.S. (Royal Oak Senior Essential Services) program was consulted to help determine the level of need for the service they provide to the community based on its prior relationship to the city's CDBG program. Additionally, they were invited to submit an application to receive CDBG funds to assist their efforts. There was no anticipated outcome prior to consultation.
2	Agency/Group/Organization	HAVEN
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	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?	This agency was consulted to help determine the level of need for the service they provide to the community based on its prior relationship to the city's CDBG program. Additionally, they were invited to submit an application to receive CDBG funds to assist their efforts. There was no anticipated outcome prior to consultation.
3	Agency/Group/Organization	LIGHTHOUSE COMMUNITY DEVELOPMENT
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	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?	This agency was consulted to help determine the level of need for the service they provide to the community based on its prior relationship to the city's CDBG program. Additionally, they were invited to submit an application to receive CDBG funds to assist their efforts. There was no anticipated outcome prior to consultation.
4	Agency/Group/Organization	South Oakland Citizens For The Homeless
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	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?	This agency was consulted to help determine the level of need for the service they provide to the community based on its prior relationship to the city's CDBG program. Additionally, they were invited to submit an application to receive CDBG funds to assist their efforts. There was no anticipated outcome prior to consultation.
5	Agency/Group/Organization	Alliance for Housing Oakland County Continuum of Care
	Agency/Group/Organization Type	Services-homeless

	<p>What section of the Plan was addressed by Consultation?</p> <p>Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy</p>
	<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>This agency was consulted to help determine the level of need for the service they provide to the community based on its prior relationship to the city's CDBG program. Additionally, they were invited to submit an application to receive CDBG funds to assist their efforts. There was no anticipated outcome prior to consultation.</p>
6	<p>Agency/Group/Organization</p> <p>OAKLAND COUNTY</p>
	<p>Agency/Group/Organization Type</p> <p>Other government - County</p>
	<p>What section of the Plan was addressed by Consultation?</p> <p>Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs</p>
	<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>This agency was consulted to help determine the level of need for the service they provide to the community based on its prior relationship to the city's CDBG program. Additionally, they were invited to submit an application to receive CDBG funds to assist their efforts. There was no anticipated outcome prior to consultation.</p>

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

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	Oakland County Alliance For Housing	The strategic plan identifies several priority needs which overlap with the CoC's mission to "bring together stakeholders from private and public sectors to collectively determine a strategy to end homelessness and increase the supply of sustainable, affordable housing. The following priority needs align: services for victims of domestic violence & sexual assault, mental health services, substance abuse services, transportation services, and operational costs of homeless assistance programs. The basis for the relative priority: According to the 2013 Annual State of Homelessness Report by the Alliance For Housing, 2013 HMIS data reveals that the top three reasons for homelessness for adults: eviction, domestic violence, and mental health issues. Assisting those in need with access to public services may reduce homelessness or rapidly re-house individuals.
Capital Improvement Plan	City of Royal Oak	The strategic plan identifies the need to improve parks and recreational facilities, infrastructure improvements in low- to moderate-income neighborhoods, conduct physical improvements to transportation corridors, and implement accessibility/barrier-free improvements to public facilities and transportation systems. Each year, as required by state law, the city reviews its capital improvement plan (CIP). The CIP facilities the orderly planning of infrastructure improvements; to maintain, preserve and protect the city's existing infrastructure system; and provide for the acquisition and scheduled replacement of equipment to ensure the efficient delivery of services that the community desires. Many of the yearly CDBG-funded projects are implemented based on the CIP.
Master Plan	City of Royal Oak	The strategic plan identifies the need to improve parks and recreational facilities, infrastructure improvements in low- to moderate-income neighborhoods, conduct physical improvements to transportation corridors, and implement accessibility/barrier-free improvements to public facilities and transportation systems. The Royal Oak Master Plan identifies goals, objectives and strategies related to eight issues/topics: neighborhood preservation & residential land use, historic resources, downtown, commercial corridors, Woodward corridor, transportation and circulation, parks and recreation uses, and community resources and facilities. Many of the yearly CDBG-funded projects are implemented based on the master plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Parks & Rec. Master Plan	City of Royal Oak	The strategic plan identifies the need to improve parks and recreational facilities. The city's parks and recreation master plan identifies park and recreation opportunities, conditions, needs, deficiencies, etc. Many of the yearly CDBG-funded projects are implemented based on the parks and recreation master plan.
HOME Consolidated Plan	Oakland County	The strategic plan identifies the need to fund housing rehabilitation projects. The HOME Consortium Plan focuses in large part on rehabilitating existing dwelling with HOME funds.

Table 3 - Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 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

While the City provided the opportunity for public participation during the development of the PY2020 Annual Action Plan, the City's goals have already been established in the Strategic Plan portion of the five-year Consolidate Plan. Any public comment during the development of the PY2020 Annual Action Plan would not have modified the goals. It did however determine activities and components of activities for PY2020. Staff and the City's Parks & Recreation Advisory Board invited solicited public comment on available options to improve Franklin Park, Lawson Park and nearby traffic diverters at the December 5, 2019 Board meeting. Staff identified the improvements as potential CDBG eligible activities for PY2020. All residents and property owners within 300 feet of each of these locations were mailed a postcard invitation. In total 425 postcards were mailed. At the meeting, staff presented the Board and the public with a brief history of these locations, their current condition, and potential options to improve these public assets. Twenty (20) individuals provided their input on available options for the parks and traffic diverters. The Royal Oak Parks & Recreation Advisory Board accepted their comments. At the Board's January meeting, it voted to recommend specific improvements for Franklin Park and Lawson Park based on public comment and the Board's input. The January meeting of the Parks & Recreation Advisory Board included public comment. Four (4) individuals spoke with regard to the potential improvements to the parks and traffic diverters. Staff developed estimated budgets based on the Board's recommended improvements. Staff presented the improvements to the parks and traffic diverters as one of the eligible CDBG activities for PY2020 to the City's Rehabilitation Board of Appeals which provides recommended activities and funding levels to the Royal Oak City Commission. The City provided two specific opportunities for public comment pertaining to the City's community development needs for the Annual Action Plan at the December 17, 2019 and January 28, 2020 Royal Oak Rehabilitation Board of Appeals' meetings. Notice of the December 17, 2019 public comment opportunity at the meeting was published on November 22, 2019 in The Daily Tribune and Oakland Press (local print newspapers) and posted to the CDBG webpage of the City's website. No public comment was provided at the December 17, 2019 meeting. Notice of the January 28, 2020 public comment opportunity at the meeting was published on January 17, 2020 in The Daily Tribune and Oakland Press (local print newspapers) and posted to the CDBG webpage of the City's website. Five (5) individuals spoke during public comment at the January 28, 2020 meeting. The Board accepted all comments and engaged in conversation with those providing public comment. The Royal Oak City Commission considered and finalized the PY2020 Annual Action Plan at its March 30, 2020 meeting. While this was not a public hearing, all Royal Oak City Commission meetings allow the opportunity for public comment. Notice of the 30 day comment period (June 12, 2020) was published in The Daily Tribune and Oakland Press, a local newspaper, and was posted to the CDBG webpage of the City's website on May 7, 2020. No written public comment were provided and therefore, none needed

to be incorporated into the Annual Action Plan.

At its March 22, 2021 meeting, the Royal Oak City Commission held a public hearing on a Substantial Amendment to the PY2020 Annual Action Plan. The Substantial Amendment modified funding levels for previously approved activities; no new activities. One (1) individual provided public comment for the city commission's consideration. He spoke in favor of the amendment to increase the dollar amount associated with improvements to Lawson Park & nearby traffic diverters.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	neighborhood specific - south central portion of the City	December 5, 2019 Royal Oak Parks & Recreation Advisory Board meeting to solicit public comment on potential improvements to six existing traffic diverts, Lawson Park & Franklin Park in the south central portion of the City. Twenty (20) individuals provided the Board with their comments.	Comments focused on potential improvement s to six existing traffic diverters, Lawson Park & Franklin Park.	Not applicable. All comments were received.	www.romi.gov/AgendaCenter/ViewFile/Agenda/_12052019-1751

2	Public Meeting	Non-targeted/broad community	January 9, 2020 Royal Oak Parks & Recreation Advisory Board meeting continued the discussion on potential improvements to six existing traffic diverts, Lawson Park & Franklin Park in the south central portion of the City. Four (4) individuals provided the Board with their comments under general public comment portion of the meeting.	Comments focused on potential improvements to six existing traffic diverters, Lawson Park & Franklin Park.	Not applicable. All comments were received.	www.romi.gov/AgendaCenter/ViewFile/Agenda/_01092020-1806
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3	Public Hearing	Non-targeted/broad community	December 17, 2019 Royal Oak Rehabilitation Board of Appeals meeting. A public hearing was held to obtain public comments pertaining to the City's community development needs for the PY2020 Annual Action Plan (July 1, 2020 - June 30, 2021). No one attended the public hearing. It should also be noted that the City held a public hearing on its updated Analysis of	None provided.	Not applicable.	www.romi.gov/AgendaCenter/ViewFile/Agenda/_12172019-1416 www.romi.gov/272/Public-Notices
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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)
			Impediments to Fair Housing at the same meeting.			
4	Public Hearing	Non-targeted/broad community	January 28, 2020 Royal Oak Rehabilitation Board of Appeals meeting. A public hearing was held to obtain public comments pertaining to the development of the City's PY2020 Annual Action Plan (July 1, 2020 - June 30, 2021).	Five (5) individuals spoke with regarding to the potential improvements to the traffic diverters, Lawson Park & Franklin Park.	Not applicable. All comments were received.	www.romi.gov/AgendaCenter/ViewFile/Agenda/_01282020-1793 www.romi.gov/272/Public-Notices

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)
5	Newspaper Ad	Non-targeted/broad community	Notice of the December 17, 2019 public comment opportunity at the meeting was published on November 22, 2019 in The Daily Tribune and Oakland Press (local print newspapers) and posted to the CDBG webpage of the City's website. No public comment was provided at the December 17, 2019 meeting.	Not applicable to a newspaper ad.	Not applicable to a newspaper ad.	

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	postcard invitation to public engagement opportunity	neighborhood specific - south central portion of the City	All residents and property owners within 300 feet of each of the traffic diverters, Lawson Park & Franklin Park were mailed a postcard invitation to provide their comments at the December 5, 2019 Parks & Recreation Advisory Board meeting. In total 425 postcards were mailed.	Not applicable.	Not applicable.	

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 Meeting	Non-targeted/broad community	March 30, 2020 meeting of the Royal Oak City Commission included public comment opportunity for anyone to speak on the PY20 Annual Action Plan.	None provided.	Not applicable.	https://www.romi.gov/AgendaCenter/ViewFile/Agenda/_03302020-1911
9	Internet Outreach	Non-targeted/broad community	Public notice regarding 30 day comment period was posted to the city's website on May 7, 2020 and published in a local newspaper (The Daily Tribune) on May 19, 2020.	None provided.	Not applicable.	https://www.romi.gov/272/Public-Notices

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	One (1) individual provided public comment. He provided his support to increase the funding amount to improvements at Lawson Park & nearby traffic diverters.	One (1) individual provided public comment. He provided his support to increase the funding amount to improvements at Lawson Park & nearby traffic diverters.	not applicable.	https://www.romi.gov/AgendaCenter/ViewFile/Agenda/_03222021-2217

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)
12	Newspaper Ad	Non-targeted/broad community	Notice of the March 22, 2021 public hearing on substantial amendments to the PY2020 Annual Action Plan was published on March 12, 2021 in The Daily Tribune and Oakland Press (local print newspapers) and posted to the CDBG webpage of the City's website.	not applicable.	not applicable.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

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Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,193,903	600,000	762,000	2,555,903	0	PY2020 is the last year in the Con Plan cycle.

Table 5 - Expected Resources – Priority Table

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

To receive CDBG funds from the City of Royal Oak, local organizations / agencies must provide an application and supplemental information

detailing their funding sources and leverage opportunities for specific activities. The City does not require that organizations / agencies provide "matching" non-CDBG or federal funds. The Royal Oak City Commission will weigh the value of the proposed activity in light of the goals of the City's Consolidated Plan and the likelihood that the activity would be implemented without the presence of CDBG funds. Subrecipient activities that would be implemented regardless of the City's CDBG allocation stand a greater likelihood of not being funded. Many of the public service subrecipients leverage a wide variety of funding sources. This is a standard practice. These organizations will not be penalized for this practice.

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

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Discussion

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Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Gain Access To Public Services	2016	2020	Homeless Non-Homeless Special Needs		in-home services:seniors, frail elderly & disabled operational costs of homeless assistance programs	CDBG: \$80,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted Homeless Person Overnight Shelter: 250 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 5 Beds
2	Improve Exit. Single-Family Homes & Affordability	2016	2020	Affordable Housing		housing rehab; single-family, owner-occupied	CDBG: \$600,000	Homeowner Housing Rehabilitated: 35 Household Housing Unit
3	Improve Public Facilities & Infrastructure	2016	2020	Non-Housing Community Development		improvements at parks and recreation facilities facilities & infrastructure improv within LMAs	CDBG: \$1,100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 710 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Gain Access To Public Services
	Goal Description	<p>The City of Royal Oak's Recreation Department operates the R.O.S.E.S. (Royal Oak Senior Essential Services) program. ROSES is a program providing a variety of supportive services to Royal Oak residents age 62 years of age or older. Contracted individuals provide home chores (lawn mowing, leave removal, snow removal, exterior cleaning, house cleaning, etc), minor home repair (minor plumbing, electrical, and carpentry tasks that do not require a licensed contractor), and personal home care (assistance with daily living activities such as bathing, meals, shampoos, dressing, etc.). Low and moderate income residents qualify for a subsidized hourly rate. CDBG fund are expended to complete the subsidy. The South Oakland Citizens For The Homeless (SOCH) operates the Welcome Inn at Star Presbyterian Church in Royal Oak at the intersection of Crooks Rd. and 13 Mile Rd. Welcome Inn is the day-time companion piece to the 14-week winter night-time shelter program operated by various religious institutions in Royal Oak and adjacent communities. Services are extended to homeless adults that are no/low income, unemployed/underemployed, disabled, abuse victims, and/or suffering mental health issues or chemical dependency. Professional and volunteer support services will address the emergent needs of the homeless and help guide them towards independent living. CDBG funds will be expended to subsidize the operation costs of this homeless assistance program. Lighthouse of Oakland County provides assistance to homeless individuals with a last known address in Royal Oak or at-risk Royal Oak residents. This program is designed to utilize case management services for individual clients to gain access to jobs & financial education training, food, transportation and lodging. CDBG funds will be expended to subsidize the operation costs of this homeless and at-risk assistance program.</p>
2	Goal Name	Improve Exit. Single-Family Homes & Affordability
	Goal Description	<p>CDBG funds will be utilized to operate the City's single-family housing rehabilitation program for any low to moderate income resident homeowner within the City of Royal Oak. The full service program provides technical and financial assistance. The program is designed to restore and upgrade the City's existing single-family housing stock, preserve neighborhoods city-wide, implement energy efficiency measures, develop safe, decent and accessible housing, and create an affordable housing option.</p>

3	Goal Name	Improve Public Facilities & Infrastructure
	Goal Description	CDBG funds will be expended to enhance the landscaping of six traffic diverters / berms in the south central portion of the City. CDBG funds will also be expended to conduct numerous physical improvements to nearby parks: Lawson Park & Franklin Park.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The Royal Oak City Commission considered and approved the submittal of the Annual Action Plan at its March 30, 2020 meeting. The 30 day comment period expired on June 12, 2020.

The Royal Oak City Commission approved a Substantial Amendment to the PY2020 Annual Action Plan at its March 22, 2021 meeting. The 30 day comment period expired on April 26, 2021. The amendment modified funding amounts to previous approve activities; no new activities.

#	Project Name
1	R.O.S.E.S. - supportive services
2	homeless services - South Oakland Citizens For The Homeless
3	homeless services - Lighthouse
4	housing rehabilitation program - owner rehabilitation assistance
5	south end traffic diverters & Lawson Park
6	program administration

Table 7 – Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	R.O.S.E.S. - supportive services
	Target Area	
	Goals Supported	Gain Access To Public Services
	Needs Addressed	in-home services:seniors, frail elderly & disabled
	Funding	CDBG: \$10,000
	Description	CDBG funds will be expended on supportive services for elderly, income qualified Royal Oak residents. The Royal Oak Senior Essential Services (R.O.S.E.S.) program is organized by staff at the City-owned senior center. Contracted workers perform subsidized home chores, minor repairs, and personal care assistance for income qualified residents. Home chores include household tasks such as snow shoveling, lawn mowing, yard work, etc. Home repairs, which do not require a licensed contractor, include minor plumbing, carpentry, and electrical work. Personal care may include assistance with activities of daily living. The PY2020 Annual Action Plan Substantial Amendment reduces the budget from \$45,000 to \$10,000. Fewer households are participating in the program due to COVID-19.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	100 elderly residents
	Location Description	At individual residences.
	Planned Activities	Home chores include household tasks such as snow shoveling, lawn mowing, yard work, etc. Home repairs, which do not require a licensed contractors, include minor pluming, carpentry, and electrical work. Personal care may include assistance with activities of daily living.
2	Project Name	homeless services - South Oakland Citizens For The Homeless
	Target Area	
	Goals Supported	Gain Access To Public Services
	Needs Addressed	operational costs of homeless assistance programs
	Funding	CDBG: \$15,000

	Description	The SOCH operates the Welcome Inn Day Center at Star Presbyterian Church (1717 W 13 Mile Rd). Its mission: "Welcome Inn and its partners will offer professional and volunteer support services that will address the emergent needs of its community's homeless and help guide them towards independent living". SOCH operates the daytime "companion piece" to the overnight homeless shelter locations operated by various religious institutions in and around Royal Oak during a 14-week winter month period. It provides the following services at Starr Presbyterian Church: day-time shelter, meals, clothing, basic health screenings and hygiene care, on-site case management connecting individuals to a variety of social service provided by partner agencies such as Lighthouse, Community Housing Network, US Department of Veteran's administration, Oakland University's School of Nursing, YMCA, etc. Funds will assist their operational efforts such as staff costs, rent, insurance, tangible components such as food, clothing, cleaning supplies, fuel, etc. SOCH's program does not provide temporary or permanent housing. The PY2020 Annual Action Plan Substantial Amendment does not modify this activity's budget.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	50
	Location Description	1717 W 13 Mile Rd, Royal Oak MI 48073
	Planned Activities	day-time shelter, meals, clothing, basic health screenings and hygiene care, on-site case management connecting individuals to a variety of social service
3	Project Name	homeless services - Lighthouse
	Target Area	
	Goals Supported	Gain Access To Public Services
	Needs Addressed	operational costs of homeless assistance programs
	Funding	CDBG: \$20,000

	Description	The Lighthouse provides a wide array of services designed to permanently remove individuals and families from the cycle of homelessness. CDBG funds will be utilized to reimburse Lighthouse for services provided in its emergency shelter program. The program is designed to utilize case management services for individual clients to gain access to job and financial education training, food, transportation and lodging. It will provide emergency services to those experiencing homelessness with a last known address of Royal Oak coupled with case management. The PY2020 Annual Action Plan Substantial Amendment does not modify the funding amount for this previously approved activity.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	50
	Location Description	not applicable
	Planned Activities	The program is designed to utilize case management services for individual clients to gain access to job and financial education training, food, transportation and lodging. It will provide emergency services to those experiencing homelessness with a last known address of Royal Oak coupled with case management.
4	Project Name	housing rehabilitation program - owner rehabilitation assistance
	Target Area	
	Goals Supported	Improve Exit. Single-Family Homes & Affordability
	Needs Addressed	housing rehab; single-family, owner-occupied
	Funding	CDBG: \$600,000
	Description	A City administered program to provide technical and financial assistance to low- and moderate-income residents of the City to rehabilitate owner-occupied single family houses on a city-wide basis. The PY2020 Annual Action Plan Substantial Amendment does not modify the budget amount for this previously approved activity.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	35
	Location Description	At individual residences.
	Planned Activities	Renovation of single-family dwellings.
5	Project Name	south end traffic diverters & Lawson Park
	Target Area	
	Goals Supported	Improve Public Facilities & Infrastructure
	Needs Addressed	improvements at parks and recreation facilities
	Funding	CDBG: \$1,710,903
	Description	<p>CDBG funds will be expended to improve the six traffic diverter locations and nearby public park(s) in the southcentral portion of the City. The traffic diverters have been in existence since the late 1970s. Many have fallen into disrepair. CDBG funds will be utilized to refurbish the landscaping in an effort to continue their purpose and viability. Nearby Lawson Park contains deteriorating recreational facilities. Based on public input from the immediate neighborhood and the recommendation of the Parks & Recreation Advisory Board, CDBG funds will be expended to vastly improve the neighborhood park with such features as new playground equipment for children over 5 years of age, outdoor fitness equipment, reconditioned baseball field, new basketball court, park shelter, benches, bicycle racks, outdoor grills, etc. Franklin Park facilities are in extreme disrepair and would be entirely removed. Based on public input from the immediate neighborhood and the recommendation of the Parks & Recreation Advisory Board, CDBG funds would be expended to construct a new tennis court, purchase and install new playground equipment for children under 5 years of age, implement drainage improvements to the park, and plant trees. Depending upon the bid responses, the city will prioritize the south end improvements in the following order: traffic diverters, Lawson Park, Franklin Park. Any of the south end improvements not accomplished during PY 2020-2021 will be given priority for the following program year. The PY2020 Annual Action Plan Substantial Amendment eliminates Franklin Park from the scope of work & increases the budget from \$1,100,000 to \$1,710,903. The March 9, 2021 bid opening for the activity revealed higher than expected bid prices.</p>

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Census Tract 1846, Block Group 3 has 285 LMI persons + Census Track, Block Group 1 has 425 LMI persons = 710 total LMI persons
	Location Description	Census Tract 1846, Block Group 3 + Census Track, Block Group 1
	Planned Activities	see above descripion
6	Project Name	program administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$200,000
	Description	Program administration funds continue to allow the proper oversight of projects and compliance with HUD regulations. The PY2020 Annual Action Plan Substantial Amendment does not modify the funding amount for this previously approved activity.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

No geographic areas indentified.

Geographic Distribution

Target Area	Percentage of Funds
City of Royal Oak	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

-

Discussion

-

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

As of February 21, 2020, the Royal Oak Planning Commission has not suggested holding a public hearing on any potential Zoning Ordinance amendments. Below is recent activity regarding actions that may result in additional affordable housing options.

At its August 13, 2019 regular meeting, the Royal Oak Planning Commission reviewed a staff report on current density, parking and design standards for multiple-family dwellings required under the City's Zoning Ordinance. The staff memorandum can be found online at: <https://www.romi.gov/DocumentCenter/View/24522/D3b---MFR-Lot-Size-Density-Parking> It outlined various issues created by the existing standards and referenced possible revisions to the Zoning Ordinance that could potentially address them including the following:

- *Reducing minimum required lot sizes for two-family and multiple-family dwellings.*
- *Reducing minimum required side yard setbacks for multiple-family dwellings and modifying other setbacks to be consistent with those required in other zoning districts.*
- *Eliminating minimum lot sizes and density bonuses for multiple-family projects in mixed-use zoning.*
- *Requiring features for multiple-family projects in mixed-use zoning that have densities exceeding the minimum lot area formula, i.e., green infrastructure, sustainable building practices, affordable housing, etc.*
- *Increasing maximum permitted building heights to allow three-story buildings with taller ground floors.*
- *Eliminating the need for greater setbacks to allow more building height in mixed-use zoning.*
- *Requiring setbacks in mixed-use zoning only when property is adjacent to specific single-family zoning districts.*
- *Modifying required setbacks in mixed-use zoning to be consistent with those required in commercial zoning.*
- *Eliminating separate setbacks for buildings with only residential uses in mixed-use zoning.*
- *Specifying that buildings with parking as a portion of their ground level street frontage are allowed only as a special land use in mixed-*

use zoning.

- *Allowing more types of multiple-family dwellings as permitted uses in commercial zoning districts.*
- *Updating design standards for multiple-family dwellings.*
- *Reducing required parking for multiple-family dwellings.*

Based on the Royal Oak Planning Commission's input at that meeting staff prepared zoning ordinance text amendments for consideration to address the issues identified in the report. A memorandum highlighting potential Zoning Ordinance text amendments was presented and discussed at the January 14, 2020 meeting of the Royal Oak Planning Commission. The memorandum can be found online at: <https://www.romi.gov/DocumentCenter/View/25745/E2---Prelim-Review-of-Potential-Text-Amendments---Lot-Size-Density-Parking-Other-for-MFR>

The topic was scheduled for the March 18, 2020 Royal Oak Planning Commission however the agenda was cancelled due to the onset of the coronavirus. The memorandum to the Planning Commission can be found online at <https://www.romi.gov/DocumentCenter/View/26192/E1---Prelim-Review-of-Potential-Text-Amendments---Lot-Size-Density-Parking-Other-for-MFR> The Planning Commission has been deemed non-essential and their April and May 2020 meetings have also been cancelled.

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

At its January 27, 2020 meeting, the Royal Oak City Commission adopted a resolution accepting and affirming the findings and recommendations of the City's Analysis of Impediments to Fair Housing - 2020 Update. Below are key impediments and recommended actions specific to housing

Impediment: Possible regulatory constraints to the construction of the market demand for different housing formats.

Recommendation: The City's 2017 housing Target Market Analysis (TMA) identified that 52% of new households moving to the City are inclined to choose a building format with at least 3 or more dwelling units. The City of Royal Oak should implement the Royal Oak City Commission's recent goal to encourage and support desirable housing by:

- researching and potentially modifying local regulations that may help facilitate housing developments that meet the "gaps" identified in the

TMA; and

- researching and potentially implementing local regulations intended to incentivize the construction of new moderately-priced housing in mixed-income settings that would exceed baseline development standards.

Impediment: Availability of affordable housing options for low-income households in proximity to public transit options.

Recommendation: The City of Royal Oak should implement the strategies of the 2012 Master Plan: - ensure multiple-family developments locate along or near public transit corridors; - encourage those that adhere to transit-oriented design principles; - achieve regional transportation capacity through appropriate methods and multiple travel nodes, such as network connectivity and properly-sized thoroughfares, instead of widening lanes and adding more lanes.

The Royal Oak Planning Commission will continue its review and discussion on mulitple-family development standards in the City's Zoning Ordinance. Any potential progress to amend the city's Zoning Ordinance will be reported in the City's CDBG CAPER - year-end report.

Discussion

See above paragraphs.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

The City of Royal Oak will engage in a wide variety of activities intended to address the identified needs in the Strategic Plan.

Actions planned to address obstacles to meeting underserved needs

The underserved may include special need individuals, minority concentrations, those experiencing homelessness or those at-risk of becoming homeless, victims of domestic violence or sexual assault, returning veterans, the frail and elderly, large families, etc. The City will allocate CDBG funds to its at-home senior assistance program (ROSES). CDBG funds will be provided to Lighthouse of Oakland County which assists those experiencing homelessness or those at-risk of becoming homeless. CDBG funds will also be provided to the South Oakland Citizens For The Homeless for their operational costs of the Welcome Inn day-time shelter during the 14 week winter period at a facility within the city limits. The City's CDBG-funded housing rehabilitation program will provide a direct mailer about the availability of the program to all homeowners within the census track with the highest percentage of minor homeowners. The City will continue to work with the local CoC to utilize the City's Farmers' Market as a deployment center for volunteers and PIT County coordinators in January 2021. Staff will also work with the CoC to encourage their return to the Farmers' Market for a fall 2020 Community Resource Day which provides a wide variety of social services for low-income individuals in need.

Actions planned to foster and maintain affordable housing

The City plans to preserve and increase the supply of affordable owner-occupied and renter-occupied housing for low- to moderate-income residents through CDBG-funded housing rehabilitation and new construction, advocacy, policies and regulations. The housing rehabilitation program offers low and no interest loans for renovations to single-family houses. These low or no cost financial options make it more affordable for homeowners to protect their investment and maintain affordable living conditions. Additionally, the City participates in the Oakland County HOME Consortium. The Consortium has greater direction on how its proportional HOME funds are expended on projects within Oakland County versus the state administered program which invested our proportional funds state-wide.

Actions planned to reduce lead-based paint hazards

The City operates a CDBG-funded housing rehabilitation program (owner-occupied single-family

dwellings). The program has specific procedures which outline the steps required to educate, test, contain and/or remediate LBP. All rehabilitation projects in which the structure was constructed before 1978 fall under the Federal LBP regulations. A lead hazard information pamphlet is provided to all prospective participants in the housing rehabilitation program, regardless of age of the structure. If the structure was built before 1978, a LBP risk assessment is conducted. The results are provided to the applicant. The finds are incorporated into the specifications for the rehabilitation work. All of the contractors participating in the City's housing rehabilitation program must present and maintain status as a LBP certified contractor. The risk assessment determines the degree of rehabilitation work needed to gain compliance with Federal LBP regulations and provide LBP-free living environment to all homeowners. Occupants may not be present during any site work. Once the contractor has completed all site work, a LBP clearance test is conducted. The results of the clearance test are provided to the homeowner. No occupant may return to the dwelling unit until the site gains clearance. All public service subrecipients that provide housing assistance in any manner must verify that the associated housing unit has been inspected and meets HUD's minimum required Housing Quality Standards (HQS) inspection, requirements including the provisions regarding LBP. Any dwelling unit that does not meet HUD's HQS standards must be brought into compliance. These actions educate the public of the danger of LBP, ensure compliance with Federal regulations to address the presence of LBP, and provide a LBP-free living environment for all occupants upon completion of all site work.

Actions planned to reduce the number of poverty-level families

The City plans to fund its housing rehabilitation program. The City believes poverty-level families will financially and emotionally benefit greatly from livable single-family homes. A stable living arrangement can lead to great economic stability and upward economic mobility. The City actively seeks Section 3 (low-income residents or businesses) in every CDBG-funded project. The selection of Section 3 firms provides economic gain to poverty-level families.

Actions planned to develop institutional structure

The City relies on existing agencies to assist its residents with access to a wide variety of public services. All of the City's CDBG subrecipients are required utilize HMIS. This creates a seamless information system to assist clients in need that may utilize different agencies for different services. The information system helps reduce redundant institutional efforts and keep clients on track with their own case management efforts.

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

The City's continued participation in the Oakland County HOME Consortium greatly strengthens its

knowledge of and access to the Continuum of Care, other HUD-funded levels of government within Oakland County, and a broader network of social service agencies. Regular meetings and networking strengthen our knowledge of the local needs and the institutional structure to deliver results.

Discussion

-

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

Introduction

-

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
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Discussion

PY2020 is the start of a new 3 year cycle (PY2020, PY2021, PY2022).

Attachments

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C * Other (Specify): <input type="text"/>	
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>		
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>	
State Use Only:			
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>		
8. APPLICANT INFORMATION:			
* a. Legal Name: <input type="text"/> City of Royal Oak			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text"/> 38-6004646		* c. Organizational DUNS: <input type="text"/> 0698198450000	
d. Address:			
* Street1: <input type="text"/> 203 S Troy St	Street2: <input type="text"/>		
* City: <input type="text"/> Royal Oak	County/Parish: <input type="text"/>		
* State: <input type="text"/> MI: Michigan	Province: <input type="text"/>		
* Country: <input type="text"/> USA: UNITED STATES			
* Zip / Postal Code: <input type="text"/> 48067-2740			
e. Organizational Unit:			
Department Name: <input type="text"/> Community Development Depart	Division Name: <input type="text"/> Planning Division		
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix: <input type="text"/> Mr	* First Name: <input type="text"/> Joseph		
Middle Name: <input type="text"/> M			
* Last Name: <input type="text"/> Murphy			
Suffix: <input type="text"/>			
Title: <input type="text"/> Director of Planning			
Organizational Affiliation: <input type="text"/> City of Royal Oak			
* Telephone Number: <input type="text"/> (248) 246-3285		Fax Number: <input type="text"/> (248) 246-3005	
* Email: <input type="text"/> joem@romi.gov			

Application for Federal Assistance SF-424*** 9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:****11. Catalog of Federal Domestic Assistance Number:**

CFDA Title:

*** 12. Funding Opportunity Number:**

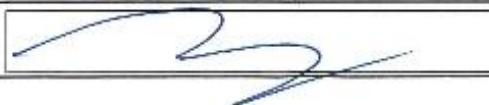
* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):*** 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.

Application for Federal Assistance SF-424			
16. Congressional Districts Of:			
*a. Applicant	<input type="text" value="12"/>		
*b. Program/Project			
<input type="text" value="12"/>			
Attach an additional list of Program/Project Congressional Districts if needed.			
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>			
17. Proposed Project:			
*a. Start Date:	<input type="text" value="01/01/2020"/>		
*b. End Date: <input type="text" value="06/30/2021"/>			
18. Estimated Funding (\$):			
*a. Federal	<input type="text" value="1,193,903.00"/>		
*b. Applicant	<input type="text" value="0.00"/>		
*c. State	<input type="text" value="0.00"/>		
*d. Local	<input type="text" value="0.00"/>		
*e. Other	<input type="text" value="762,000.00"/>		
*f. Program Income	<input type="text" value="350,000.00"/>		
*g. TOTAL	<input type="text" value="2,305,903.00"/>		
19. Is Application Subject to Review By State Under Executive Order 12372 Process?			
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.			
20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", provide explanation and attach			
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>			
21. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 21, Section 1001)			
<input checked="" type="checkbox"/> ** I AGREE			
** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.			
Authorized Representative:			
Prefix:	<input type="text" value="Mr."/>	*First Name:	<input type="text" value="Michael"/>
Middle Name:	<input type="text" value="C."/>		
*Last Name:	<input type="text" value="Fournier"/>		
Suffix:	<input type="text"/>		
*Title:	<input type="text" value="Nayor"/>		
*Telephone Number:	<input type="text" value="1248) 246-3285"/>	Fax Number:	<input type="text"/>
*Email:	<input type="text" value="mfournier@xcon1.gov"/>		
* Signature of Authorized Representative:			
		* Date Signed: <input type="text" value="11/11/2020"/>	

CERTIFICATIONS

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

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

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

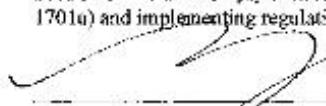
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

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

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

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


Signature of Authorized Official

06/17/2020
Date

MAYOR

Title

Specific Community Development Block Grant Certifications

The Fulfillment Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2020, 2021, 2022 (a period specified by the grantee of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

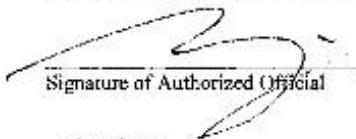
Excessive Force -- It has adopted and is enforcing:

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

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

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

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


Signature of Authorized Official

06/17/2020
Date

MAYOR
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION

Lobbying Certification

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

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0340), Washington, DC 20503.

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

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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§55101-5107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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8. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §§276a and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
9. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurance construction and acquisition is \$10,000 or more.
10. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of vibrating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to States (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
11. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
12. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
13. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
14. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended; 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm-blooded animals held for research, teaching, or other activities supported by this award of assistance.
15. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§14801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
16. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
17. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
18. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED-CERTIFYING OFFICIAL		TITLE	
		Mayor	
APPLICANT ORGANIZATION		DATE SUBMITTED	
City of Royal Oak, Michigan		04/16/2020	

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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0919
Expiration Date: 02/28/2022

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

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to ensure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the completed work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4783) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of resource structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1881-1883, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§5223 and 527 of the Public Health Service Act of 1972 (42 U.S.C. §§290 dd 3 and 290 ee 3); as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.); as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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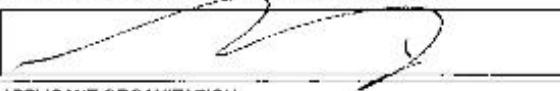
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-648) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in this program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11980; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1965, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-206).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audit of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. §7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		Mayor	
APPLICANT ORGANIZATION		DATE SUBMITTED	
City of Royal Oak, Michigan		05/18/2020	

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