



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT  
DETROIT FIELD OFFICE  
477 MICHIGAN AVENUE, STE. 1600  
DETROIT, MI 48226-2592  
DetroitCPD@hud.gov

September 22, 2022

Joseph M. Murphy  
Director of Planning  
Community Development Department  
211 Williams Street  
Royal Oak, MI 48067

SUBJECT: Grant Agreement Transmittal

Dear Joseph Murphy:

The Detroit Field Office would like to thank you for your continued partnership in providing quality affordable housing, a suitable living environment, and expanding economic opportunities for low-and moderate-income persons through HUD programs. On Thursday, June 10, 2021, the Department published an interim final rule with a request for comments, titled: *Requesting Affirmatively Furthering Fair Housing Definitions and Certifications* (86 Fed Reg 30779). The effective date for the interim rule is July 31, 2021, and you are encouraged to review the interim rule in developing your programs.

One Grant Agreement is attached for each program awarded as follows:

Community Development Block Grant Program (CDBG)	\$ 1,167,524
<b>Total FY2022 Award</b>	<b>\$ 1,167,524</b>

Transmittal of a Grant Agreement does not constitute approval of the activities described in your Consolidated Plan. You are reminded that you, as grantee, are responsible for ensuring that all grant funds are used in accordance with all program requirements. An executed Grant Agreement is a legally binding agreement between the Department of Housing and Urban Development and your agency.

To establish a Line of Credit for Fiscal Year 2022 grants, it will be necessary for your agency to sign, execute and return one (1) copy of the Grant Agreements. If there is a need to add or remove individuals authorized to access the Integrated Disbursement Information System (IDIS), please submit an IDIS Online Access Request Form (HUD 27055), notarize, and return to this office. Additionally, if there is a need to establish or change the depository account where these funds are to be wired, a Direct Deposit Sign-Up form (SF-1199A) must be completed by your financial institution and returned to this office with a copy of a voided check.

Please note the special condition in your CDBG Funding Approval/Agreement.

You are reminded that certain activities are subject to the provisions of 24 CFR Part 58 (Environmental Review Procedures). Funds for such activities may not be obligated or expended until HUD has approved the release of funds in writing. A request for release of funds (RROF) must be accompanied by an environmental certification, and until the RROF is approved and notification is received, no HUD funds should be committed. If the project or activity is exempt per 24 CFR 58.34 or categorically excluded (except in extraordinary circumstances), no RROF is required.

On November 15, 2021, the Build America, Buy America Act (the Act) was enacted as part of the Infrastructure Investment and Jobs Act (IIJA). Pub. L. 117-58. The Act establishes a domestic content procurement preference, the BAP, for Federal programs that permit Federal financial assistance to be used for infrastructure projects. In Section 70912, the Act further defines a project to include “the construction, alteration, maintenance, or repair of infrastructure in the United States” and includes within the definition of infrastructure those items traditionally included along with buildings and real property. Starting May 14, 2022, new awards of Federal financial assistance from a program for infrastructure, and any of those funds obligated by the grantee, are covered under the Build America, Buy America (BABA) provisions of the Act, 41 U.S.C. 8301 note. While HUD currently has a waiver of the application of the BAP through HUD’s Notice, “General Applicability Waiver of Build America, Buy America Provisions as Applied to Recipients of HUD Federal Financial Assistance” (87 FR 26219), HUD will begin requiring compliance with BAP for all new funds obligated on or after November 14, 2022, unless covered by a subsequent waiver. Additional details on fulfilling the BABA requirements can be found at [https://www.hud.gov/program\\_offices/general\\_counsel/BABA](https://www.hud.gov/program_offices/general_counsel/BABA) and will be provided by HUD prior to the expiration of the waiver and full implementation of BABA.

In response to COVID-19, HUD authorizes you to electronically execute the grant agreement with your electronic signature. Please execute each attached Funding Approval and/or Grant Agreement with electronic signature and return a digital copy of each approval/agreement via email to [DetroitCPD@hud.gov](mailto:DetroitCPD@hud.gov) with a Cc to your CPD Representative Darrick Mallad ([Darrick.T.Mallad@hud.gov](mailto:Darrick.T.Mallad@hud.gov)) and Financial Analyst Cindy Vails ([Cynthia.C.Vails@hud.gov](mailto:Cynthia.C.Vails@hud.gov)). Please ensure the Chief Elected Official and/or authorized designee signs the CDBG Grant Agreement in the box directly across from the HUD CPD Director’s signature. The CDBG Grant Agreement should **not** be signed in box 12c. Maintain a copy of each agreement with your electronic signature on-site in your program files.

For additional information and guidance on grant-based accounting, please refer to the HUD Exchange at: <https://www.hudexchange.info/manage-a-program/grant-based-accounting/>.

HUD congratulates the City of Royal Oak on your grant award, and we look forward to assisting you in accomplishing your programs goals. If you have any questions or need further information or assistance, please contact Darrick Mallad CPD Representative at (313) 234-7328 or [Darrick.T.Mallad@hud.gov](mailto:Darrick.T.Mallad@hud.gov).

Sincerely,

Keith E. Hernández, AICP, PMP  
Director  
Office of Community Planning and Development

Enclosures

## **Executive Summary**

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

#### **1. Introduction**

The City of Royal Oak's CDBG objective is to address the housing, non-housing and community development needs of the low- to moderate-income residents by taking advantage of opportunities to ensure decent and affordable housing, a suitable living environment and where applicable, expand economic development opportunities. This document will govern the CDBG-funded activities and initiatives, and how they achieve these objectives, for PY2022 (July 1, 2022 - June 30, 2023).

## 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 in the PY2021 - PY2025 Consolidated Plan:

### Housing

#### *Affordable Owner-Occupied & Renter-Occupied Housing*

To preserve and increase the supply of affordable owner-occupied and renter-occupied housing for low- to moderate-income 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

#### *Immediate Shelter Needs of the Homeless*

To support the immediate, temporary shelter needs of those experiencing homelessness.

#### *Public Services That Benefit the Homeless*

To support public services that help those experiencing homelessness so they may immediately seek a more stable setting and gain access to network of services to achieve self-sufficiency.

### Non-Homeless Special Needs

#### *Public Services That Benefit Special Needs Population*

To support and facilitate access to the wide variety of existing public services that may enhance life skills and self-sufficiency.

### Neighborhood Investment

#### *Public Improvements & Facilities*

To create new or improved public facilities and infrastructure in CDBG Target Areas by identifying, designing, and implementing unique projects.

### *Redevelopment of Blighted Properties*

To eliminate individual instances of blight and create economic job opportunities and/or below market rate multiple-family housing.

### Response To COVID-19 (specific to the receipt of a special allocation of CDBG funds)

#### *Emergency Food Distribution*

To purchase and distribute free food to low- to moderate-income residents that can no longer afford food due to financial circumstances created by COVID-19.

#### *Hotel Vouchers In Lieu Of Shelter Closures*

To provide no more than six (6) months of hotel, food, and case management allowances, per HUD regulations, to recently displaced Royal Oak residents who are unable to utilize a central shelter facility due to social distancing measures created by COVID-19.

#### *Rent/Mortgage/Utility Assistance*

To provide no more than six (6) months of financial assistance, per HUD regulations, to low- and moderate-income renter- and owner-occupied households who are at-risk of eviction, foreclosure, or disconnection of electrical and natural gas services due to financial circumstances created by COVID-19.

#### *COVID-19 Testing*

To provide free COVID-19 diagnostic (antigen and PCR confirmation) testing to any individual living in low- and moderate-income household. The program will benefit those living and working within the city limits that do not have health insurance or the insurance plan will not cover the testing expense.

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

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

Staff recommends policies and funding allocations based on past performances. Below are just a few examples.

Single-family homes represent approximately 62% of the city's total land uses. The overwhelming majority (63.3%) 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 low- to moderate-income single-family homeowners maintain and renovate their homes. The program is designed to provide no, and low interest loans and forgivable loans for rehabilitation projects. It ensures affordability and preserves the aging housing stock. It's 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 Housing of Urban Development (HUD)'s timeliness of expenditure requirements, Royal Oak believes that these types of projects will have a larger impact on a corridor or neighborhood versus small scale projects spread across the entire city each program 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 within the corridor. Upon completion of the large infrastructure project, developers began to approach the city to purchase and redevelop the once blighted property. The property has been sold to a developer who has approval to build a new concept of small-scale apartments. While this type of living environment is underway in other metropolitan areas around the country, no other developer in the metro Detroit area has embarked on such an endeavor. The developer specifically selected the property and type 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.

On November 4, 2021, staff mailed postcard notices to 59 service agencies, religious institutions, adjacent communities, county government agencies, senior housing developments, etc. The postcard provided notice of the process to submit an application for funding to help the city address its priority needs.

The Royal Oak Rehabilitation Board of Appeals, in its advisory role for the CDBG program, held public hearings at its October 26, 2021 & April 26, 2022 meetings. No one spoke at either meeting. The board also discussed the activities and funding levels at its May 24, 2022 meeting. Each meeting includes general public comment. No one spoke at the meeting.

The Royal Oak City Commission considered the PY2022 Annual Action Plan at its June 13, 2022 meeting. No public comment was provided. The 30-day comment period notice was published in the June 17, 2022 print edition of The Daily Tribune (local newspaper). It was also posted to the city's website on June 16, 2022. No public comment was provided during the 30 day window prior to submittal.



**AFFIDAVIT OF PUBLICATION**  
2125 Butterfield Dr, Suite 102N • Troy MI 48064

City of Royal Oak Planning Dept.  
211 Williams Street

Royal Oak, MI 48068  
Attention: Joseph M. Murphy

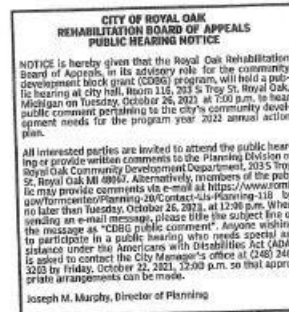
STATE OF MICHIGAN,  
COUNTY OF OAKLAND

The undersigned Cynthia Slater Apple, Slater, being duly sworn the he/she is the principal clerk of Royal Oak Tribune, Oakland Press, theoaklandpress.com, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

City of Royal Oak Planning Dept.

Published in the following edition(s):

Oakland Press	10/10/21
theoaklandpress.com	10/10/21
Royal Oak Tribune	10/10/21



Sworn to the subscribed before me this 13 Oct, 2021

Vicki Arsenault  
Notary Public, State of Michigan  
Acting in Oakland County

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**Affidavit - 10-26-2021 Public Hearing**



**AFFIDAVIT OF PUBLICATION**  
2125 Butterfield Dr, Suite 102N • Troy MI 48084

City of Royal Oak  
203 S. TROY

ROYAL OAK, MI 48067  
Attention: Joseph Murphy

**STATE OF MICHIGAN,  
COUNTY OF OAKLAND**

The undersigned Cindy Slater, being duly sworn the he/she is the principal clerk of Royal Oak Tribune, Oakland Press, theoaklandpress.com, theoaklandpress.com2, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

**City of Royal Oak**

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VICKI ARSENAULT  
NOTARY PUBLIC - STATE OF MICHIGAN  
COUNTY OF OAKLAND  
My Commission Expires May 11, 2026  
Acting in the County of \_\_\_\_\_

Sworn to the subscribed before me this 7 April, 2022

Vicki Arsenault  
Notary Public, State of Michigan  
Acting in Oakland County

**Advertisement Information**

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**CITY OF ROYAL OAK  
PUBLIC HEARING NOTICE**

The City of Royal Oak estimates the receipt of \$1,195,918 of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing & Urban Development (HUD) for PY2022 (July 1, 2022 – June 30, 2023). HUD has not yet released exact funding allocation amounts. Any change in funding allocation amount will require an adjustment to the program's overall contingency fund.

Notice is hereby given that the Royal Oak Rehabilitation Board of Appeals, in its advisory role for the CDBG program, will hold a regular meeting on Tuesday, April 26, 2022, at 7:00 p.m. in Room 122, City Hall, 203 S. Troy St., Royal Oak, Michigan, to hear public comments pertaining to the development of the city's PY2022 CDBG Annual Action Plan. On April 12, 2022, a draft version of the document may be found on the city's website at: <https://www.romi.gov/280/Application-Documents>. Its also available for viewing at the planning division of the city's community development department.

Individuals may present their comments at the meeting, or by e-mail at joem@romi.gov, or by mail addressed to the Royal Oak Rehabilitation Board of Appeals, 203 S. Troy St., Royal Oak, MI 48067. For additional information contact the planning division at (248) 246-3280. Individuals with disabilities requiring auxiliary aids or services should contact the city manager's office at (248) 246-3203. Call (248) 246-3010 for telecommunications device for the deaf (TDD).

A summary of potential activities and estimated funding amounts is as follows:

PY2022 CDBG Annual Action Plan:  
July 1, 2022 – June 30, 2023

estimated CDBG activities / expenditures	estimated funding level
public service	
in-home supportive services (ROSES)	35,000
homeless prevention & assistance services (SOS)	25,000
housing rehabilitation program - owner rehabilitation	500,000
Webster Rd. retaining wall	100,000
tree planting	100,000
Beverly Ct. closure & Fries Park	300,000
program administration	235,000
unprogrammed funds / contingency	150,918
total estimated program expenditures	1,445,918
estimated CDBG revenues	
entitlement allocation	1,195,918
program income / residential rehab repayments	250,000
transfer from prior years	0
total estimated revenues	1,445,918

Joseph M. Murphy, Director of Planning

**Affidavit - 04-26-2022 Public Hearing**

Annual Action Plan  
2022

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MICHIGAN GROUP

**AFFIDAVIT OF PUBLICATION**  
2125 Butterfield Dr, Suite 102N • Troy MI 48084

City of Royal Oak  
203 S TROY

ROYAL OAK, MI 48067  
Attention: Joseph M. Murphy

**STATE OF MICHIGAN,  
COUNTY OF OAKLAND**

The undersigned Gandy Slater, being duly sworn the he/she is the principal clerk of Royal Oak Tribune, Oakland Press, theoaklandpress.com, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

**City of Royal Oak**

**Published in the following edition(s):**

Oakland Press 06/17/22  
theoaklandpress.com 06/17/22  
Royal Oak Tribune 06/17/22

VICKI ARSENAULT  
NOTARY PUBLIC - STATE OF MICHIGAN  
COUNTY OF OAKLAND  
My Commission Expires May 11, 2026  
Acting in the County of \_\_\_\_\_

Sworn to the subscribed before me this 20 June, 2022

Vicki Arsenault  
Notary Public, State of Michigan  
Acting in Oakland County

**Advertisement Information**

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Sales Person: 200309

CITY OF ROYAL OAK 30-DAY PUBLIC COMMENT PERIOD NOTICE	
Notice is hereby given that a draft copy of the City of Royal Oak's Community Development Block Grant (CDBG) FY2022 Annual Action Plan are available for review and public comment. The documents will be available for a 30-day public comment period through July 13, 2022. A summary of the activities and funding levels is provided below. The documents available for download on the City of Royal Oak's website at <a href="http://romi.gov/250/Application-Documents">romi.gov/250/Application-Documents</a> . The city will take all reasonable steps to provide a copy to disabled persons and non-English speaking persons. Written comments will be accepted by mail to the attention of Joseph M. Murphy, Director of Planning, 203 S Troy St, Royal Oak MI 48067 or electronically at: <a href="mailto:jmurphy@romi.gov">jmurphy@romi.gov</a>	
FY 2022 July 1, 2021 - June 30, 2023	Funding level
CDBG activities / expenditures	
public service	25,000
in-home supportive services (ROSES)	35,000
homeless prevention & assistance services (SOS)	25,000
homeless assistance services (COCH)	20,000
housing rehabilitation program - owner rehabilitation	600,000
Hey/Hudson Park improvements	500,000
program administration	250,000
unprogrammed funds / contingency	102,524
total estimated program expenditures	1,417,524
CDBG revenues	
entitlement allocation	1,187,524
program income / residential rehab repayments	250,000
transfer from prior years	0
total estimated revenues	1,417,524
City of Royal Oak Joseph M. Murphy, Director of Planning	

**Affidavit - 30 day comment period publication**

Annual Action Plan  
2022

## **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.

The Royal Oak Rehabilitation Board of Appeals, in its advisory role for the CDBG program, held public hearings at its October 26, 2021 & April 26, 2022 meetings. No one spoke at either meeting. The board also discussed the activities and funding levels at its May 24, 2022 meeting. Each meeting includes general public comment. No one spoke at the meeting. The Royal Oak City Commission did not hold a public hearing on the PY2022 Annual Action Plan at its June 13, 2022 meeting. All city commission meetings contain an opportunity for public comment. No one spoke at this meeting. No public comment was provided during the 30 day comment period prior to submittal.

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

Not applicable.

## **7. Summary**

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## 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

-

### Consolidated Plan Public Contact Information

Joseph M. Murphy  
Director of Planning  
Community Development Department  
City of Royal Oak  
203 S Troy St  
Royal Oak MI 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 Continuum of Care (CoC), have developed the Five-Year Consolidated Plan and this Annual Action Plan. The consultation included presentations to the Royal Oak City Commission and the Royal Oak Rehabilitation Board of Appeals, public hearings, meetings, and direct mailers to those agencies. A wide array of agencies, groups, and organizations participated in the local process or were provided with the opportunity to participate in the local process. The HOME Consortium members, with Oakland County as the lead agency, meet on an as-needed basis.

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

The response shall be provided by Oakland County in its role as the lead entity for the Oakland County HOME Consortium.

**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 Alliance for Housing of Oakland County is the Continuum of Care (CoC) for Oakland County. It is a 501(c)(3), non-profit organization that is a diverse, collaborative group of partners and individuals all working toward a common goal to end homelessness and increase affordable housing opportunities in Oakland County. The Alliance is made up of a number of organizations from the private and public sectors, and includes entities such as emergency shelters, warming centers, providers of health services including mental health services, providers of services to people with development disabilities, for-profit and not for-profit organizations.

City staff participates in the annual January Point-In-Time (PIT) Count of homeless individuals which is coordinated by the CoC. In January 2022, the City of Royal Oak provide City Hall as a gathering place for volunteers to meet and deploy to known unsheltered "hot spots" in south Oakland County efforts. This was a time for staff to meet, discuss and learn of local efforts with a wide variety of service agencies that assist the homeless.

**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**

Oakland County, the lead agency for the Oakland County HOME Consortium, directly receives ESG (Emergency Shelter Grant) funding. 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. City staff meets as needed with the Executive Director of the local CoC, HMIS Administrator, and housing and supportive service providers to be informed on their efforts and the needs of their clients.

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

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

1	<b>Agency/Group/Organization</b>	South Oakland Shelter
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Pursuant to the Federal requirement in 24 CFR Part 91.100(a)(2), when preparing the portions of this plan describing the city's / consortium's homeless strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the city must consult with: (ii) Public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs. There was no anticipated outcome prior to the invitation to participate. The participation helps identify the service needs of their clients.
2	<b>Agency/Group/Organization</b>	Alliance for Housing Oakland County Continuum of Care
	<b>Agency/Group/Organization Type</b>	Publicly Funded Institution/System of Care
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Pursuant to the Federal requirement in 24 CFR Part 91.100(a)(2), when preparing the portions of this plan describing the city's / consortium's homeless strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the city must consult with: (ii) Public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs. There was no anticipated outcome prior to the invitation to participate. The participation helps identify the service needs of their clients.
3	<b>Agency/Group/Organization</b>	City of Royal Oak
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Pursuant to the Federal requirement in 24 CFR Part 91.100(a)(2), when preparing the portions of this plan describing the city's / consortium's homeless strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the city must consult with: (ii) Public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs. There was no anticipated outcome prior to the invitation to participate. The participation helps identify the service needs of their clients.

4	<b>Agency/Group/Organization</b>	Fair Housing Center of Metro Detroit
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	fair housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Pursuant to the Federal requirement in 24 CFR Part 91.100(a) General, (1) When preparing the consolidated plan, the jurisdiction shall consult with other public and private agencies that provide...and fair housing services...There was no anticipated outcome prior to the invitation to participate. The participation helps identify the service needs of their clients.
5	<b>Agency/Group/Organization</b>	South Oakland Citizens For The Homeless
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Pursuant to the Federal requirement in 24 CFR Part 91.100(a)(2), when preparing the portions of the consolidated plan describing the city's / consortium's homeless strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the city must consult with: (i) The Continuum of Care that serve(s) the jurisdiction's geographic area. There was no anticipated outcome prior to the invitation to participate. The participation helps identify the characteristics of the homeless population in the county and strategies to end homelessness. Knowledge of the characteristics helps focus funding to programs to prevent homelessness and rapidly re-house individuals in a stable setting.
6	<b>Agency/Group/Organization</b>	Oakland County Community & Home Improvement
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	<p>Pursuant to the Federal requirement in 24 CFR Part 91.100(a) General, (1) When preparing the consolidated plan, the jurisdiction shall consult with other public and private agencies that provide assisted housing... &amp; (2) When preparing the portions of the consolidated plan describing the jurisdiction's homeless strategy and the resources available to address the needs of the homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the jurisdiction must consult with: (ii) Public and private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs; There was no anticipated outcome prior to the invitation to participate. The participation helps identify the service needs of their clients.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

None.

**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	Alliance For Housing	This document may match the Alliance For Housing's purpose "to develop a local system that identifies gaps in homeless services and creates solutions to overcome those barriers" & "to end homelessness in our community by linking people in need with the services they require".

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Analysis of Impediments to Fair Housing	City of Royal Oak	The AI 2020 Update identified several impediments and recommended actions to overcome or alleviate the impediments. This document establishes goals and funding opportunities to implement the recommended actions.
Capital Improvement Plan	City of Royal Oak	This document may assist the city in its efforts to implement the CIP which facilitates 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.
Master Plan	City of Royal Oak	This document may assist the city in its efforts to implement the Master Plan which identifies goals, objectives, and strategies related to 8 issues/topics: Neighborhood Preservation & Residential Land Use, Historic Resources, Downtown, Commercial Corridors, Woodward Corridor, Transportation & Circulation, Parks & Recreation Uses, and Community Resources & Facilities.
Parks & Recreation Master Plan	City of Royal Oak	This document may assist the city in its efforts to implement the Parks & Recreation Master Plan which is intended to fulfill its mission statement: "to provide residents a variety of year-round recreation opportunities that are responsive to their needs, are enjoyable to their families and contribute to their physical and mental well-being while maintaining and improving the aesthetic and functional value of all parks, playgrounds, athletic fields, and open spaces.
HOME Consolidated Plan	HOME Consortium	Portions of this document directly relate to the consortia's intent of financially support decent, affordable housing under HOME regulations.
Royal Oak City Commission Strategic Plan	City of Royal Oak	This document may assist the city in its efforts to implement goals and objectives associated with the Royal Oak City Commission's Strategic Plan.

**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 PY2022 Annual Action Plan, the city's goals have already been established in the Strategic Plan portion of the Five-Year Consolidated Plan. Any public comment during the development of the PY2022 Annual Action Plan would not have modified the goals. It did however direct the city commission toward activities and funding levels for PY2022.

The Royal Oak Rehabilitation Board of Appeals held public hearings at their October 26, 2021 & April 26, 2022 meetings. The Royal Oak City Commission will consider the rehabilitation board of appeals' recommendation at their June 13, 2022 meeting. While this is not a public hearing, all Royal Oak City Commission meetings allow the opportunity for public comment. Notice of the 30-day comment period was published in The Daily Tribune on June 17, 2022. No written public comments were received.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	The Royal Oak Rehabilitation Board of Appeals held a public hearing at its October 26, 2021 meeting during the needs development stage of the PY2022 Annual Action Plan.	Not applicable.	Not applicable.	<a href="https://www.romi.gov/272/Public-Notices">https://www.romi.gov/272/Public-Notices</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non-targeted/ broad community	The Royal Oak Rehabilitation Board of Appeals held a public hearing at the second stage of the development of the PY2022 Annual Action Plan at its upcoming April 26, 2022 meeting.	Not applicable.	Not applicable.	<a href="https://www.romi.gov/272/Public-Notices">https://www.romi.gov/272/Public-Notices</a>



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Newspaper Ad	Non-targeted/ broad community	Notice of the October 26, 2021 public hearing was published in the October 10, 2021 edition of The Daily Tribune, a local newspaper, & posted to the city's website.	Not applicable.	Not applicable.	
5	Public Meeting	Non-targeted/ broad community	June 13, 2022 Royal Oak City Commission meeting.	Not applicable.	Not applicable.	<a href="https://www.romi.gov/AgendaCenter/Search/?term=&amp;CIDs=11,2,3,6,&amp;startDate=&amp;endDate=&amp;dateRange=&amp;dateSelector=">https://www.romi.gov/AgendaCenter/Search/?term=&amp;CIDs=11,2,3,6,&amp;startDate=&amp;endDate=&amp;dateRange=&amp;dateSelector=</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Newspaper Ad	Non-targeted/broad community	30 day comment period notice was published in a local newspaper (The Daily Tribune) on June 17, 2022.	None received.	Not applicable.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

-

#### 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	1,167,524	250,000	0	1,417,524	3,600,000	The City of Royal Oak will receive \$1,167,524 of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing & Urban Development (HUD) for PY2022 (July 1, 2022 through June 30, 2023).

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 "matching" non-CDBG or federal funds. The Royal Oak City Commission will weigh the value of proposed activities in light of the goals in the 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 funds 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**

None has been identified at this time.

**Discussion**

-

## 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	Facilitate Access To Public Services	2021	2025	Non-Homeless Special Needs		in-home services: seniors, frail elderly& disabled eviction prevention temporary shelter	CDBG: \$60,000	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
2	Improve Exist. Single-Family Homes & Affordability	2021	2025	Affordable Housing		housing rehab; single-family, owner-occupied	CDBG: \$500,000	Homeowner Housing Rehabilitated: 30 Household Housing Unit
3	Improve Public Facilities & Infrastructure	2021	2025	Non-Housing Community Development		improve parks & recreational facilities	CDBG: \$500,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 385 Persons Assisted
4	Facilitate Access To Immediate Shelter	2021	2025	Homeless		temporary shelter	CDBG: \$20,000	Homeless Person Overnight Shelter: 25 Persons Assisted

Table 6 – Goals Summary

#### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Facilitate Access To Public Services
	<b>Goal Description</b>	
<b>2</b>	<b>Goal Name</b>	Improve Exist. Single-Family Homes & Affordability
	<b>Goal Description</b>	
<b>3</b>	<b>Goal Name</b>	Improve Public Facilities & Infrastructure
	<b>Goal Description</b>	
<b>4</b>	<b>Goal Name</b>	Facilitate Access To Immediate Shelter
	<b>Goal Description</b>	

## **AP-35 Projects - 91.420, 91.220(d)**

### **Introduction**

At its April 26, 2022 and May 24, 2022 meetings, the Royal Oak Rehabilitation Board of Appeals considered a variety of potential activities and provided the city commission with its recommendation. At its June 13, 2022 meeting, the Royal Oak City Commission accepted the board's as presented (items shown below).

#	Project Name
1	in-home supportive services - ROSES
2	homeless prevention & assistance services - SOS
3	homeless assistance services - SOCH
4	housing rehabilitation program - owner rehabilitation assistance
5	Hey/Hudson Park improvements
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	<b>Project Name</b>	in-home supportive services - ROSES
	<b>Target Area</b>	
	<b>Goals Supported</b>	Facilitate Access To Public Services
	<b>Needs Addressed</b>	in-home services: seniors, frail elderly& disabled
	<b>Funding</b>	CDBG: \$35,000
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	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.
	<b>Location Description</b>	At individual residences.
2	<b>Planned Activities</b>	Home chores include household tasks such as cleaning, snow shoveling, lawn mowing, yard work, etc. Home repairs, which do not require a licensed contractors, include minor plumbing, carpentry, and electrical work. Personal care may include assistance with activities of daily living.
	<b>Project Name</b>	homeless prevention & assistance services - SOS
	<b>Target Area</b>	
	<b>Goals Supported</b>	Facilitate Access To Public Services
	<b>Needs Addressed</b>	eviction prevention

<b>Funding</b>	CDBG: \$25,000
<b>Description</b>	CDBG funds would reimburse Lighthouse (d.b.a. South Oakland Shelter) for services provided to Royal Oak residents at-risk of becoming homeless. SOS may provide eligible rental households with no greater than 3 months of rent arrear payments or utility payments to avoid eviction or disconnection of utilities. These services address the priority need to address housing affordability needs of low- to moderate-income renter-occupied households. SOS may also assist those experiencing homelessness with a last known address of Royal Oak. Assistance services include issuance of hotel/motel vouchers for immediate shelter followed by case management, assistance accessing public transportation, clothing, health care, employment, etc. These services address the priority need to support the immediate, temporary shelter needs of those experiencing homelessness. It also addresses the need to support and facilitate access to the wide variety of existing public services that may enhance life skills and self-sufficiency for those experiencing homelessness.
<b>Target Date</b>	6/30/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 low- to moderate-income households
<b>Location Description</b>	At residences.

	<b>Planned Activities</b>	<p>CDBG funds would reimburse SOS for services provided to Royal Oak residents at-risk of becoming homeless. SOS may provide eligible rental households with no greater than 3 months of rent arrear payments or utility payments to avoid eviction or disconnection of utilities. These services address the priority need to address housing affordability needs of low- to moderate-income renter-occupied households.</p> <p>SOS may also assist those experiencing homelessness with a last known address of Royal Oak. Assistance services include issuance of hotel/motel vouchers for immediate shelter followed by case management, assistance accessing public transportation, clothing, health care, employment, etc. These services address the priority need to support the immediate, temporary shelter needs of those experiencing homelessness. It also addresses the need to support and facilitate access to the wide variety of existing public services that may enhance life skills and self-sufficiency for those experiencing homelessness.</p>
<b>3</b>	<b>Project Name</b>	homeless assistance services - SOCH
	<b>Target Area</b>	
	<b>Goals Supported</b>	Facilitate Access To Immediate Shelter
	<b>Needs Addressed</b>	temporary shelter
	<b>Funding</b>	CDBG: \$20,000

	<b>Description</b>	The South Oakland Citizens For The Homeless (SOCH) operates the Welcome Inn Day Center at Starr 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. SOCH is initiating a summer daytime shelter program. 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.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	25 homeless individuals
	<b>Location Description</b>	1717 W 13 Mile Rd (Starr Presb. Church)
	<b>Planned Activities</b>	Administrative costs associated with operating a daytime shelter facility for homeless individuals.
4	<b>Project Name</b>	housing rehabilitation program - owner rehabilitation assistance
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Exist. Single-Family Homes & Affordability
	<b>Needs Addressed</b>	housing rehab; single-family, owner-occupied
	<b>Funding</b>	CDBG: \$500,000
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	approximately 30 low- to moderate-income households
	<b>Location Description</b>	individual site addresses
	<b>Planned Activities</b>	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.
<b>5</b>	<b>Project Name</b>	Hey/Hudson Park improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Public Facilities & Infrastructure
	<b>Needs Addressed</b>	improve parks & recreational facilities
	<b>Funding</b>	CDBG: \$500,000
	<b>Description</b>	CDBG funds will be utilized to remove all existing, deteriorating playground and park equipment. New playground equipment will be purchased and installed. Ground leveling will occur to improvement site drainage. Sod / see restoration and landscaping improvements will create an improved park setting. Fencing will be analyze for possible removal and replacement.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	385 low- to moderate-income households live in census tract 1846, block group 3
	<b>Location Description</b>	Hey/Hudson Park (601 E Hudson Avenue) The park is located on the north side of Hudson Avenue between Knowles St. and Batavia Ave.
	<b>Planned Activities</b>	CDBG funds will be utilized to remove all existing, deteriorating playground and park equipment. New playground equipment will be purchased and installed. Ground leveling will occur to improvement site drainage. Sod / see restoration and landscaping improvements will create an improved park setting. Fencing will be analyze for possible removal and replacement.
<b>6</b>	<b>Project Name</b>	program administration
	<b>Target Area</b>	

<b>Goals Supported</b>	
<b>Needs Addressed</b>	fair housing education & testing
<b>Funding</b>	CDBG: \$235,000
<b>Description</b>	Program administration funds continue to allow the proper oversight of projects and compliance with HUD regulations. These funds also allow the city to enter into contract with the Fair Housing Center of Metro. Detroit for fair housing testing services.
<b>Target Date</b>	6/30/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	not applicable
<b>Location Description</b>	not applicable
<b>Planned Activities</b>	Program administration funds continue to allow the proper oversight of projects and compliance with HUD regulations. These funds also allow the city to enter into contract with the Fair Housing Center of Metro. Detroit for fair housing testing services.

## **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 identified.

### **Geographic Distribution**

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

**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.

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-Otherfor-MFR>

At its November 11, 2020, January 9, 2021, March 9, 2021, April 13, 2021 meetings, the planning commission further discussed lot size, off-street parking & other standards for multiple-family dwellings. At its May 11, 2021 meeting, the planning commission adopted a motion directing staff to prepare a zoning ordinance text amendment for formal review to reduce minimum required off-street parking for multiple-family dwellings and increase maximum permitted building heights in the multiple-family, mixed-use, office, commercial, and industrial zoning districts. They also adopted a motion postponing review of all other discussion topics such as density until the next master plan update.

A public hearing was held at the August 10, 2021 planning commission meeting regarding the proposed text amendments. Materials may be found on the city's website at: [https://www.romi.gov/AgendaCenter/ViewFile/Agenda/\\_08102021-2328](https://www.romi.gov/AgendaCenter/ViewFile/Agenda/_08102021-2328) No action was taken on the text amendments related to minimum required off-street parking for multiple-family dwellings. The planning commission adopted a motion supporting the proposed text amendments to increase the height of buildings. The text amendment was adopted by the city commission at its

December 6, 2021 meeting.

**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**

## **Discussion**

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.

## **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 SOS (Lighthouse of Oakland County) which assists those at-risk of becoming homeless. 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 tract with the highest percentage of minor homeowners. The City will continue to work with the local CoC to utilize the City Hall 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 subreipients 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**

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## Program Specific Requirements

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

#### Introduction

-

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

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

## **Discussion**

PY2022 is the 2nd year of the 5-year cycle

## Attachments



**AFFIDAVIT OF PUBLICATION**  
2125 Butterfield Dr, Suite 102N • Troy MI 48064

City of Royal Oak  
203 S TROY

ROYAL OAK, MI 48067  
Attention: Joseph M. Murphy

STATE OF MICHIGAN,  
COUNTY OF OAKLAND

The undersigned Gladys Gaur Gladys Kater, being duly sworn the he/she is the principal clerk of Royal Oak Tribune, Oakland Press, theoaklandpress.com, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

## City of Royal Oak

**Published in the following edition(s):**

Oakland Press	08/17/22
theoaklandpress.com	08/17/22
Royal Oak Tribune	08/17/22

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## Grantee SF-424's and Certification(s)

OMB Number: 4540-0004  
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
<p>* 1. Type of Submission:</p> <p><input type="checkbox"/> Preapplication</p> <p><input checked="" type="checkbox"/> Application</p> <p><input type="checkbox"/> Changed/Corrected Application</p>		
<p>* 2. Type of Application:</p> <p><input checked="" type="checkbox"/> New</p> <p><input type="checkbox"/> Continuation</p> <p><input type="checkbox"/> Revision</p>		
<p>* If Revision, select appropriate letter(s):</p> <p>_____</p> <p>* Other (Specify):</p> <p>_____</p>		
<p>* 3. Date Received:</p> <p>_____</p>		<p>4. Applicant Identifier:</p> <p>_____</p>
<p>5a. Federal Entity Identifier:</p> <p>_____</p>		<p>5b. Federal Award Identifier:</p> <p>B-22-MC-26-0011</p>
<p>State Use Only:</p>		
<p>6. Date Received by State:</p> <p>_____</p>		<p>7. State Application Identifier:</p> <p>_____</p>
<p>8. APPLICANT INFORMATION:</p>		
<p>* a. Legal Name: City of Royal Oak</p>		
<p>* b. Employer/Taxpayer Identification Number (EIN/TIN):</p> <p>38-6004646</p>		<p>* c. Organizational DUNS:</p> <p>0690198450000</p>
<p>d. Address:</p>		
<p>* Street1: 203 S Troy St</p>		
<p>Street2: _____</p>		
<p>* City: Royal Oak</p>		
<p>County/Parish: _____</p>		
<p>* State: MI: Michigan</p>		
<p>Province: _____</p>		
<p>* Country: USA: UNITED STATES</p>		
<p>* Zip / Postal Code: 48067-2740</p>		
<p>e. Organizational Unit:</p>		
<p>Department Name:</p> <p>Community Development Depart</p>		<p>Division Name:</p> <p>Planning Division</p>
<p>f. Name and contact information of person to be contacted on matters involving this application:</p>		
<p>Prefix: Mr * First Name: Joseph</p>		
<p>Middle Name: M</p>		
<p>* Last Name: Murphy</p>		
<p>Suffix: _____</p>		
<p>Title: Director of Planning</p>		
<p>Organizational Affiliation:</p> <p>City of Royal Oak</p>		
<p>* Telephone Number: (248) 246-3005</p>		<p>Fax Number: (248) 246-3005</p>
<p>* Email: joem@roni.gov</p>		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="C: City or Township Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="US Department of Housing &amp; Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.218"/>	
<b>CFDA Title:</b> <input type="text" value="Entitlement Grant"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="B-22-MC-26-0011"/>	
<b>* Title:</b> <input type="text" value="Community Development Block Grant"/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="community development block grant (CDBG)"/>	
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input style="width: 100px;" type="text" value="12"/>	* b. Program/Project: <input style="width: 100px;" type="text" value="12"/>
Attach an additional list of Program/Project Congressional Districts if needed. <input style="width: 150px;" type="text"/> <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 style="width: 100px;" type="text" value="07/01/2022"/>	* b. End Date: <input style="width: 100px;" type="text" value="06/30/2023"/>
18. Estimated Funding (\$):	
* a. Federal	1,167,524.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	250,000.00
* g. TOTAL	1,417,524.00
* 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 style="width: 50px;" 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 style="width: 150px;" type="text"/> <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 218, Section 1001) <input checked="" type="checkbox"/> ** I AGREE <small>** 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.</small>	
Authorized Representative:	
Prefix: <input style="width: 100px;" type="text" value="Mr."/>	* First Name: <input style="width: 150px;" type="text" value="Michael"/>
Middle Name: <input style="width: 150px;" type="text" value="C"/>	
* Last Name: <input style="width: 200px;" type="text" value="Fournier"/>	
Suffix: <input style="width: 100px;" type="text"/>	
* Title: <input style="width: 150px;" type="text" value="Mayor"/>	
* Telephone Number: <input style="width: 150px;" type="text" value="(248) 246-3285"/>	Fax Number: <input style="width: 150px;" type="text"/>
* Email: <input style="width: 150px;" type="text" value="ccfournier@romi.gov"/>	
* Signature of Authorized Representative:	* Date Signed: <input style="width: 100px;" type="text" value="06/13/2022"/>

## 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.

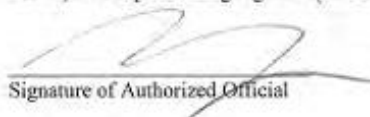
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

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-L.L.L. "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

6/13/2022  
Date

MAYOR  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 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

6/13/2022  
\_\_\_\_\_  
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 (0348-0040), 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:

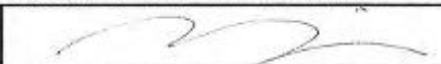
1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give 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 handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
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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9. 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.
10. 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 insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. 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.
13. 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.).
14. 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.
15. 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.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. 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."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. 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 City of Royal Oak, Michigan	DATE SUBMITTED 06/16/2022

Standard Form 424B (Rev. 7-97) Back

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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

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

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

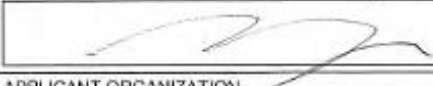
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Royal Oak, Michigan	06/16/2022

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