

HOME-ARP Allocation Plan

Consultation

Describe the consultation process including methods used and dates of consultation:

The City of Muskegon began the process of conducting a survey of the public and interested agencies. Once survey responses were collected, the city met with partner agencies to discuss how we can address existing barriers to access and determine where gaps in services exist. Surveys went out to service agencies within Muskegon County in December 2021.

Meeting 1- 2/15/2022

Initial meeting to explain HOME ARP funding and establish which vulnerable population to assist in a new way. The partners were prompted to bring their top three suggestions for vulnerable populations to the discussion. In this meeting, the partners identified the following groups as vulnerable population. Elderly

Homeless

Youth

Pregnant Moms

Those lacking transportation

Home owners/ home repairs

This meeting was very informative and partners discussed existing programs and community benefits.

Meeting 2- 3/14/2022

In this meeting, the partners identified youth between the ages of 11-17 as the most vulnerable population. It was brought to discussion that unaccompanied minors lack healthy housing options due to the lack of options available to youth. The group brainstormed ways to address the population and determined that multiple forms of centers and housing models were needed to address their needs.

1. Youth Drop in Center
2. Youth transitional housing options
3. Resources that address youth needs surrounding housing

Partners are encouraged to identify how their agency will contribute to resolving youth homelessness in our community.

Meeting 3- 3/31/2022

City of Muskegon Staff met with *Kids Belong*, a local non-profit agency that offers foster care youth housing, to understand more of how the agency assists youth. *Kids Belong* explained that they are able to house youth who are aging out of foster care or are experiencing difficulties with their adoptive families. They are able to facilitate transitional housing by establishing leases, assisting with budgeting, building credit, and offering sliding fee rent. They offer two types of housing options.

1. Shelter setting- 9 beds
2. Apartment style

Kids Belongs hared many barriers such as connecting youth with community and available jobs, hygiene, transportation and funding. Meeting concluded recognizing *Kids Belong* as resource for youth that fit their criteria.

Meeting 4- 4/20/2022

Established HOME ARP dollars will be utilized to create transitional housing that will connect youth to various resources needed to gain success. Meeting concluded with an open invitation to attend a Public hearing at the Commission meeting to share thoughts and offer support from their agency for this homeless initiative for youth.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Salvation Army	Veterans	Meeting	Provided no comment
Every Woman's Place	Public agency that addresses the needs of qualifying population	Meeting	Domestic violence/ Sex trafficking resources

Core Realty Partners	Private agency that addresses the needs of qualifying population	Meeting	Housing resources for homeowners and potential homeowners
Muskegon Housing Commission	Housing commission	Meeting	There is a need for support and resources for case management services to support housing initiatives.
Goodwill	Public agency that addresses the needs of qualifying population	Meeting	Improve housing stock
Norton Shores	Local Government	Meeting	Home rehab programs
Muskegon Rescue Mission	Shelter	Meeting	Shelter is constantly full and expansion of the existing mission is an option to assist the homeless.
DHS	Public agency that addresses the needs of qualifying population	Meeting	Resources for homeless
Muskegon Public School	School District	Meeting	Homeownership programs, Partnership
MAISD	School District (County Wide)	Hearing and Meeting	Homeless supports for youth, Partnership
Community Encompass	Public agency that addresses the needs	Meeting	Homeless supports for youth, Partnership

	of qualifying population		
Fair Housing	Public agencies that addresses the needs of qualifying populations	Email	housing programs and services that place particular emphasis on outreach to, addressing systemic discrimination against and ensuring access to permanent, affordable housing for people experiencing or on the verge of housing instability or homelessness, people with disabilities, low income households with housing assistance and/or Social Security income, and racial and ethnic minorities.
Pine Grove Housing	Private agency that addresses the needs of qualifying populations	Email	Informed the Gap Analysis - Need for newer stock of affordable housing, quick reliable resource for move-in costs like deposits and fees, case management for chronically homeless for a year or two
Pioneer Resources Inc.	Services for disabled and senior citizens	Meeting	Affordable Housing
Health West	Mental health Services	Meeting	Homelessness for youth partnership

Continuum of Care	Public agency that address the needs of qualifying population	Meeting	Homelessness, Partnership
United Way	Public agency that address the needs of qualifying population	Meeting	Homelessness, Partnership
Hope Project	Non-Profit	Meeting	Trafficking resources
Kids Belong	Non-Profit for foster children	Meeting	Youth Homelessness
Community Foundation for Muskegon County	Public agency that address the needs of qualifying population	Meeting	Homelessness, home repairs, transportation
City of Muskegon Heights	Local Government	Meeting	Homelessness
Disability Network	Non-Profit	Meeting	Disabilities and Homelessness
Mercy Health	Health	Meeting	Homelessness, transportation, homeownership, home repairs and disability or health services
Access Health	Health	Meeting	No comment
YMCA	Public agency that address the needs	Meeting	No comment

	of qualifying population		
Public Health	Public agency that address the needs of qualifying population	Meeting	Supports for low income families/ affordable housing
Angel Community Church	Church	Meeting	Affordable Housing
Fresh Coast Alliance	Public agency that address the needs of qualifying population	Meeting	No Comment
Council on Aging	Public agency that address the needs of qualifying population	Meeting	No comment
Grand Rapids AYA	Public agency that address the needs of qualifying population	Meeting	Found it surprising that our community has no resources to assist youth in homelessness and find that often kids are transported into the Grand Rapids area for support and resources.
Boys and Girls Club of the Lakeshore	Public agency that address the needs of qualifying population	Meeting	Tenant based rental assistance programs are needed in the community.

Summarize feedback received and results of upfront consultation with these entities:

Across Muskegon County, community leaders have been working to find stable housing options for unaccompanied minors between the ages of 11-17. Approximately 800 homeless youth have been identified as unaccompanied minors. It is believed the number is significantly higher based on youth who choose not to disclose their present location of residence. In the absence of a stable, permanent home setting, these unaccompanied minors are faced with, for example, living out of vehicles, hotels, affected by abusive relationships or relying on the sporadic and inconsistent grace of acquaintances who make a couch available. We intend to use these funds to develop collaborative community partnership and alternative solutions to address this unmet need.

Muskegon County is the only county that does not have any resources for unaccompanied minors who are termed doubled-up, which is described as the sharing of housing of other persons due to the loss of housing, or economic hardship. Typically, children who are displaced from families are able to be placed in foster homes that may lead to permanent housing. Currently, there are facilities located through the county Department of Health and Human Services office and Arbor Circle who are providing available resources to youth who face homelessness or separation from parents. The frequency by which these unaccompanied minors change the location of their residence unfortunately does not create the legal standard, as recognized under the federal McKinney-Vento Act and our county's Continuum of Care, to receive critical housing services.

Public Participation

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice: 1/30/2022***
- ***Public comment period: start date - 1/30/2022 end date – 2/10/2022***
- ***Date(s) of public hearing: 2/3/2022, 5/26/2022***

Describe the public participation process:

Citizens may submit comments by mail, phone, on the City's website: <https://muskegon-mi.gov/city-services/development-services/community-neighborhood-services/>, or by e-mail

to:

Community and Neighborhood Services Director

City Hall / 933 Terrace St

Muskegon, MI 49440

(231) 724-6717

cnsmail@shorelinecity.com

Describe efforts to broaden public participation:

Surveys were also made available to the public via Facebook, city website, and in-person at Muskegon City Hall.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

The public expressed need for the following:

Update housing stock

Rehab homes

Homeownership programs and education

Build homes by the block

Awareness to resources

Rent to own program

Safe housing/environment

Partner with Muskegon Heights

Connect with Realtors

Mentorship programs for housing and entrepreneur

Seminars

Youth Housing Center

Access points for youth to programs

Assistance for therapy

Avoid double dipping

90 percent of homeless would like to remain homeless

Shelters are not great places for homeless to go

Young men that are over 18 with disabilities are discouraged from the mission

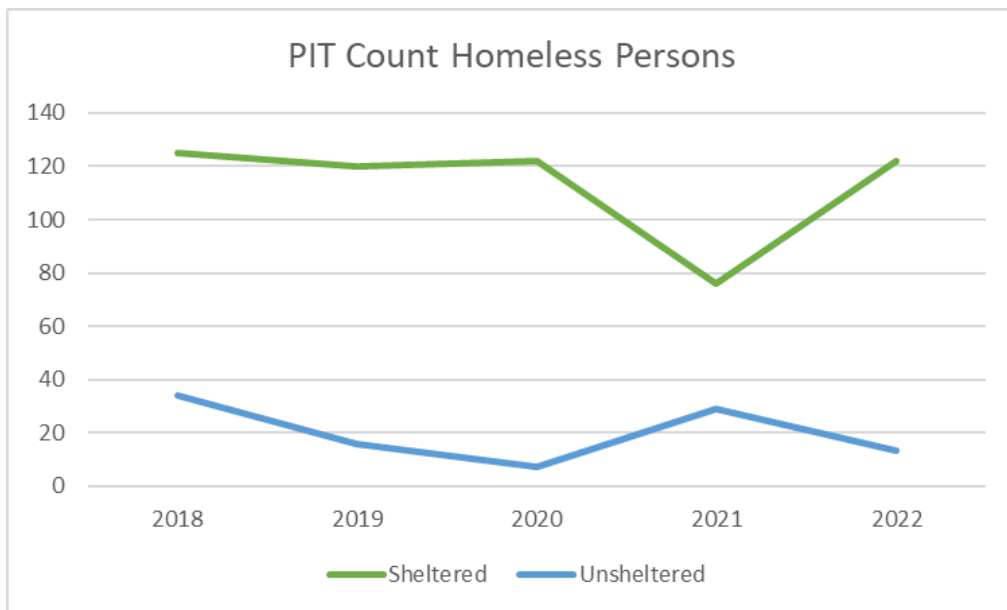
Young men with disabilities who belong to homeless mothers are not allowed to stay in the same shelter

Summarize any comments or recommendations not accepted and state the reasons why:

There were no comments denied during this process

Needs Assessment and Gaps Analysis

The Continuum of Care (MI-516) that serves the City of Muskegon also collects data for Muskegon County. The Point-in-Time count that occurred on February 23, 2022 indicated that 62 households without children were residing in local shelters, while 9 were identified as unsheltered. 22 households with at least one adult and one child were residing in shelters on the same date. In sum, for this winter PIT count, there were a total of 84 households that were in emergency shelters and nine unsheltered homeless within Muskegon County.



As shown in the chart above, the unsheltered population has stayed relatively consistent from 2018-2022, with the only real decrease occurring in 2020 and a five-year average of around 20 unsheltered people. The five-year average for sheltered homeless is 113.

As of 2021-2022, data received from the Muskegon Area Intermediate School District (MAISD) McKinney-Vento Data demonstrated that there was a total of 590 youth within the school system, from infant to 12th grade, experiencing homelessness, 90 of which were unaccompanied minors, with the bulk of those youth (454) living with family or friends. Of all these youth, the priority lies with the 136 youth that are currently unsheltered, residing in transitional housing, in shelters, or residing in hotels/motels.

Healthwest, Muskegon County's Community Mental Health organization provided data regarding their clientele. Between February and June 2022, 6.64% of their 4,594 clients identified as homeless, totaling 305 people. Of these individuals, 48.96% identified as male, 26.39% as female, and the remaining chose not to disclose, identified as female to male, or two-spirit. Racial demographics are representative of the general population of the City of Muskegon, with the major racial groups accounting for 55% of the individuals identifying as White, 32% as Black. These individuals were also surveyed about their needs as they relate to the Social Determinants of Health, which represent the nonmedical factors that influence health outcomes which include: economic stability, education access and quality, health care access and quality, neighborhood and built environment, and social/community context. Of these areas, the individuals surveyed who were experiencing homelessness ranked the following needs as the most pressing:

Housing Needs - 79.03%

Healthcare (Poor Health) - 72.58%

Clothing & Household Supplies - 66.13%

Employment - 62.90%

Personal Safety - 53.23%

This demonstrates a priority for those experiencing both mental health concerns and homelessness for housing, which is largely considered fundamental to the other Social Determinants of Health. This is mirrored in the sub population data for the Continuum of Care, with people with mental health issues representing the first or second largest subgroup of those experiencing homelessness.

The prevalence of sex crimes is a relevant statistic when assessing the composition of people fleeing or attempting to flee domestic violence, sexual assault, human trafficking and/or stalking. According to the Bureau of Justice Statistics, in 2021, 165 incidents involving sex crimes occurred within the Muskegon Metropolitan Statistical Area. Of the victims of these incidents,

63.6% were 17 years old and younger, the largest portion being aged 5-14 years old, at 42%. Of these acts, 51.1% were conducted by a friend or acquaintance, and 7.1% by an intimate partner.

In 2018-2022, with the exclusion of 2021 due to the modifications of in person surveys from HUD, individuals that are considered victims of domestic violence were represented the highest number out of all of the people classified in the following populations: severely mentally ill, chronic substance abuse, veterans, HIV/AIDS, unaccompanied youth, parenting youth, and children of parenting youth. According to the Muskegon County Continuum of Care PIT counts, people fleeing or attempting to flee domestic violence were the first or second largest sub-population of people experiencing homelessness for the past 5 years; second at times only to people with mental health issues.

Furthermore, according to the Polaris Project, in 2021 the most prevalent risk factors/vulnerabilities for those experiencing labor trafficking were recent migration/relocation, being an unaccompanied refugee minor, and having unstable housing, respectively. Victims of sex trafficking showed that the most common risk factors/vulnerabilities in the same year were substance use concerns, runaway/homeless youth, unstable housing, and recent migration/relocation, respectively. This information culminates in an expression of the need for housing and shelter for this population in particular.

The Continuum of Care identified that veterans make up one of the smallest subgroups of homeless individuals. The past five years of PIT counts from the Muskegon County Continuum of Care counted a maximum of six homeless veterans in the county. Most recently, the February 2022 count noted only one homeless veteran.

A Housing Needs Assessment conducted in 2023 by Bowen National Research for the City of Muskegon indicated that the City of Muskegon has a higher poverty rate among its overall population compared with Muskegon County and Michigan, with over 7,900 people living in poverty in the city and over one in three children living in poverty. Nearly one-fourth (24.8%) of the population in the City of Muskegon suffers from poverty, which reflects a poverty rate more than double the rate (11.5%) of Muskegon County and a much higher poverty rate than the state (13.7%) overall. The population of those less than 18 years of age has the highest poverty rate (34.1%) in the City of Muskegon, which reflects a much higher rate for this cohort than the corresponding rates for Muskegon County (16.9%) and state (18.8%). Adults, ages 18 to 64 years, have the second highest poverty rate (22.7%) among age groups in the City of Muskegon, which is also higher than the rates within Muskegon County (11.0%) and state (13.4%). Those age 65 and older have the lowest poverty rate among the three age cohorts in the City of Muskegon (16.1%); however, this still represents a significantly higher rate than that for Muskegon County (6.6%) and state (8.5%). Overall, the data suggests that the population of the City of Muskegon is disproportionately affected by poverty, regardless of age, and that housing affordability is likely a critical issue for many Muskegon residents.

Among individual neighborhoods, the overall poverty rate is highest within the McLaughlin/Angell/Marsh Field (38.7%) and Nelson (35.8%) areas. Both submarkets have overall poverty rates that far exceed the City of Muskegon rate (24.8%), which already represents a rate that is notably higher than the surrounding County and the state overall.

As such, McLaughlin, Angell, Marsh Field and Nelson neighborhoods are the most disproportionately affected areas in the City of Muskegon in terms of poverty and are consequently those most likely in need of affordable housing options. It should be pointed out that based on the survey of area multifamily rentals, all surveyed Tax Credit and government-subsidized rentals in the City of Muskegon are occupied and most have wait lists. This poses a significant obstacle for persons living in poverty that are seeking affordable rental alternatives.

More than 400 occupied housing units in the City of Muskegon are considered “substandard, “while 4,607 occupied housing units are housing “cost burdened.” For the purposes of the analysis, substandard housing is considered overcrowded (1.01+ persons per room) or lacks complete indoor kitchens or bathroom plumbing. Based on American Community Survey 2020 estimates, approximately 314 rental units and 110 owner units in the City of Muskegon are considered “substandard.” The largest number of substandard housing units are within the Campbell Field/Nims submarket, representing over one-third of all substandard housing in the City of Muskegon. As a result, it is clear that many households are living in housing conditions that are considered to be below modern-day housing standards and/or unaffordable to many households.

“Cost burdened” households pay over 30% of income toward housing costs. The City of Muskegon has higher shares of housing cost burdened households among its renter households (48.1%) and owner households (20.2%) than the surrounding County and state. Overall, the City of Muskegon has an estimated 3,233 renter households and 1,374 owner households that are housing cost burdened, with a combined total of 4,607 cost burdened households in the city of Muskegon. The Nelson Submarket has the greatest shares of renter-occupied (67.0%) and owner-occupied (26.8%) cost burdened households.

Additionally, there is limited available inventory among multifamily rentals and pent-up demand for housing serving lower-income renter households. A total of 51 multifamily apartment properties containing 5,813 units within Muskegon County were surveyed. Of these projects, 22 were in the City of Muskegon with an overall total of 2,710 units. The remaining 29 surveyed projects in the surrounding County were used to provide a base of comparison. The surveyed rentals within the City of Muskegon have a combined occupancy rate of 98.9%. Typically, healthy, well-balanced markets have rental housing occupancy rates generally between 94% and 96%. As such, the City of Muskegon’s multifamily rental market is operating at an exceedingly high occupancy level with very limited availability. Compounding the market’s rental challenges is the fact that the surrounding County is operating at an even higher

occupancy rate of 99.2%. The City of Muskegon's occupancy rates among the different product types are: Market-Rate: 98.2%, Low-Income Housing Tax Credit (generally serving households earning between 50% and 80% of Area Median Household Income): 100.0%, and Government-Subsidized (serving households earning up to 50% of Area Median Household Income): 100.0%. Therefore, Muskegon has a relatively limited supply of available multifamily rentals, regardless of the level of affordability. The 100.0% occupancy rates and long wait lists at Tax Credit and subsidized properties indicate there is pent-up demand for housing that is affordable to lower income households. The lack of available housing serving low-income households is likely contributing to the large number of renters living in substandard and/or cost burdened housing situations in the city.

According to Pine Grove Housing Services who manages the housing choice vouchers for Muskegon County, there are currently four open vouchers that will be filled in the coming weeks, and there is consistent turnover of vouchers in the county. This agency also identified three needs within Muskegon County: a newer stock of affordable housing, a quick reliable resource with move-in costs, and long-term case management for the chronically homeless, as many of the homeless individuals that get houses end up getting evicted or walking away from their unit within a year of being housed. Conversely, the Housing Needs Assessment identified through a survey of 23 stakeholders, defined as "community leaders from a broad field of expertise," identified that the priority for homeless individuals and families was expanded access to emergency shelter. This is supported by the fact that Muskegon County has no emergency shelter for those experiencing homelessness that doesn't require religious activities for participation, aside from the services reserved for those experiencing domestic violence by Every Woman's Place.

To help people experiencing homelessness access necessary resources, SOAR is a program that assists individuals with applying for the social security benefits they may be entitled to. This can serve as an important resource toward helping those experiencing homelessness, disability, and mental illness with financial resources necessary to improve their situation. Within Muskegon County, there are two agencies with Certified SOAR Practitioners on staff: HealthWest and Community EnCompass. Last year, of the 5 staff trained at HealthWest, only one staff person completed 2 SOAR assistant claims, and Community EnCompass did not complete any. The Regional SOAR Navigator for the Michigan Department of Health and Human Services identified that one of the primary challenges associated with SOAR expansion and service provision is the fact that funding is scarce. Often, staff receive the training but do not have the capacity to put their skills into practice as they must prioritize other job duties. It has been shown that in communities where staff are funded to provide SOAR assistance they are able to successfully assist individuals with accessing SSI/SSDI benefits.

The major gaps in service and supply for the four qualifying populations are:

1. **Quality Affordable Housing** - Affordable rental housing is a pressing need within the City of Muskegon. Due to the capacity limits of affordable housing and waitlists for properties, developing additional rental housing that remains affordable despite market fluctuations will help to serve qualifying populations. Currently, the lack of affordable housing and aging housing stock are pressing issues within the City of Muskegon that must be addressed.
2. **Move-in Expense Assistance** - The costs associated with a new move into a property can be a barrier toward renting, no matter how affordable the property may be. With 48.1% of households being considered cost burdened, many may be unable to save for moving expenses, and costs associated with acquiring housing for the first time.
3. **Case Management** - Long-term case management was identified as a need for the chronically homeless, as sustaining tenancy has proven to be a challenge for some. Supporting case management allows for the coordination of services to support independent living and progress toward housing and health goals.
4. **Emergency Shelter** - There are no emergency shelters in Muskegon County that serve qualifying populations without requiring religious activities to qualify. There are two shelters that require engagement with religious activities, and one that is strictly for survivors of domestic violence. Our community needs a low/no barrier emergency shelter that allows those experiencing homelessness a safe place to reside without religious requirements that may deter some from seeking services.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The method that will be utilized for soliciting developers, service providers, contractors and subrecipients will be through a public Request for Proposals (RFP). The call for proposals will be made available on social media, published in the local newspaper, and on the City of Muskegon's website.

Assessing each organization and proposal is a necessary first step when vetting potential activities. The quality of the project and the capacity of the organization must be sufficient to reasonably ensure any funding provided will be well-spent.

All proposals that are not disqualified will be subjected to a pre-award assessment conducted by CNS Staff. The results of this assessment will accompany the proposal for the remaining steps of the assessment period, through commission approval, and will be added to the applicant's record. The following categories are assessed:

Risk – Points will be awarded based on the level of risk associated with the organization completing its proposed activity. This score determines the frequency of monitoring, and is

based on staffing experience and ability, financial resources, history of compliance, and familiarity with HOME programming.

Financial Capacity – By reviewing the financial documents submitted with the application, CNS Staff in partnership with the finance department, will determine the viability and reasonableness of the proposed activity in terms of the budget and general financial capacity of the organization.

Grant Experience- CNS Staff will assess the past performance of the organization in relation to grants received by the City of Muskegon. This score expresses the organization’s past performance or lack thereof.

Staff will complete the assessment and document their rationale in the narrative section of the assessment for each category. The accepted proposals are then forwarded to the Citizen’s District Council to be reviewed and approved for final recommendations, before coming before the City Commission for official approval.

The City has also partnered with the Continuum of Care to create a position with Muskegon County United Way to navigate coordinated entry for homelessness. This person will be the first responder to all that face homelessness and direct or connect clients to agencies that can help meet the need.

Describe whether the PJ will administer eligible activities directly:

The City of Muskegon will utilize coordinated collaboration of United way, Muskegon Continuum of Care, housing agencies and Developers who will assist with development of multi-Unit housing.

If any portion of the PJ’s HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:

- N/A.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 200,000		

Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 800,000.00		
Non-Profit Operating	\$ 36,412.50	2.9 %	5%
Non-Profit Capacity Building	\$ 36,412.50	2.9 %	5%
Administration and Planning	\$ 145,425.00	11.9 %	15%
Total HOME ARP Allocation	\$ 1,218,250.00		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The City of Muskegon will address the need for additional rental options in our community by committing \$800,000 to develop safe, decent, and affordable rentals to be made available for all qualifying populations. This investment will add multi-family affordable housing. A minimum of two units for every multi-family development will meet ADA requirements.

The data also reflects a need for supportive services for those experiencing mental illness, disabilities and other limitations that place barriers on finding safe and appropriate housing. \$200,000 will go toward supporting agencies who serve qualifying populations with supportive services to maintain or gain safe and affordable housing. These services may include but are not limited to the following; assistance with moving costs, case management, childcare, education services, employment and job training, food, housing and counseling services, legal services, life skill training and mental health services, outpatient health services, outreach services and substance abuse treatment (24 CFR 578.53).

The budget outlines about \$72,825.00 to strengthen the operations or establish new CHDO organizations within the community. The Continuum of Care will be utilized as a connector for those experiencing homelessness to ensure that citizens are connected to proper resources. The Muskegon County Continuum of Care's coordinated Entry Policy and Procedures are attached

for review. The remaining \$145,425.00 will be applied to admin, training and planning to execute the plan.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Based on the data presented in our gap analysis, it has been determined that there are four areas of concern in the shelter and housing inventory. The four areas are quality of affordable housing, move-in expenses assistance, case management and emergency shelter. The characteristics include cost burdened housing where households are contributing over thirty percent to rent, lack of appropriate housing and limited inventory across the county with the highest need in the heart of the City of Muskegon.

Due to the evidence collected within the needs and gap analysis and combined information of the neighboring agencies, it is apparent that there is a huge need for housing that is considered appropriate in relation to cost, health and safety and meets the family needs. More specifically there is a shortage of housing that is suitable for those living with disabilities, single family versus multi-family housing and owner occupied units. Overall, the current market cannot justify the demand for those experiencing homelessness with current housing stock due to lack of vacant units. The data reflected in the housing study indicates there are no vacant units to fit the current size and need of the population.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The City of Muskegon will create at minimum 12 units of affordable housing that will be made available to all qualifying populations. The city has led the market by scattering newly developed housing throughout the community to increase the amount of access individuals who wish to become homeowners have to decent housing. The goal is to follow the leadership by creating units for all. In doing so, the City will coordinate with local CHDO and developers to develop 2-3 multi-family homes. Each development will have a minimum of 4 units, that will include at least two ADA accessible units to meet the needs of those living with disabilities. We will work with our Planning, Economic Development department as well as realtors and developers to determine placement of units throughout the City of Muskegon. Our current data reflects the neighborhoods with the greatest need as Mclaughlin, Angell and Marsh field

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The city will make available affordable units to be utilized as temporary housing that can be leased for up to 2 years while tenants locate permanent housing. The Muskegon County Continuum of Care has created a coordinated entry position that will serve as the connector of the homeless with resources within the community. Those who contact the COC will be prioritized by a first come first serve basis to house families in these temporary units.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

There will be no preference established for any qualifying population. All four QPs will be eligible for and able to benefit from all HOME ARP funded activities.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

N/A

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

There will be no limitations to a certain qualifying population.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

N/A

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

N/A