# Table of Contents

Exhibit A Executive Summary	2
Exhibit B Threshold Requirements and Other Submission Requirements	3
Exhibit C Need	4
Exhibit D Soundness of Approach	8
Exhibit E Capacity	18
Exhibit F Leverage	20
Exhibit G Long-Term Effect	21
Budget	22

#### **Exhibit A Executive Summary**

In 2023, the City of Muskegon commissioned a Housing Needs Assessment and Analysis of Impediments Study that identified a lack of affordable housing and aging housing stock as two of the greatest needs in Muskegon that also serve as barriers to fair housing. This proposal seeks to address those needs and create sustainable affordable housing options.

The City of Muskegon is requesting the maximum award of \$10 million to address barriers to affordable housing in our city. We intend to use the funds to support new construction, rehabilitation, down payment assistance, and home repairs that will ensure affordable housing is available to meet the needs of our community now and into the future. The City Commission approved \$2.5 million in leveraged Public Improvement funds to be committed to the activities contained in this proposal.

#### **Exhibit B Threshold Requirements and Other Submission Requirements**

The City of Muskegon meets all threshold eligibility requirements of FR-6700-N-98. There are no charges, cause determinations, lawsuits, or letters of findings that are not resolved to HUD's satisfaction for the following:

- 1. Charges from HUD concerning a systemic violation of the Fair Housing Act or receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of a substantially equivalent state or local fair housing law proscribing discrimination because of race, color, religion, sex (including sexual orientation and gender identity), national origin, disability or familial status.
- The City of Muskegon does not hold a status as a defendant in a Fair Housing Act lawsuit filed by the United States alleging a pattern or practice of discrimination or denial of rights to a group of persons raising an issue of general public importance under 42 U.S.C. 3614(a).
- 3. The City of Muskegon does not have a status as a defendant in any other lawsuit filed or joined by the Department of Justice, or in which the Department of Justice has intervened, or filed an amicus brief or statement of interest, alleging a pattern or practice or systemic violation of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974, the Americans with Disabilities Act, Violence Against Women Act, or a claim under the False Claims Act related to fair housing, non-discrimination, or civil rights generally including an alleged failure to affirmatively further fair housing.
- 4. The City of Muskegon has not received a letter of findings identifying systemic noncompliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974; Violence Against Women Act; or the Americans with Disabilities Act.
- 5. The City of Muskegon is not in receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of provisions of a state or local law prohibiting discrimination in housing based on sexual orientation, gender identity, or lawful source of income

#### **Exhibit C Need**

The City of Muskegon has made great strides toward identifying the barriers to affordable housing production and preservation within our community. Namely, the city commissioned a Housing Needs Assessment that details the current state of, and gaps within the housing stock of Muskegon. By investing in the Housing Needs Assessment, we have demonstrated a commitment to identifying these barriers so we can strategically address them. This document serves as the foundation to the Housing Strategy currently being developed by the City of Muskegon, and the root of the measures this proposal seeks to implement.

The greatest barriers that need to be addressed to produce and preserve more affordable housing for the City of Muskegon are:

- Development Costs These serve as a barrier to affordable housing due to the costs of financing, labor and materials, acquisition and land costs, and utility installation costs. Due to the rise of these expenses related to development, luxury and market rate housing is more likely to be developed than affordable units.
- 2. **Zoning** The City of Muskegon needs to rezone areas to form based code to allow for more housing options within our neighborhoods.
- Limited Funding for Repair/Rehabilitation The age of our housing stock and rise of substandard units calls for repair funds that are beyond the City's current programming. In addition, SafeBuilt, the agency that registers and inspects rental properties with the City, has reported that roughly 1/3 of the 6,000 units have active code violations.
- 4. Lack of Affordable Housing Simply put, the City of Muskegon needs more affordable housing units for purchase and rent. Wages have not kept up with the increase in rents and it has left low-income families without many options for housing.

To begin addressing barriers, the City of Muskegon has been rezoning properties to allow for more housing choices since 2015, when the City Commission adopted its form-based code (FBC). The "urban residential" context area of the code allows properties to have either single-family houses, duplexes, triplexes or quadplexes, in addition to accessory dwelling units. These new housing choices have provided residents with more housing options, helping to ease the strain on the housing market and rising construction costs. Since 2015, the City has successfully rezoned the entire Nelson neighborhood to FBC along with sections of the Nims, Lakeside, Campbell Field and Angell neighborhoods. Our goal is to rezone all single-family properties in the Jackson Hill, McLaughlin and Angel neighborhoods to FBC, urban residential. This will allow for the remedy of historically racist and classist single-family zoning that has limited housing choice in our community and many others across the United States.

The City of Muskegon has a long history of investing in our underserved communities. As an area that has felt the negative effects of historical urban renewal, systemic racism, and unfair housing/lending practices, what we have been left to grapple with is a diverse community that has been underserved for decades. We currently seek to meet the needs of our community through housing rehabilitation, housing development, rental housing, and advocacy. In the past

five years, the City of Muskegon has served low-income households by providing 410 home repairs and assisted 77 low-income homebuyers to purchase homes. In addition, we have rehabilitated blighted homes for resale to low-income neighbors. Through partnership with the Fair Housing Center of West Michigan, we are implementing programs within our city to remedy unfair housing practices in census tracts neglected by Fannie Mae.

According to the Muskegon Housing Needs Assessment 2023, the City of Muskegon has a notably higher poverty rate compared to both the remaining County and the State of Michigan as a whole. In the City of Muskegon, more than 7,900 individuals live in poverty, and a striking one in three children are affected by poverty. The data underscores a significant poverty issue in the City, affecting individuals of all age groups. Housing affordability is a pressing concern for many residents, and certain neighborhoods within the City of Muskegon are disproportionately affected, namely, the McLaughlin, Angell, Marsh Field and Nelson neighborhoods. Affordable housing options are in high demand, with limited availability, posing a challenge for those in need.

In 2022, renters earning less than \$30,000 annually made up a significant 57.0% of all the City of Muskegon renter households. This is notably higher than the rest of Muskegon County at 42.2% and the state at 39.1%. Among homeowner households in the City of Muskegon in 2022, 38.5% earn \$60,000 or more annually, 33.7% earn between \$30,000 and \$60,000, and the remaining 27.8% earn less than \$30,000. The share of lower-income homeowners (27.8%) in the City of Muskegon is much higher than the rest of the county (15.5%) and the state (13.5%). Projections from 2022 to 2027 suggest that all growth in renter households in the City of Muskegon will be among those earning \$30,000 or more. The largest growth is expected among renters earning between \$50,000 and \$59,999 (55.4%) and those earning \$100,000 or more (54.5%). Similarly, between 2022 and 2027, all growth among owner households in the City of Muskegon is projected to occur among households earning \$60,000 or more. This growth pressure from higher income residents can invite displacement, when not kept in check. However, the market is poised to fulfill the needs of those with higher incomes with various developments in progress. The efforts put forth in this proposal seek to fulfill the needs of low/mod income renters and homeowners to avoid such displacement.

The increasing housing costs in Muskegon, encompassing rising rents and increased costs associated with lending, can place significant financial strain on residents, especially those with fixed or low incomes. These mounting costs often surpass income growth, leading to housing instability and cost-burdened households, with families spending more than 30% of their income on housing. Notably, the City of Muskegon exhibits higher proportions of cost-burdened households within both its renter households (48.1%) and owner households (20.2%) compared to the surrounding county and the state. Overall, Muskegon has an estimated 3,233 renter households and 1,374 owner households that fall into the category of being cost burdened by housing, culminating in a total of 4,607 cost-burdened households. Within Muskegon, the Nelson Submarket stands out with the highest percentages of cost-burdened households, comprising 67.0% of renter-occupied households and 26.8% of owner-occupied households.

A shortage of affordable housing options and the growth pressures mentioned previously can create displacement pressures. Low-income residents may struggle to find suitable, affordable homes, leading to overcrowding, homelessness, or forced relocations. Public policy and rezoning decisions can significantly influence displacement pressures in the City of Muskegon. It's important to strike a balance between economic development and housing affordability in policymaking and zoning decisions. A comprehensive approach that considers the unique needs and challenges of Muskegon's communities can help alleviate displacement pressures and promote equitable urban development. The City of Muskegon's initiative to undergo rezoning is a positive step towards addressing housing and diversity challenges in the community. Rezoning can play a pivotal role in shaping the future of the city by addressing the availability of diverse housing options. The City of Muskegon seeks these additional funds to support creating long-term affordable housing in areas of need and opportunity to prevent this displacement.

Disinvestment can have a direct relationship with displacement pressures in the City of Muskegon. Disinvestment refers to the withdrawal of investment in a particular area or community, often resulting in declining infrastructure, reduced economic opportunities, and deteriorating living conditions. In the City of Muskegon, there are commercial corridors that play a pivotal role in driving local economic activity. These corridors serve as vital hubs for various businesses and activities, effectively stimulating the local economy. The City of Muskegon's Master Land Use Plan describes that while certain areas have benefited from increased public investment and improved walkability, there are also corridors that have experienced significant turnover, high vacancy rates, and disinvestment. Some of these areas include Jackson Hill/Marquette, McLaughlin/Angel/Marsh, and the Nelson neighborhoods. This indicates disparities in development and economic activity within the city.

Addressing these racial and socioeconomic disparities in displacement requires a multi-faceted approach that includes equitable housing policies, targeted economic development, affordable housing initiatives, tenant protections, and efforts to promote inclusivity and social cohesion within the city. Ensuring that the benefits of development and revitalization are accessible to all residents is crucial to mitigating these disparities. This proposal seeks to combine equitable housing development, tenant protections, and affordable housing development to promote desegregation and inclusivity.

Household growth in Muskegon has shown a positive trend since 2010 and is anticipated to continue in the same direction until 2027. Between 2010 and 2020, the number of households in the PSA increased by 653, marking a growth rate of 4.7%. This growth rate slightly exceeded that of the remainder of the county at 4.5% and the state, which saw a 4.4% increase during the same period. As of 2022, Muskegon is home to a total of 14,628 households, indicating a marginal 0.1% increase compared to 2020. Looking ahead, between 2022 and 2027, it's projected that the number of households will grow by 109, representing a 0.7% increase. Notably, this projected growth rate surpasses that of the remainder of the county at 0.2% and the state at 0.3%. The city's expected household growth is poised to contribute to increased demand for housing in the foreseeable future.

In the City of Muskegon, more than 400 occupied housing units are classified as substandard. According to the 2020 American Community Survey estimates, approximately 314 rental units and 110 owner units in the City of Muskegon fall into the substandard category. The largest concentration of substandard housing units is found within the Campbell Field/Nims neighborhoods, accounting for over one-third of all substandard housing in the city. These findings highlight that a significant number of households in the City of Muskegon are living in housing conditions that do not meet modern-day housing standards. A substantial portion of housing units, roughly 62.9% of those occupied by renters and 83.4% of owner-occupied units, were constructed prior to 1970, demonstrating the significant age of housing stock is when compared to the broader county, where only 47.4% of renter-occupied units and 44.4% of owner-occupied units were built before 1970.

The Housing Needs Assessment's community survey revealed a consensus among all surveyed groups that housing affordability and availability are the foremost housing challenges in the area. Respondents overwhelmingly expressed the need for housing options with rents under \$1,000 and homes priced below \$150,000. Common housing-related concerns include affordability issues for both renters and homebuyers, as well as obstacles related to down payments and security deposits. Notably, local employers also grapple with housing challenges, with more than half of them indicating a willingness to hire more employees if adequate housing options existed. This survey unveiled a significant finding that employers could potentially hire between 199 and 309 additional employees if the county had sufficient housing. Stakeholders identified priorities centered on providing homebuyer assistance and supporting home repair education and funding. Additionally, they pinpointed the cost of labor, materials, and development expenses as key barriers to residential development. These findings underscore the pressing need to address housing affordability and availability while recognizing the interconnectedness of housing challenges with employment and economic factors, offering potential solutions benefiting both residents and local businesses.

The Continuum of Care (MI-516), conducted a Point-in-Time count on February 23, 2022, that provided valuable insights into the issue of homelessness within Muskegon County. The count identified 62 households without children who were residing in local shelters, along with an additional 9 households identified as unsheltered. On the same date, 22 households with at least one adult and one child were found to be residing in shelters. In total, this winter's Point-in-Time count recorded 84 households in emergency shelters and an additional nine households as unsheltered homeless individuals within the county. These numbers underscore the ongoing challenges and pressing needs in addressing homelessness within the community.

In sum, our recent Housing Needs Assessment has confirmed what we've observed: there is a severe shortage of affordable housing for both renters and homeowners in the area. With this understanding, our unwavering commitment is to work diligently towards improving these conditions. Our goal is to offer a range of housing that is not only affordable but also safe and suitable for our community's needs.

#### **Exhibit D Soundness of Approach**

Our vision for the City of Muskegon is to build a community that is vibrant, affordable, and ethnically diverse. Through this proposal, we hope to further our efforts toward achieving our vision by cleaning up blight, reducing segregation, creating infill housing for buildable lots, and improving low-income household access to affordable housing. This proposal aligns with the Muskegon City Commission's Strategic Plan, the current Consolidated Plan, and will help further those objectives by addressing the needs identified in the Analysis of Impediments Study (2023) and Housing Needs Assessment (2023).

If awarded, we intend to use the grant funds as detailed below:

(iv.B) Establishing loan or grant programs with affordability requirements or other mechanisms for rehabilitation of existing affordable units

(iv.G) Establishing an affordable housing preservation seed fund

\$3.5 million - Housing Preservation Fund

- \$1.5 million for rental rehabilitation
- \$2 million for owner occupied rehabilitation

Sections iv.B. and G of the NOFO allows for the establishment of loan or grant programs with affordability requirements or other mechanisms for rehabilitation of existing affordable units and the establishment of an affordable housing preservation seed fund. These activities meet two national objectives by preventing or eliminating slums or blight, and the low-mod income benefit. These support our plan to use \$1.5 million for the rehabilitation of affordable rental units with long-term affordability requirements, as well as the \$2 million seed fund for owner occupied housing preservation for low-mod income homeowners.

Establishing an Affordable Housing Preservation Seed Fund with dedicated funding for both rentals and owner-occupied properties provides a financial cushion to address immediate repair needs and preserve affordability. This fund will be used for critical repairs, ensuring that existing affordable housing remains habitable and accessible. In addition, the rental rehabilitation funds will be used to improve living conditions for low-income renters, by improving property standards and code compliance within rental properties while securing the property with legal mechanisms to ensure long term affordability.

The City of Muskegon has recognized a pressing need for housing repairs, as evidenced by the numerous applications received through the Community Neighborhood and Services Department. With over 410 households in the past five years provided home repairs, and continued waitlists for service, it is more apparent than ever that the need to preserve housing stock is present and pressing. Owner-occupied and rental rehabilitation programs play a vital role in enhancing a community's housing quality, fostering neighborhood stability, and improving homeowners' living conditions. These programs are instrumental in assisting homeowners in maintaining and upgrading their properties, thereby contributing significantly to overall community development and revitalization efforts. It achieves this by addressing the preservation

needs of existing rental units and owner-occupied homes which contributes to averting displacement, ensuring housing stability, and promoting neighborhood revitalization.

The City of Muskegon has facilitated rental rehabilitation in the past through its HOME Investment Partnerships Program. By imposing affordability requirements, the program has been able to establish long-term affordable rental units throughout the period of affordability. In addition, it has established tenant protections in the form of implementing the Violence Against Women Act (VAWA) protections, lease reviews, and improved equal housing opportunity. The ability to fund a rental rehabilitation program through this proposal will allow for more flexibility to preserve affordable rental units, improve rental compliance by allowing for a mechanism to get assistance with repairs, and help protect tenants through lease reviews and affordability requirements.

(ii.A, B) Financing the construction or rehabilitation of affordable housing, Acquisition or disposition of land or real property for the development of affordable housing

- \$1 million Acquisition/Rehab/Resale and nonprofit capacity building
- \$4.5 million New Construction (\$2 million match)
- \$.5 million Acquisition of land/real property (\$.5 million match)

Section ii.A & B authorizing the financing of construction or rehabilitation of affordable housing and acquisition of land, supports our request for \$4.5 million for new construction, \$.5 million for acquisition, and \$1 million for capacity building experience for local nonprofits. We will use those funds to support projects that create affordable housing from local nonprofits to build local capacity toward future development.

Financing the construction and rehabilitation of affordable housing units is vital. This will increase the overall supply of affordable housing, which is especially important in areas where housing costs are rising rapidly. Funds for nonprofit capacity building also empower organizations to take an active role in addressing housing challenges. This will address two needs identified for our community: assisting with development costs and creating more affordable housing.

(iv.L) Providing homebuyer education, assistance, appraisal programs, and other educational programs for LMI residents

• \$500,000 for homebuyer down payment assistance

Section iv.L. of the NOFO allows for the provision of homebuyer education, assistance, appraisal programs, and other educational programs for low/mod income residents. This meets the CDBG national objective for low/mod income person benefit. Our plan requests \$500,000 to assist low/moderate income homebuyers with the purchase of homes created through the program. Providing Homebuyer Assistance is necessary to provide low-income citizens with the support they need to become homeowners. By mirroring our current HOME Investment

Partnerships Program funded down payment assistance program, we will be able to assist households toward achieving sustainable homeownership.

Federal assistance programs play a pivotal role in mitigating homelessness, alleviating poverty, and enhancing the well-being of both adults and children. Expanding and fortifying these programs while facilitating greater housing choice for low-income families could extend these invaluable benefits to a broader swath of households.

In an article by Marvin M. Smith titled "Spotlight on Research: Down Payment Assistance Plays Critical Role in Affordable Homeownership," the aftermath of the 2008 financial crisis triggered a rigorous examination of mortgage policies, particularly focusing on the necessity of down payment requirements as a safeguard against defaults. As witnessed nationwide, stringent down payment prerequisites can serve as formidable obstacles to homeownership, especially for individuals with lower and moderate incomes (LMI) who encounter challenges in amassing the essential funds. In this context, down payment assistance programs have demonstrated a substantial impact on the homeownership rates among low-income and minority households. A study conducted by Freeman and Harden delved into data sourced from the Community Advantage Panel Survey, concentrating on loans originated between 1999 and 2003 for LMI homeowners. The primary aim of their research was to unravel the intricate relationship between down payment assistance and the factors influencing its utilization. The following key findings emerged:

- Disparities in income, family structures, and the capacity of parents to provide financial support play pivotal roles in determining access to down payment assistance.
- Existing literature corroborates these findings, suggesting that these disparities contribute significantly to the homeownership gap between aspiring white and black homeowners.
- When examining Hispanic, black, and white homeowners, it was observed that Hispanic homeowners were least likely to receive down payment and closing cost assistance from sellers or real estate agents.
- In contrast, black homeowners were less likely to secure down payment and closing cost assistance from family members or friends.
- However, black homeowners were more likely to report the use of grants for down payment and closing cost assistance.

Furthermore, the utilization of assistance can serve as a means of liberating homeowners' savings, providing them with the flexibility to access their resources as needed to fulfill their mortgage obligations. This supports our notion that assisting LMI populations toward purchasing a home can create equity in the purchasing process and help low-income homebuyers make homebuying a reality.

Displacement can be a harmful by-product of development, if proper stops aren't in place to prevent it. To prevent displacement, the City of Muskegon will uphold its current Residential Anti-Displacement and Relocation Assistance Plan (RARAP) for all PRO Housing funded projects. By upholding this policy, we will ensure that new and improved housing is produced without displacing the current populations by redevelopment or pricing out by making areas

unaffordable. The Headlee tax limitation assists in preventing displacement, as it caps the amount property taxes can increase for homeowners, which allows for more development without pricing current residents out of their homes. The May 2018 report from the HUD Office of Policy Development and Research that addresses Displacement of Lower-Income Families in Urban Areas described four strategies that "could address displacement of lower-income families and long-time residents in urban areas and alleviate the pressures on housing affordability and community resistance to change." Our proposal brings to fruition three of the four strategies by preserving existing affordable housing, encouraging greater housing development including but not limited to affordable housing, and engaging existing residents.

The proposal aligns with our current goals and initiatives. The first goal is to provide more affordable housing throughout the city, as documented in the City Commission's 2022-2027 Vision. In 2022, the city amended the zoning ordinance to reduce the minimum house size from 850 square feet (sf) to 550 sf in an effort to reduce housing costs. We have recently approved plans for new houses as small as 580 sf which have significantly reduced the costs for a new house. In addition, the City Commission amended the zoning ordinance in 2017 to reduce the size of buildable lots. At the time, most lots needed to have at least 50 ft of street frontage and a total of 6,000 sf to be considered buildable. The amendment reduced the requirements for many lots to only need to have 30 feet of street frontage and a total of 3,000 sf. This reduction on lot size requirements created many new buildable lots throughout the City and has allowed us to create a city-owned lot sale policy that incentivizes housing development and took a step in the right direction toward mitigating the harmful effects of residential zoned areas, with their expansive lots that are largely unaffordable to many. The City-owned lot sale policy incentivizes the construction of new housing, especially multi-family housing, on City-owned lots. Reduced lot prices and water/sewer connection charge reductions are provided to those that meet certain criteria, to provide quality affordable housing.

This proposal also aligns closely with the current efforts undertaken by our Economic Development Department to create infill housing on vacant lots, as well as our extensive repair, rehab/resale, and down payment assistance program offerings through the Community and Neighborhood Services department. Lessons learned from these efforts informed our decision making to pursue the specific initiatives in this proposal. Through our Infill Housing program, we identified a need to subsidize the purchase of homes for homebuyers with lower incomes to make homeownership more sustainable. While providing incentives and subsidies to produce new units is necessary, we have found that the expansion of our down payment assistance program produces monthly mortgage payments that are less than market rents in the area. In addition, we realized that there is a significant need for more housing rehabilitation for the homeowners. With each new program that we offer, our waitlists fill within weeks, and we find our funds tapped quickly. By adding a seed fund for rehabilitation through the PRO Housing program, we will be able to expand our services and preserve the housing stock of our community for low-income homeowners. Geographically, PRO Housing Activities will focus on the City of Muskegon. More specifically, we will target our new construction activities to vacant buildable city-owned lots throughout the city, where housing affordability is a major concern and a pressing need, as documented in the Housing Needs Assessment. We will seek to acquire land within high-opportunity neighborhoods like Nelson, Lakeside, and Beachwood-Bluffton, to ensure all areas of our city benefit from affordable housing initiatives. By using this data as a guide, we are better poised to meet the housing needs of our community in the future and immediately. Repair and acquisition assistance programs will be available throughout the City of Muskegon, with no limitation to specific neighborhoods.

The key stakeholders of our community include residents, housing developers, businesses, landlords, government officials/staff, and nonprofit organizations. Our stakeholders were engaged in a housing survey by Bowen National Research that was conducted as part of our Housing Needs Assessment. We used the results from that survey to inform the decision to apply for these funds, and what programming to provide. To gain information, perspective and insight about the City of Muskegon's housing issues and the factors influencing housing decisions by its residents, developers and others, Bowen National Research conducted targeted surveys of three specific groups: Stakeholders, Employers, and Residents/Commuters. These surveys were conducted during December of 2022 through January of 2023 and questions were customized to solicit specific information relative to each segment of the market that was surveyed. In total, nearly 1,800 survey responses were received from a broad cross section of the community. Across the board, respondents expressed overwhelmingly that housing is not affordable, not available, and in substandard condition. We heard this feedback and are requesting these funds to assist in making the changes needed to support our community. We seek to further engage our stakeholders through the public hearing and comment period required by this grant which will be available for public review/comment October 12, 2023 through October 29, 2023, with a public hearing being held on October 24, 2023. If awarded, a webpage will be created on our city website that provides information accounting for how all grant funds are used, managed, and administered. It will include details of all contracts and ongoing procurement policies, and a dashboard documenting progress toward goals, and expenditures.

We value citizen participation and have made great strides in the past year to improve our efforts. By creating and filling a Community Engagement Manager position, work began to create and implement a Community Engagement Plan, which relies on a framework for public participation that maximizes involvement, and targets communication to our citizens. We have optimized our programming by using social media channels, print newsletters, electronic communication, and ZenCity engagement pages to encourage participation and expand our reach with communications.

Our plan will affirmatively further fair housing by transforming struggling areas of our city into areas of opportunity and providing affordable housing in the areas of opportunity that already exist. Available units that are developed with this funding will be subject to the City of Muskegon's Affirmative Marketing Plan and will be advertised to ensure those least likely to

apply for assistance are notified of the opportunities available. The goal is to deconcentrate affordable housing to specific sites throughout the city. The City of Muskegon has partnered for years with the Fair Housing Center of West Michigan to study and educate on fair housing issues in our community. In addition, the City of Muskegon has been awarded funding from the Fair Housing Center of West Michigan from their historic settlement with Fannie Mae alleging neglect for properties in census tracts that predominately contain people of color. The city is providing housing rehabilitation, beautification grants, and neighborhood grants to these areas to mitigate the effects of historical racism. All of the proposed actions align with the 2023 Analysis of Impediments study that identified a need for preservation of affordable housing, and production of new units. In addition, it emphasizes the importance of implementing form-based code to ensure diverse housing options are produced.

We anticipate the racial demographics of those benefiting from our proposed grant activities to reflect the beneficiaries of our current programming:

- Homebuyer Assistance 34% Black/African American, 59% White, 5% Hispanic/Latino
- Home Repairs 51% Black/African American, 44% White, 3% Hispanic/Latino

The City of Muskegon is considered an area of "High Segregation" according to the Othering and Belonging Institute, a reality that is unacceptable. The zoning of much of our city as singlefamily residential has been a contributing factor to this. The racist and classist history tied to zoning areas as single-family residential with large areas of land being considered one buildable lot in our country has historically been a means to limit diversity of housing option and race, combined. The separation created by single-family residential zoning created space for disinvestment in predominately black neighborhoods, and eventually blight. In a landmark settlement with Fannie Mae, Fair Housing Centers alleged that Fannie Mae conducted unfair housing practices by not marketing or maintaining properties in predominately black areas. This proved to be true for the City of Muskegon as well. Zoning like this demonstrates a concerted effort to separate races, and housing types which we seek to remedy today. Our efforts to further rezone these areas of our city into form based code will help right these historical wrongs, by including multiple types of housing on smaller lots. In addition, it will provide current homeowners the opportunity to build wealth by adding accessory dwelling units, if desired. By providing for more flexibility and freedom to use land effectively, we will make strides toward furthering fair housing and remedying the wrongs of the past.

By including funding for acquisition of land/real property, we expand the scope of our proposal to all neighborhoods within the City of Muskegon, including the predominately white, affluent communities on the west side of our city. This will allow for people in need of affordable housing to choose their location within the city, instead of being concentrated in lower-income census tracts. This furthers our goals of desegregation and housing choice.

Units produced, rehabilitated, and repaired will vary in size and type. We anticipate serving primarily single-family residential homes of individuals with disabilities with our home repair program, as that is reflective of the current demographic trends of our existing home repair

programs. In addition, units created and rehabilitated will vary in size and type to accommodate those with special needs, and various family structures.

The City of Muskegon will oversee all aspects of the projects it funds through this award. This includes project approval, drafting policies for programming, planning, environmental review, monitoring of rental properties for long-term affordability, and public engagement. Through transparency, planning and proactive communication, we hope to avoid much resistance to the proposed activities. We will work to get ahead of any potential resistance from the public by informing them of our activities through our website and public engagement. With most communities in the process of changing, the City of Muskegon is no stranger to the "Not in My Back Yard" (NIMBY) barrier to affordable housing. Often, everyone can agree that affordable housing should exist, but seldom do individuals want it near them, another way in which low-income neighbors are "othered" by society. We will work to engage the public and notify them of our actions in an effort to combat this ideology. We will be sure to complete environmental review of proposed sites to target ones that will ensure the home is sustainable, even with the risks to come with climate change.

All units that will be created, rehabilitated, or repaired by this grant will be subject to a minimum five-year period of affordability that is subject to change based on the amount of assistance provided, to ensure funds are continuing to benefit low-income populations. This will be enforced through lien, deed restriction, or other approved methods.

We plan to engage and support minority-, women-, and veteran-owned businesses during our proposed housing production process. Our Purchasing Policy established goals of 14% minority owned and 7% women owned businesses for contractor participation. We will provide preference points in the review of bids and proposals for construction to contractors that meet these goals. We are committed to promoting diversity and equity in all aspects of our projects.

## Evaluation

To effectively evaluate the impact of our proposal on promoting desegregation, expanding equitable access to well-resourced areas of opportunity, and furthering the de-concentration of affordable housing, a comprehensive and data-driven approach will be adopted. We will track the following information:

- Demographic and income information for beneficiaries of programming
- Number of units created in high opportunity areas
- Number of units assisted with preservation activities
- Census tracts of units

Using this information, we will assess:

• Changes in the racial and socio-economic composition of neighborhoods benefitting from housing activities

- Collect data on the availability and affordability of housing in target areas before and after the implementation of the proposal.
- Track housing costs in benefitting neighborhoods/census tracts
- Track participation in the Housing Choice Voucher program
- Monitor indicators such as property values, crime rates, and infrastructure improvements.
- Develop and track specific metrics related to housing policy goals, such as the number of affordable housing units created or preserved, the percentage of affordable units in mixed-income developments, and the success of inclusionary zoning policies.

As stated previously, all units that are produced by this program will be subject to the City of Muskegon' Affirmative Marketing Plan that is currently used for any units produced through the HOME Investment Partnerships Program. This includes but is not limited to the following provisions:

- Displaying the Equal Housing Opportunity logo on all applications, press releases, solicitations, and written communications.
- Publishing housing opportunities online, in print, and on social media channels.
- Being present and community events and community centers to inform the public about housing opportunities.
- Informing neighborhood associations, the Citizen's District Council, and other boards/commission of housing opportunities.
- Utilizing community resource hubs to advertise, including churches, nonprofit organizations, employment centers, housing counseling agencies, realtors, etc.

All developers, subrecipients, partners and the like will be required to write and implement an affirmative marketing strategy that is approved by the City of Muskegon before funds are committed to any project.

## Budget

The budget for our proposal is based on our request for \$10 million in PRO Housing funds, and a \$2.5 million match from our Public Improvement fund. The breakdown is as follows:

Analysis of Total Estimated Costs		Estimated Cost	Percent of Total
	Personnel (Direct		
	1 Labor)	400,153.00	3.2%
	2 Fringe Benefits	214,882	1.7%
	3 Travel	0.00	0.0%
	4 Equipment	0.00	0.0%
	Supplies and		
	5 Materials	0.00	0.0%
	6 Consultants	0.00	0.0%
	Contracts and		
	7 Sub-Grantees	0.00	0.0%
	8 Construction	11,384,965.00	91.1%
	Other Direct		
	9 Costs	500,000.00	4.0%

10	Indirect Costs		0.00	0.0%
	Total:		12,500,000.00	100.0%
			\$10,000,000.0	
		Federal Share:	0	80%
		Match		
		(Expressed as a		
		percentage of the Federal Share):	25%	

The estimated personnel costs will fund three staff members that will manage the grant and its associated programming. The hourly estimates are provided for the five-year period of performance with an additional 7 months for closeout and finalization of activities. The Grants Program Coordinator is estimated to spend 2,600 hours, the Development Analyst will invest 1,300 hours, and a full-time Community Development Specialist will be added to manage the repair programs offered by this proposal, spending 10,400 hours over of life the grant. Administration and oversight will be provided by the Director of Development Services and Director of CNS, with no cost attributed to the grant.

Wages and fringe rates were calculated based on current wages for filled positions, and anticipated wages for the Community Development Specialist. Composite fringe rates were used which combine variable and flat fringe benefit rates. Variable fringe rates consist of 0.38% for long-term disability, 0.45% for life insurance, 3% for retirement healthcare savings plans, 9% for 457 retirement plans 6.2% for Social Security, and 1.45% for Medicare. While flat consist of health insurance premiums and dental insurance.

The bulk of the award and match fall into the Construction category, with line items for acquisition (\$500,000 PRO Housing, \$500,000 match), Preservation activities (\$3,314,965 PRO Housing), and New Construction/Rehab-Resale (\$5,070,000 PRO Housing, \$2 million match). These pools of funding will be utilized as direct costs for the activities contained in this proposal. In accordance with the City of Muskegon's Purchasing Policy, all construction, rehabilitation, and repair work will be subject to the Request for Proposals process and competitive bidding, respectively. This will ensure the most reasonable, responsible, and cost-effective bid is selected to further our objectives. An estimated 65 new/rehabilitated units are anticipated to be developed based on cost estimates for infill housing conducted in prior projects through the City of Muskegon. Preservation activities are expected to generate repairs of 215 units, estimating a \$15,000 investment per unit. Other direct costs include the \$500,000 in PRO Housing funds for homebuyer down payment assistance.

A partial award would lead to a reduction in the scale of the proposed activities. If awarded a portion of the requested amount, we would prioritize funding new construction of affordable units, should the award warrant that investment. If awarded only 50% of our request, we would fund the new construction portion of our proposal, to create an influx of affordable units in our community. The minimum funding amount that would allow us to make progress on our goals would be \$5 million. However, this would prevent us from adding addition preservation and down payment assistance activities.

**Timeline -** All activities will be launched within 60 days of award, after Action Plans and negotiations are concluded. Our proposed timeline and goals are as follows:

### Year 1 January 2024-December 2024

- 0-90 days Complete and publish Request for Proposals for construction activities. Identify Rehab/Resale projects. Create and launch preservation programs.
- 90-120 days Select developer/CBO that will complete new construction projects.
- Remainder of year Complete and sell 13 homes.
- Preservation goal 15 units

## Year 2 January 2025-December 2025

- Continue preservation program 50 unit goal
- Rehab/New Construction Produce and Sell-15 units

## Year 3 January 2026-December 2026

- Continue preservation program 50 unit goal
- Rehab/New Construction Produce and Sell-15 units

## Year 4 January 2027-December 2027

- Continue preservation program 50 unit goal
- Rehab/New Construction Produce and Sell-15 units

## Year 5 January 2028-December 2028

- Continue preservation program 50 unit goal
- Rehab/New Construction Produce and Sell-7 units

## Year 6 January 2028-September 2029

• Grant closeout

#### **Exhibit E Capacity**

This application was written by City of Muskegon Staff, Stevie Parcell, Grants Program Coordinator and Contessa Alexander, Development Analyst. The City of Muskegon will facilitate oversight and contracting for the proposed activities of this NOFO. Development of new construction will be procured in accordance with the City of Muskegon's Purchasing Policy, and the Request for Proposals procedure contained within. Administrative oversight and management will be provided by the Director of Development Services, Jake Eckholm and the Director of Community and Neighborhood Services, Sharonda Carson. Program activities, monitoring, and financial management will be conducted by Stevie Parcell, Grants Program Coordinator, Contessa Alexander, Development Analyst, and Financial Manager, Hayden Nickell. One additional staff member will be hired as a Community Development Specialist to facilitate the home rehabilitation program.

As an entitlement community, the City of Muskegon has years of experience administrating multiple housing rehabilitation programs and federal awards simultaneously that have successfully supported homeowners and renters alike in our community through the use of HUD funds and other grants. Over the past three years we have achieved success in lead abatement and interim controls, healthy homes production, improving energy efficiency through the DTE Program, priority home repairs to local homeowners, rental rehabilitation, and supporting seniors with necessary home repairs. All of these programs operate to improve the living conditions of hundreds of households in the City of Muskegon and County as a whole.

The City of Muskegon's Development Services Division, through its Economic Development and Planning Departments, has extensive experience in purpose-built infill housing. Since 2019, the City has contracted and constructed over 150 units of for-sale and for-rent housing products. All of these units have had affordability and subsidy components in their development agreements, and city staff has managed multiple design/build/sell projects that have resulted in the only new construction site-built housing under \$200,000 in the State of Michigan in recent years. We have particularly strong in-house expertise and experience managing development contracts for affordable housing, both in the Low-Income Housing Tax Credit space as well as our own self-funded infill projects.



#### **Organizational Chart**

**Director of Development Services** – This role is responsible for oversight of new construction and rehabilitation activities and staff.

**Development Analyst** – This role will monitor new construction and rehabilitation projects, track beneficiary data, and draft reports for the public PRO Housing website.

**Director of CNS** – This position is responsible for overseeing CNS Department staff that are implementing programming.

**Grants Program Coordinator** – This role facilitates agreements with nonprofit entities, and down payment assistance. They are responsible for completing necessary reporting to HUD. They monitor budgets, and long-term affordability measures for beneficiaries.

**Community Development Specialist** - One new position will be added to the existing management structure, a full-time Community Development Specialist. This person will administer the home repair portion of the grant by accepting and processing applications, soliciting bids, and coordinating work/payment.

#### **Exhibit F Leverage**

The City of Muskegon is committed to producing affordable housing for its citizens. As such, in a unanimous vote by the City Commission, \$2.5 million in leveraged public improvement funds have been committed to this PRO Housing proposal in support of the initiatives within. Funds will be used to increase the impact of the housing production funds by \$2 million, and land acquisition by \$500,000.

#### **Exhibit G Long-Term Effect**

Our goal is to create approximately 65 units of affordable housing through rehabilitation and new construction. Units available for purchase will be sold to low-income homebuyers with assistance by the down payment assistance part of our proposal. We anticipate being able to provide repairs to approximately 215 affordable rental and homeowner units throughout the city during the grant period. These efforts will increase the affordable housing stock in our community and preserve existing affordable housing for the future. By targeting sites with access to transportation and amenities, we will reduce the housing cost burden on low-income families without increasing other costs. This will represent a model for other communities by demonstrating preservation and creation of affordable housing in tandem with support for sustainability. Success would entail the conversion of the three target neighborhoods to form based code: urban residential, the creation of 65 rehabbed/new units, 215 affordable units provided with home repairs, less segregation within the impacted neighborhoods, and a climate that nurtures development within the city of Muskegon. We plan to promote this success by using these funds to establish a foundation of development within high opportunity areas and areas of need in tandem to increase housing choice for low- and moderate-income citizens.

One of the greatest roadblocks to our proposal is the limited understanding of form-based code, despite multiple public engagement opportunities and the benefits it affords. The passage of form-based code to other areas of our city will allow for more freedom for current landowners, more opportunity, and more flexibility to meet the needs of the community. Our goal is to rezone all single-family properties in the Jackson Hill, McLaughlin and Angel neighborhoods to FBC, urban residential, nearly 2500 parcels. This will start to remedy of historically racist and classist single-family zoning that has limited housing choice in our community and many others across the United States. This might persist despite our proposal, but we are prepared to phase construction to allow for time for these measures to pass. Should the resistance still persist, we will plan on focusing new construction in areas that allow for flexibility in housing types, and target rehabilitation to the other neighborhoods.

## Budget

	rant Application Detailed Budget Worksheet										
Applicant Name	: City of Mus	skegon									
Applicant Address	s: 933 Terrac	e Street									
	Muskegon	, MI 49440									
Category				Detailed Description of Budget (for fu	ull grant period)						
	Estimated	Rate per			Applicant Match	Other HUD Funds	Other Federal	State Share	Local/Tribal Share	Other	Program Income
1. Personnel (Direct Labor)	Hours	Hour	Estimated Cost	HUD Share			Share				_
Position or Individual	0.000	<b>6</b> 00.04	<u> </u>								
Grants Program Coordinator	2,600	\$33.24	\$86,424								
Development Analyst	1,300	\$34.29	\$44,577	\$44,577							
Community Development Specialist	10,400	\$25.88	\$269,152	\$269,152							
Total Direct Labor Cost			\$400,153	\$400,153	\$0	\$0	\$0			\$0	\$(
					Applicant Match	Other HUD	Other	State Share		Other	Program
0 Friend Departite	D-1- (9/)	Dees	Estimated Orac			Funds	Federal		Share		Income
2. Fringe Benefits Grants Program Coordinator	Rate (%) 32.96%	Base \$86,424	Estimated Cost \$28,485	HUD Share \$28,485			Share				
	50.92%	\$44,577									
Development Analyst		. ,	\$22,699	\$22,699							
Community Development Specialist	60.82%	\$269,152	\$163,698	\$163,698							
Total Fringe Benefits Cost			\$214,882	\$214,882	\$0	\$0	\$0	\$0	\$0	\$0	\$

Grant Application Detailed Budg									OMB Approval No Expiration: 1/31/20		
Applicant Name:	City of Mu	skegon									
3. Travel											
3a. Transportation - Local Private Vehicle	Mileage	Rate per Mile	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Trans - Local Private Vehicle					Applicant Match	Other HUD Funds	Other Federal	State Share	Local/Tribal Share	Other	Program Income
3b. Transportation - Airfare (show destination)	Trips	Fare	Estimated Cost	HUD Share			Share				
Subtotal - Transportation - Airfare					Applicant Match	Other HUD	Other	State Share	Local/Tribal	Other	Program
3c. Transportation - Other	Quantity	Unit Cost	Estimated Cost	HUD Share		Funds	Federal Share		Share		Income
Subtotal - Transportation - Other											
3d. Per Diem or Subsistence (indicate location)	Days	Rate per Day	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Per Diem or Subsistence											
Total Travel Cost 4. Equipment (Only items over \$5,000 Depreciated value)	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
	scountry						Unale				
Total Equipment Cost											

Grant Application Detailed Bu	udget Work	sheet							OMB Approval No Expiration: 1/31/2		
Applicant Na	ame: City of Mus	skegon									
5. Supplies and Materials (Items under \$5,000	Depreciated Value	)			Ann Kanad Madah	OthersLIUD	Other	00	Land/Taibal	Other	D
5a. Consumable Supplies	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
				-							
Subtotal - Consumable Supplies					Applicant Match	Other HUD Funds	Other Federal	State Share	Local/Tribal Share	Other	Program Income
5b. Non-Consumable Materials	Quantity	Unit Cost	Estimated Cost	HUD Share		Fullus	Share		Share		Income
				-							
Subtotal - Non-Consumable Materials Total Supplies and Materials Cost											
	Dava	Bata nan Dav	Estimated Cost		Applicant Match	Other HUD Funds	Other Federal	State Share	Local/Tribal Share	Other	Program Income
6. Consultants (Type)	Days	Kate per Day	Estimated Cost	HUD Share			Share				
Total Consultants Cost				\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$(
7. Contracts and Sub-Grantees (List individual	lly)						÷-	,	, <del>,</del> , ,	T - 1	
7a. Contracts	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtatal Contracto				\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Subtotal - Contracts				\$0	Applicant Match	00 Other HUD Funds	0ther Federal	\$U State Share		<del>۵</del> 0 Other	ېر Program Income
7b. Sub-Grantees (List individually)	Quantity	Unit Cost	Estimated Cost	HUD Share		i unus	Share		Unare		moorne
Subtotal - Sub-Grantees				\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$
Total Contracts and Sub-Grantees Cost				\$0						\$0 \$0	<del>ېر</del> \$(

Grant Application Detailed Budg									OMB Approval No Expiration: 1/31/2		
Applicant Name:	City of Mus	skegon			1						
8. Construction Costs	1						0.1				_
					Applicant Match	Other HUD Funds	Other Federal	State Share	Local/Tribal Share	Other	Program Income
8a. Administrative and legal expenses	Quantity	Unit Cost	Estimated Cost	HUD Share		Funds	Share		Share		Income
·····							enare				
Subtotal - Administrative and legal expenses							01			01	
					Applicant Match	Other HUD Funds	Other Federal	State Share	Local/Tribal Share	Other	Program Income
8b. Land, structures, rights-of way, appraisal, etc	Quantity	Unit Cost	Estimated Cost	HUD Share		i unus	Share		Onare		moorne
Land Acquisition	20	25000	\$500,000	500000	500000						
	L										
				<b>\$500.000</b>	¢500.000	<b>*</b> ^	<b>^</b>	<b>*</b> 0	<b>*</b> ^	<b>^</b>	
Subtotal - Land, structures, rights-of way,	1			\$500,000	\$500,000 Applicant Match	\$0 Other HUD	\$0 Other	\$0 State Share		\$0 Other	\$ Program
					Applicant Water	Funds	Federal	State Shale	Share	Other	Income
8c. Relocation expenses and payments	Quantity	Unit Cost	Estimated Cost	HUD Share			Share				
Subtotal - Relocation expenses and payments											
Subtotal - Relocation expenses and payments					Applicant Match	Other HUD	Other	State Share	Local/Tribal	Other	Program
					, applicant materi	Funds	Federal		Share	o unon	Income
8d. Architectural and engineering fees	Quantity	Unit Cost	Estimated Cost	HUD Share			Share				
					-						
Subtotal - Architectural and engineering fees					1						
					Applicant Match	Other HUD	Other	State Share		Other	Program
						Funds	Federal		Share		Income
8e. Other architectural and engineering fees	Quantity	Unit Cost	Estimated Cost	HUD Share			Share				
			<u>}</u>								
			1		1						
		L									
Subtotal - Other architectural and engineering fees											
					Applicant Match	Other HUD	Other	State Share	Local/Tribal	Other	Program
of Drainat increation face	Quentitur	Unit Coot	Entimated Cost			Funds	Federal		Share		Income
8f. Project inspection fees	Quantity	Unit Cost	Estimated Cost	HUD Share			Share				
	1	-			1						
Subtotal - Project inspection fees	1		1		1			1	1 1		

Grant Application Detailed Budg	et Works	sheet							OMB Approval No Expiration: 1/31/20		
Applicant Name:	City of Mus	skegon							Expiration: 1/31/20	026	
Applicant Name.	City of Mus	skegon			Applicant Match	Other HUD	Other	State Share	Local/Tribal	Other	Program
8g. Site work	Quantity	Unit Cost	Estimated Cost	HUD Share		Funds	Federal Share		Share		Income
by. Site Work	Quantity	Unit Cost	Estimated Cost				Silale				
Subtotal - Site work											
					Applicant Match		Other	State Share	Local/Tribal Share	Other	Program
8h. Demolition and removal	Quantity	Unit Cost	Estimated Cost	HUD Share		Funds	Federal Share		Share		Income
Subtotal - Demolition and removal											
					Applicant Match	Other HUD	Other	State Share	Local/Tribal	Other	Program
						Funds	Federal		Share		Income
8i. Construction Owner-Occupied Repair & Rental Repair	Quantity 215	Unit Cost 15000	Estimated Cost \$3,314,965	HUD Share 3314965			Share				
New Construction/Whole Home Rehab	65	Varies	\$5,070,000	5070000	2000000						
New Construction/ Mole Home Renas		Turioo	<i><b>t</b></i> ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	0010000	2000000						
Subtotal - Construction				\$8,384,965			\$0	\$0	\$0	\$0	\$
					Applicant Match	Other HUD Funds	Other Federal	State Share	Local/Tribal Share	Other	Program Income
8j. Equipment	Quantity	Unit Cost	Estimated Cost	-			Share				
Subtotal - Equipment											
					Applicant Match	Other HUD	Other	State Share	Local/Tribal	Other	Program
8k. Contingencies	Quantity	Unit Cost	Estimated Cost	HUD Share		Funds	Federal Share		Share		Income
Subtotal - Contingencies											
<u>.</u>					Applicant Match	Other HUD	Other	State Share	Local/Tribal	Other	Program
8I. Miscellaneous	Quantity	Unit Cost	Estimated Cost	HUD Share		Funds	Federal Share		Share		Income
Subtotal - Miscellaneous											
Total Construction Costs			\$11,384,965	\$8,884,965	\$2,500,000				<u> </u>		

Grant Application Detailed Budg	et Work	sheet							OMB Approval No Expiration: 1/31/2		
Applicant Name:	City of Mus	skegon									
					Applicant Match	Other HUD Funds	Other Federal	State Share	Local/Tribal Share	Other	Program Income
Other Direct Costs Quantity Unit Cost		Estimated Cost	HUD Share			Share					
Item	65	7692.3	\$500,000	\$500,000							
Downpayment Assistance	60	7092.3	\$500,000	\$500,000							
								1			
						1					
						† †					
Total Other Direct Costs			\$500,000	\$500,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		•									
Subtotal of Direct Costs			\$500,000	\$10,000,000	\$2,500,000						
					Applicant Match		Other	State Share	Local/Tribal	Other	Program
10. Indirect Costs	Rate	Base	Estimated Cost	HUD Share		Funds	Federal Share		Share		Income
Type	Nate	Dase	Estimated 00st	TIOD Share			Share				
1990						1					
Total Indirect Costs											
Total Estimated Costs			10000000								