

# City of Niles



FINAL

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PY 2017

## (October 1, 2017– September 30, 2018) Community Development Block Grant Annual Action Plan

Posted for Public Comment: June 24 2017  
Scheduled for Presentation to City Council: Monday, July 24 2017  
Approved by City Council: Monday July 24 2017

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2017 CDBG Annual Action Plan with Unapproved Substantial Amendment  
February 16 2018

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# Executive Summary

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

### 1. Introduction

Currently, the City of Niles expects to receive an estimated \$249,333 in funding from the U.S. Department of Housing and Urban Development under the program year 2017 Community Development Block Grant Program. Funds from this program are expected to be available for the period October 1, 2017 through September 30, 2018. It is estimated that an additional \$30,000 of funds will be reprogrammed from PY16 for distribution and use during PY17.

Like many communities, Niles continues to be affected by economic stagnation and decreasing revenues. The City of Niles intends to use its CDBG allocation for verifying elimination, public facilities, code enforcement activities, public services and administration of the CDBG program. The preferred outcome for this submission of the City of Niles, Michigan's Annual Action Plan focuses on creating a safe, decent and suitable living environment for the citizens of Niles – particularly for low and moderate-income persons living within a designated Low-Moderate Income Area (LMA) within the City.

### 2. Summarize the objectives and outcomes identified in the Plan

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

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As detailed within the City's active and approved Consolidated Plan, the purpose of this Plan is to establish and define projects and programs to be supported by Community Development Block Grant funds. The following is a summary of active goals:

- Support Public Services for Youth and ELI Persons
- Provide Adequate LMI Area Infrastructure
- Blight Elimination
- Historic Preservation
- Support Fair Housing Practices
- Support Public Facilities- Installation or Rehab

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

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

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Over the past four years, the City has focused on funding projects in targeted areas. Focusing specifically on neighborhoods with schools, increased youth and/or increased numbers of ELI households, the City has provided targeted code enforcement, park, street and sidewalk improvements, owner-occupied home rehabilitation assistance, public services and technical assistance as a means of increasing the overall impact of its HUD funding, placing as many resources as possible directly into specific areas. Additionally, the City has been allocating resources for youth related services in an effort to groom economic regeneration over the next generation.

While Niles residents continue to face many interrelated social issues such as poverty; overspending on affordable housing; substandard/blighted housing; higher incidence of criminal activity; and a need for support services, we are seeing renewed community pride, especially among the youth population, as efforts to include young people in planning and program activities has developed a sense of community that may have been waning for a number of years.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The City of Niles will follow the HUD standards for Citizen Input as described in 24 CFR Part 91 Sec. 91.105: Citizen Participation Plan; Local Governments. These steps were taken to ensure that any City of Niles resident wishing to comment on the Annual Action Plan will have that opportunity:

1. Scheduling of Public Hearing June 27 2017  
Notice of Public Hearing Placed in Newspaper June 26, 2017  
The public was notified and encouraged to make comments on the summary of the proposed Annual Action Plan for no less than 30 days.
2. Annual Action Plan Made Publically Available on the City's website, City Hall and at the Niles District Library June 26 2017  
No comments were received by the Community Development Director and the City Administrator.
3. Public Hearing Held July 10 2017  
No comments were received by the Community Development Director and the City Administrator.
4. Consideration of Approval by the City of Niles, City Council July 24 2017

5. Prior to August 15, 2017, the Annual Action Plan will be submitted to HUD for review and approval.

**5. Summary of public comments**

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

No comments were received by the Community Development Director and the City Administrator.

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

No comments were received by the Community Development Director and the City Administrator.

**7. Summary**

Through priorities outlined in this Plan, the impact of any federal funds received by the City will be maximized through a focused approach to addressing community needs and delivering services to the low and moderate income residents of Niles. The goals and objectives of the Plan will improve the overall quality of life in the City of Niles, particularly in our core neighborhoods.

**8. Substantial Amendment Citizen Input**

**Process**

- **Monday February 12 2018:** Request and Approval by City Council for Public Hearing on Monday February 26 2018
- **Friday February 16 2018:** Public Notice in Niles Daily Star regarding Public Hearing and summarizing changes to the PY17 Annual Action Plan.
- **Monday February 26 2018:** Public Hearing will be held prior to the regular City Council Meeting at 5:55pm EST.
- **Monday February 26 2018 - Tuesday March 6, 2018:** Public Comment Period
- **Monday March 12 2018:** City Council consideration of approval during the regular City Council Meeting

**Summary of Comments Received:** TBD

**Summary of comments or views not accepted and the reasons for not accepting them:** TBD

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

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	NILES	
CDBG Administrator	NILES	Community Development Department
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

**Narrative (optional)**

**Consolidated Plan Public Contact Information**

City of Niles, Michigan  
 Community Development  
 333 N 2nd Street  
 Niles, MI 49120  
 communitydevelopment@nilesmi.org  
 269-683-4700 Ext 3020

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

As the lead agency, the City of Niles, Community Development Department oversaw the consultation required to complete the Annual Action Plan. As part of the recent Consolidated Planning Process, Community Development staff collaborated with a wide network of community service and housing providers, clients of those providers, government officials, business leaders, neighborhood representatives and residents. Information was gathered in a number of ways which included a Community Needs Survey, stakeholder and neighborhood forums, outreach at established community events and provider meetings. The outcomes of the Consolidated Plan and associated Annual Action Plans represent the information collected from this collaboration, as well as from public comment and public hearing opportunities.

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

Through regular meetings with individuals, groups, committees and consortia, the City has been working to ensure that local, County, State and Federal programs are routinely considered to meet the needs of our shared community. To maximize these efforts when groups without the capacity to seek/administer funding, make effective referrals or in-roads needed to develop and compliment effective partnerships has been welcome to seek out and receive support and guidance from the City

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

Over the last few years, the City has ramped up its coordination and participation with the Berrien County Homeless Resource Network, the local chapter of the Michigan BOS COC and the VA. Through participation in regular meetings, annual PIT counts, training, and 1:1 conversations and constituent support requests, the City has learned that locally, few individuals and fewer families meet the federal definitions of homeless, but rather are at risk of becoming homeless. While the actual counts are low, the City is working with the PHA to prioritize homelessness and other at-risk categories as allowed. Additionally, we continually work to ensure that anyone presenting in the community as "homeless" receives a referral to the HARA and other homeless service agencies.

#### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate**

**outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City of Niles is only eligible for CDBG funds as an entitlement community. All ESG, HOME, HOPWA, HMIS and COC funds are administered through the State and local recommendations are considered by the State during allocation award season. The City has a vote during local allocations and utilizes that opportunity to provide input into the funding decisions. Additionally, the City employs staff with an advanced understanding of these programs.

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

See tables below

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

1	<b>Agency/Group/Organization</b>	EMERGENCY SHELTER SERVICES INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Emergency Shelter Services provides regular input on local strategic needs. The City needs to continue to work with ESS to provide support for persons and families precariously housed in Niles.



2	<b>Agency/Group/Organization</b>	Homeless Resource Network
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Publicly Funded Institution/System of Care Regional organization Planning organization Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy Market Analysis Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City reaches out to the HRN to discuss local needs and priorities. Input was sought on whether Niles has a homeless issue and how to thereby support local efforts to abate homeless needs. The HRN is limited in funding but includes Niles in it's outreach methods through the HARA. This consultation provides coverage for gaps in local services.
3	<b>Agency/Group/Organization</b>	Niles Housing Commission
	<b>Agency/Group/Organization Type</b>	Housing PHA Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing Publicly Funded Institution/System of Care Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Niles Housing Commission has the authority to purchase, construct, maintain, operate, improve, extend, or repair housing facilities within the City and to eliminate housing conditions which are detrimental to peace, health, safety, and morals or welfare of the City.
4	<b>Agency/Group/Organization</b>	Niles District Library
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	NDL provides space and resources for service entities to provide their services onsite in Niles. Niles District Library has done an amazing job at reaching underserved in the city of Niles.
5	<b>Agency/Group/Organization</b>	Ferry Street Resource Center, Inc
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ferry Street Resource Center assists area residents in securing resources and to provide educational and life-enrichment programs and activities. Their goal is to bridge existing educational, cultural and societal gaps that exist within the community.

6	<b>Agency/Group/Organization</b>	Niles Community Schools
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Health Services-Education Other government - Local Planning organization Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Niles Community Schools provided key feedback when assessing the educational and social needs of the children of Niles.
7	<b>Agency/Group/Organization</b>	Western Michigan University
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Publicly Funded Institution/System of Care Business and Civic Leaders University Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	WMU is working to provide service learning opportunities in Niles for their staff and students as well as our community. This partnership works to expand on long-term historic preservation projects conducted in Niles by WMU staff.
8	<b>Agency/Group/Organization</b>	Niles-Buchanan YMCA
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Health Agency Publicly Funded Institution/System of Care Regional organization Business and Civic Leaders Major Employer Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	YMCA is a long standing partner of the City of Niles and Niles Community schools. Their work with at risk children and their focus on the bridging the gaps in the areas of health and educational

9	<b>Agency/Group/Organization</b>	Lakeland Healthcare
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Services-Education Health Agency Publicly Funded Institution/System of Care Regional organization Business and Civic Leaders Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lakeland provides the majority of medical services and education in Niles. Their team works diligently to ensure that the needs of the broader community are acknowledged and appropriate services and/or referrals are intact.

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

NA

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	MSHDA	The City works with the County and MSHDA to ensure a robust service system is available throughout the City by working to compliment those opportunities with CDBG funded programs.Consolidated Plan NILES 16OMB Control No: 2506-0117 (exp. 07/31/2015)The State and County periodically have funding that compliments what the Consolidated Plan is working to address. As such, over the years, there have been several coordinated projects to eliminate blight, conduct /consider housing markets, economic development opportunities and others.
Berrien County Public Transit Plan	Southwest Michigan Planning Commission	This planning process will aid in the City's review and consideration of funding local transit programs using CDBG funds.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

**AP-12 Participation – 91.105, 91.200(c)**

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

Residents, agencies, businesses and stakeholders have raised concerns that there are a number of alarming trends facing area residents that should receive immediate attention including: a lack of recent local economic growth, failing sewer systems, decaying housing stock, lack of transportation, widespread code violations, increased numbers of street people without local resources, abandoned homes, a lack of locally based social support and/or welfare programs, high unemployment rates coupled with high transportation costs. Based on these issues it was determined that the City needed to carefully consider fund usage and therefore submits a request for a one year extension on the submission of its consolidated plan with this Annual Action Plan.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	Newspaper Ad in Niles Daily Star June 27, 2017	no public comment	n/a	

**Table 4 – Citizen Participation Outreach**



## Expected Resources

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

#### Introduction

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$249,333	0	\$190,432.60 <sup>1</sup>	\$439,765.60 <sup>2</sup>	0	

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied:** No additional resources are available to support the City's CDBG programs.

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

#### Discussion

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<sup>1</sup> Changed from \$30,000 to \$194,014.76 during Substantial Amendment Process

<sup>2</sup> Update during Substantial Amendment Process

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Arrest or Limit Neighborhood Decay	2016	2020	Non-Housing Community Development	Downtown Niles - DDA District City of Niles Low and Moderate Income Area	Blight Elimination and Code Enforcement Programs	CDBG: \$175,000 <sup>3</sup>	Buildings Demolished: 3 Buildings Housing Code Enforcement/Foreclosed Property Care: 3000 Household Housing Unit
2	Support Public Services for Youth and ELI Persons	2016	2020	Public Housing Non-Homeless Special Needs Non-Housing Community Development	City of Niles Low and Moderate Income Area	Community Safety- Crime and Fire Prevention Public Services- ELI Public Services- Education Public Services- Public Health Public Services- Youth	CDBG: \$40,000	Public service activities other than Low/Moderate Income Housing Benefit: 800 Persons Assisted
3	Support Public Facilities- Installation or Rehab	2016	2020	Public Housing Non-Housing Community Development	City of Niles Low and Moderate Income Area	Public Facility Installation and Improvement	CDBG: \$75,000 <sup>4</sup>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted

<sup>3</sup> Updated from \$90,000 to \$175,000 during Substantial Amendment Process

<sup>4</sup> Updated from \$50,000 to \$75,000 during Substantial Amendment Process

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Historic Preservation	2016	2018	Non-Housing Community Development	Downtown Niles - DDA District City of Niles Low and Moderate Income Area	Blight Elimination and Code Enforcement Programs Public Facility Installation and Improvement	CDBG: \$116,000 <sup>5</sup>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
5	Support Fair Housing Practices	2016	2020	Affordable Housing Public Housing Non-Homeless Special Needs	City of Niles Low and Moderate Income Area	Fair Housing Programs	CDBG: \$2,500	Other: 2 Other

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<sup>5</sup> Updated from \$50,000 to \$116,000 during Substantial Amendment Process

**Table 6 – Goals Summary**

**Goal Descriptions**

<b>1</b>	<b>Goal Name</b>	Arrest or Limit Neighborhood Decay
	<b>Goal Description</b>	<p>During the PY16 CDBG Program Year, the City will focus on the following projects meant to arrest or limit neighborhood decay:</p> <ol style="list-style-type: none"> <li>1. Code Enforcement</li> <li>2. Blight Elimination Program</li> <li>3. Smoke &amp; Carbon Monoxide<sup>6</sup> Detector Program</li> <li>4. Chapin Mansion Porch Restoration and Blight Elimination Project</li> <li>5. Program Administration</li> </ol>
<b>2</b>	<b>Goal Name</b>	Support Public Services for Youth and ELI Persons
	<b>Goal Description</b>	<p>In PY17, the City will provide funding for youth services and services to extremely low income persons through the provision of:</p> <ol style="list-style-type: none"> <li>1. NB-YMCA Summer My Way</li> <li>2. Crime Prevention- Niles Community Schools</li> </ol> <p>The key for a successful response is to strengthen capacity of services in high demand and to ensure access by all residents to those services. In the face of increasing local poverty and diminishing resources, local schools and service agencies are struggling to build the staffing and service capacities necessary to meet growing demands. The number of families in poverty living in the community has outpaced surrounding communities. Youth are especially vulnerable and certain measures are being taken locally to counter diminishing resources for our youth.</p> <p>In the face of increasing local poverty and diminishing resources, local service agencies are struggling to build the capacity of staff and services to meet growing demands. The number of families in poverty living in the community has outpaced surrounding communities. The key for a successful response is to strengthen capacity of services in high demand and to ensure access by all residents to those services.</p>

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<sup>6</sup> Carbon Monoxide Detector Program added during Substantial Amendment Process

<b>3</b>	<b>Goal Name</b>	Support Public Facilities- Installation or Rehab
	<b>Goal Description</b>	<p>The planning process identified the development, installation or rehabilitation of public facilities among the high priorities. The development and installation of a youth center was among the highest of priorities. Projects identified include:</p> <ol style="list-style-type: none"> <li>1. Chapin Mansion Porch- decayed and rotting, this blighted and dangerous entrance to the Chapin Mansion, a historically significant structure in Niles' historic structures portfolio, needs to be repaired and made accessible for public use.</li> <li>2. The development and installation of a youth center and/or upgrades to the NB-YMCA</li> <li>3. The installation of a DHHS satellite office in Niles</li> <li>4. The Carnegie Library (Chamber Building) accessibility, roof and masonry</li> <li>5. The Niles District Library roof</li> <li>6. The Niles Housing Commission parking lot</li> </ol>
<b>4</b>	<b>Goal Name</b>	Historic Preservation
	<b>Goal Description</b>	<p>The porch of the Chapin Mansion, one of three buildings in the City's museum portfolio, is blighted and dangerous. A major attraction for school children, seniors and special needs groups, the Mansion is host to over 1,000 CDBG qualified guests each year, seeking educational and recreational opportunities. Repairs will need to be made to ensure the safety and long-term viability of the Chapin Mansion.</p> <p>Historic Preservation (570.202(d)) Historic preservation, including the rehabilitation, preservation or restoration of historic property.</p> <p>Public Facilities and Improvements (570.201(c)) Acquisition, construction, reconstruction, rehabilitation or installation of eligible public facilities and improvements, as in historic districts or neighborhoods; including design features and improvements which promote energy efficiency; and execution of architectural design features to enhance or preserve the aesthetic quality of facilities and improvements receiving CDBG assistance</p> <p>Removal of Architectural Barriers (570.201(k)) Special projects directed to the removal of material and architectural barriers which restrict the mobility and accessibility of elderly or handicapped persons to publicly owned or privately owned buildings, facilities, and improvements, including those which are historic.</p>

5	<b>Goal Name</b>  <b>Goal Description</b>	Support Fair Housing Practices  The City of Niles will begin monitoring and reporting on Fair Housing complaints reported to Community Development staff through the development and use of a database. Efforts will be monitored for ongoing, repeated or trending issues and reported to HUD and/or other responsible entities. Fair housing has long been an important issue for HUD supported programs throughout the US. Since the passing of the Fair Housing Act in 1968 community groups, private business, concerned citizens, and government agencies at all levels have worked earnestly at battling housing discrimination. The Fair Housing Act mandates that the Department of Housing and Urban Development (HUD) affirmatively further fair housing through its programs. Towards this end HUD requires funding recipients to undertake fair housing planning (FHP) in order to proactively take steps that will lead to less discriminatory housing markets and better living conditions for minority groups and vulnerable populations.
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## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

Like many communities, Niles continues to be affected by economic stagnation and decreasing revenues. The City of Niles intends to use its CDBG allocation for blight elimination and code enforcement activities, public facility repair, public services and administration of the CDBG program.

The preferred outcome for this submission of the City of Niles, Michigan's Annual Action Plan focuses on creating a safe, decent and suitable living environment for the citizens of Niles – particularly for low and moderate-income persons living within a designated Low-Moderate Income Area (LMA) within the City.

As detailed herein, the purpose of this Plan is to establish and define projects and programs to be supported by Community Development Block Grant funds.

#### Projects

#	Project Name	Original Funding Requested	Funding Requested during Substantial Amendment Process <sup>7</sup>
1	PY17 Code Enforcement	\$75,000	\$75,000
2	PY17 Blight Elimination	\$63,333	\$100,000
3	PY17 Crime Prevention	\$17,399.95	\$17,399.00
4	PY17 Project Administration	\$49,866.60	\$49,866.60
5	PY17 SMW	\$20,000	\$17,500
6	PY17 Public Facility Rehabilitation	-	\$75,000
7	PY17 Chapin Mansion Porch Project	\$50,000	\$116,000
8	Homeless and Transportation	-	\$5,000

**Table 7 - Project Information**

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

As a part of the consolidated planning process we conducted several community needs based surveys. We asked the communities what their priorities are and how they think the city should use the CDBG funds. The need for social services is a top priority for the community. The Department of Health and Human Services no longer has a physical presence in Niles and the only DHHS office is over 30 miles away and local public transportation doesn't travel more than 5 miles outside of the city. Access to County Offices and other ancillary services are also impaired due to distance for the LMI and ELI persons.

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<sup>7</sup> Updated during Substantial Amendment Process

# AP-38 Project Summary

## Project Summary Information

<b>1</b>	<b>Project Name</b>	PY17 Code Enforcement
	<b>Target Area</b>	Downtown Niles - DDA District City of Niles Low and Moderate Income Area
	<b>Goals Supported</b>	Arrest or Limit Neighborhood Decay Historic Preservation
	<b>Needs Addressed</b>	Blight Elimination and Code Enforcement Programs Community Safety- Crime and Fire Prevention
	<b>Funding</b>	CDBG: \$75,000
	<b>Description</b>	The fact that Niles has become a large rental market, with owners who live outside the area, has substantially increased the need for code enforcement in the City neighborhoods. We work with owners and tenants, alike, to provide input on local zoning, building safety and ordinance compliance. Each year the City's code enforcement department issues approximately 1,700 junk and trash notices and 300 exterior-specific housing orders as well as conducts 1,000 rental unit inspections. Through these efforts, our team is able to review safe housing practices with tenants and preempt possible larger, more expensive problems, by informing property owners of issues. Our team also performs commercial property inspections, installs smoke detectors in owner-occupied residences, and orders weed and tall grass abatement to assure our streets are clean and safe for families to enjoy. The period from April to October is the most active for the Code Enforcement Division as warmer temperatures increase outside activity in the City's neighborhoods. It is this time of year that the Division abates hundreds of lawns that have exceeded the 10 inch height. Officers also perform curbside inspections of every structure where frequently, junk and trash violations are much more prevalent. Rental inspections are also still conducted during this time as most landlords prefer this time of year to hold their inspections.
	<b>Target Date</b>	9/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2148 LMI
	<b>Location Description</b>	The activities will occur strictly within the City's Low/Mod Income areas, including the downtown, as defined by the US HUD.
	<b>Planned Activities</b>	<sup>8</sup> Code Enforcement Activities & Installation of Smoke/Carbon Monoxide Detectors

<sup>8</sup> Content added during Substantial Amendment Process



<b>2</b>	<b>Project Name</b>	PY17 Blight Elimination
	<b>Target Area</b>	Downtown Niles - DDA District City of Niles Low and Moderate Income Area
	<b>Goals Supported</b>	Arrest or Limit Neighborhood Decay Historic Preservation
	<b>Needs Addressed</b>	Blight Elimination and Code Enforcement Programs
	<b>Funding</b>	CDBG: \$100,000 <sup>9</sup>
	<b>Description</b>	Demolition or rehabilitation of deteriorated or severely blighted structures in the LMA
	<b>Target Date</b>	9/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3 ELI
	<b>Location Description</b>	
	<b>Planned Activities</b>	Demolish or rehab up to 3 structures.

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<sup>9</sup> Updated during Substantial Amendment Process

<b>3</b>	<b>Project Name</b>	PY17 Crime Prevention
	<b>Target Area</b>	City of Niles Low and Moderate Income Area
	<b>Goals Supported</b>	Support Public Services for Youth and ELI Persons
	<b>Needs Addressed</b>	Community Safety- Crime and Fire Prevention Public Services- Youth Public Services- Education
	<b>Funding</b>	CDBG: \$17,399 <sup>10</sup>
	<b>Description</b>	Based on conversations with locally invested partners, the City Council and others, the City is proposing to provide supplemental crime prevention services by allocating funding under Public Services to support crime prevention activities undertaken by the Niles Police Department in cooperation with Niles Community Schools. The CDBG funding will be specifically used to provide crime prevention services to the NCS during afterschool and/or extracurricular activities sponsored by NCS. Currently, NCS provides funding for a school resource officer who works in the schools during the regular school season; however, no funding is available to extend the resource officer's services during afterschool and/or extracurricular activities. It is expected that extending these services would cut down on criminal behaviors commonly seen at school events and functions, including underage drinking and verbal and physical conflicts among other issues.
	<b>Target Date</b>	9/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	900
	<b>Location Description</b>	Niles High School Students that are 100 free and reduced lunch.
	<b>Planned Activities</b>	Office Lick <sup>11</sup> of the City of Niles Police department provides security during and afterschool programing.

<sup>10</sup> Updated during Substantial Amendment Process

<sup>11</sup> Updated during Substantial Amendment Process

<b>4</b>	<b>Project Name</b>	PY17 Project Administration
	<b>Target Area</b>	Downtown Niles - DDA District City of Niles Low and Moderate Income Area
	<b>Goals Supported</b>	Arrest or Limit Neighborhood Decay Support Public Services for Youth and ELI Persons Historic Preservation Support Fair Housing Practices Support Public Facilities- Installation or Rehab
	<b>Needs Addressed</b>	Blight Elimination and Code Enforcement Programs Public Improvements- Public Works Public Facility Installation and Improvement Community Safety- Crime and Fire Prevention Public Services- Youth Public Services- Education Public Services- ELI Public Services- Public Health Home Improvement Program Public Services- Economic Development Public Improvements- Utilities and Water Systems Fair Housing Programs
	<b>Funding</b>	CDBG: \$49,866.60 <sup>12</sup>
	<b>Description</b>	This project funds CDBG program administration activities. The City utilizes CDBG funds to adequately manage program operations, including public noticing and project monitoring, funding requests and reviews, data entry, project closeout reports and procedures, technical assistance to applicants and to subrecipients, and Citizen input facilitation, as well as the preparation and oversight of all CDBG program reporting to the Niles City Council, to the citizens of Niles, and to HUD.
	<b>Target Date</b>	9/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2148
	<b>Location Description</b>	
	<b>Planned Activities</b>	Project Administration, Monitoring, Fair Housing, Reporting, Accounting, Technical Assistance, and procurement.

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<sup>12</sup> Updated during Substantial Amendment Process

<b>5</b>	<b>Project Name</b>	PY17 SMW
	<b>Target Area</b>	City of Niles Low and Moderate Income Area
	<b>Goals Supported</b>	Support Public Services for Youth and ELI Persons
	<b>Needs Addressed</b>	Public Services- Youth Public Services- Education Public Services- ELI Public Services- Public Health
	<b>Funding</b>	CDBG: \$17,500 <sup>13</sup>
	<b>Description</b>	Local community development plans indicate that afterschool and summer programs are among the most critical of needs. Local and national research would agree that students experience a myriad of issues while school is not in session which may be avoidable with the successful implementation of quality, out-of-school time programs. These include increased crime, lack of social stimulation, and a dramatic loss of academic knowledge, better known as Summer Slide associated with extended breaks between academic instructional periods. Over the last three years, community partners concerned with these issues have developed a collaborative which has sought to counter many of these concerns by implementing educationally based, afterschool and summer programming. Local summer and out-of-school time programs have been successfully providing area youth structured academic instruction and social, nutritional, and physical education programming opportunities to over 750 area youth for the last three years.
	<b>Target Date</b>	9/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	200
	<b>Location Description</b>	
	<b>Planned Activities</b>	Support 200 youth from Niles Community School students that are on 100% free and reduced lunch qualified with activities such as...Sporting, Exercise, Fitness, Academic, Recreation and Leisure.

<sup>13</sup> Updated during Substantial Amendment Process

<b>6</b>	<b>Project Name</b>	PY17 Historic Preservation
	<b>Target Area</b>	City of Niles Low and Moderate Income Area
	<b>Goals Supported</b>	Arrest or Limit Neighborhood Decay Historic Preservation Support Public Facilities- Installation or Rehab
	<b>Needs Addressed</b>	Blight Elimination and Code Enforcement Programs Public Facility Installation and Improvement
	<b>Funding</b>	CDBG: \$116,000 <sup>14</sup>
	<b>Description</b>	The City of Niles will allocate monies to the repair and rehabilitation of the Chapin Mansion, a public facility that offers cultural educational services and community outreach.
	<b>Target Date</b>	9/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2148
	<b>Location Description</b>	508 E. Main Niles, MI 49120 The Chapin Mansion
	<b>Planned Activities</b>	Repair blighted front porch and make the building ADA accessible.

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<sup>14</sup> Updated from \$50,000 to \$116,000 during Substantial Amendment Process  
Annual Action Plan  
2017

## **AP-50 Geographic Distribution – 91.220(f)**

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

The City of Niles has two target areas- the downtown and the LMI area. These two sections of the City account for roughly 1/5th of the City's 5.5 sq miles or about 1 sq mile. The City of Niles uses the majority of its Community Development Block Grant funds to assist low and moderate income (LMI) residents, either through direct or indirect assistance. Indirect assistance occurs when the City deploys its CDBG funds in its designated Low and Moderate Income Area (LMA). To document low and moderate income areas the City has used two sources, the 2010 American Community Survey conducted by the U.S. Census Bureau and Community Planning and Development Map Tool provided by HUD.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Downtown Niles - DDA District	
City of Niles Low and Moderate Income Area	

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The City's core is at risk due to the breadth of poverty, aging infrastructure and deferred property maintenance. The City and individual homeowners are limited by available funding and landlords are absent and disconnected. The expectation for CDBG fund use is revitalization through targeted blight elimination, code enforcement and infrastructure upgrades/repairs, as well as public services and facilities.

### **Discussion**

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

The mission of the City of Niles' Community Development Block Grant program is to address the needs of low and moderate income residents by pursuing the development of decent and affordable housing, a suitable living environment, and where applicable, expanded economic opportunities. The City's affordable housing goal also includes the number of households to be provided affordable housing through the rehabilitation of existing owner-occupied units. Housing affordability in Niles is not perceived to be a problem. Generally, those seeking homeownership opportunities find affordable units. Ongoing conversations among landlords, renters, and affordable housing providers would indicate that available rental housing is affordable but that landlords are frequently unable to meet costly maintenance issues that would allow them to let code compliant properties.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

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

**Table 10 - One Year Goals for Affordable Housing by Support Type**

### Discussion

While the City has eliminated all direct support programs, we expect to provide improvements and services that will affect the greater population.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Niles Housing Commission (NHC) is a component unit of the City's hierarchy.

Founded as part of the City in the 1970s the NHC has had a varied and troubled past but has always been the only available "last chance" housing in Niles.

With over 200 households calling the NHC home each year, the survival and growth of the NHC is tantamount to local affordable housing.

Over the last two years, the City has worked hand in hand with the NHC to ensure local compliance with federal PHA mandates.

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

1. Continued technical assistance to PHA
2. Supportive Planning
3. Review of all Fair Housing Complaints

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

The Niles Housing Commission has been working with a management firm for 2 years. During this time, the quality of life for residents has increased dramatically.

Residents now have a voice through the RAB and Resident Council.

Social Service, Healthcare and Financial Literacy Programs are offered weekly through community partners.

There is onsite access to the MDHHS portal as well as the SSA's portal for benefit support.

The management firm has been tasked with determining when the NHC could request social service support funding like Ross and other like structures.

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

### **Discussion**

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single family houses to high rise apartments for elderly families. In the United States, there are approximately 1.2 million households living in public housing units, managed by about 3,300 housing authorities (HA).

The Niles Housing Commission is one these housing authorities, having been created by agreement between the City of Niles and HUD in 1972. Today, the Niles Housing Commission manages a total of 180 units – 50 single family homes scattered throughout the City and 130 apartment units located within a



six story high rise in downtown Niles.

Until recently, the Niles Housing Commission has been designated as “troubled” by HUD. Over the last three years, the City Administrator, Finance Director/City Treasurer and Community Development Director have been working with the board to meet the requirements set by HUD. Following a long period of political upheaval and managerial changes, The Niles Housing Commission now has a current strategic plan for addressing the needs of low and moderate income families and improving their living environment, as well as improving the management and operation of public housing.

The City has been working closely with the NHC to rectify administrative issues and develop operational plans, policies and standard operating procedures. The City feels strongly that the success of the NHC is important to the community and has designated affordable housing planning as an approved project during this Action year.

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

### **Introduction**

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City is working with the Berrien County Homeless Resource Network (the locally identified COC) to determine if funding is available to support 1-2 households in obtaining shelter and/or permanent housing within the City of Niles. Additionally, the City works with the Niles Community Schools’ provides support to area youth designated as homeless under US Department of Education regulations.

**Addressing the emergency shelter and transitional housing needs of homeless persons**

All individuals and/or households who are identified as lacking a fixed place to live tonight are referred to a shelter in Benton Harbor, MI and/or South Bend, IN. Both communities are equal distances away and are accessible by public transit bus, however, the bus fare and the time it takes to get to either community on public transit are significant barriers when the crisis is happening right now at these times, the Niles Police Department or other social service entity are willing to transport. Alternatively, with notice, the Community Development Department can arrange and provide transportation to one of the shelters using public transit fairly effectively.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals**

**and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City relies heavily on the COC (HRN in Berrien County) and HARA for ensuring successes for homeless persons.

There are no shelters, programs, or services available in Niles.

That said, we are working to bolster offerings by seeking projects that will be able to provide emergency support.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

While there are very few local people living on the streets (Niles Police Department indicates 1-5 people at any given time lack any residence within the City limits), there is a small number of local people in desperate need of permanent accommodations.

At these times, the City works 1:1 with individuals/households to find a permanent solution. This often includes referrals for services, education, housing, clothing, food, training, and/or other publically available resources.

**Discussion**

The City is taking a more active role in how we accommodate and support low-income households at risk of becoming homeless. While homelessness is not an apparent problem in Niles, the breadth of poverty often finds households on the brink of losing their housing and in need of support. Further discussion in the coming months with the HRN will help identify what can be done to abate or at least slow the progress of poverty in Niles.

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

### **Introduction:**

Housing affordability in Niles is not perceived to be a problem. Generally, those seeking homeownership opportunities find affordable units. Ongoing conversations among landlords, renters, and affordable housing providers would indicate that available rental housing is affordable but that landlords are frequently unable to meet costly maintenance issues that would allow them to let code compliant properties.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City is undergoing Master Planning. Close review of land use controls, zoning and building codes, fee structures and policies is eminent.

While we do not believe that there will be many public barriers, understanding what we, as a municipality, can do to support the ebb the growth of poverty will be huge.

### **Discussion:**

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

#### **Actions planned to address obstacles to meeting underserved needs**

##### Actions include:

Aid all agencies that provide ancillary services to the community.

Provide funding for youth services through Summer My Way and school crime prevention programs.

#### **Actions planned to foster and maintain affordable housing**

##### Actions include:

Identify, correct and slow blight through targeted code enforcement, demolition of three structures identified as condemned.

Provide technical assistance to public/subsidized housing providers.

Encourage development of LIHTC and other publically funded housing projects

#### **Actions planned to reduce lead-based paint hazards**

##### Actions include:

Project Environmental Review compliance

Contractually mandated remediation, abatement or safety planning for contracts including lbp hazards.

#### **Actions planned to reduce the number of poverty-level families**

##### Actions include:

Aid all agencies that provide ancillary services to the community.

#### **Actions planned to develop institutional structure**

##### Actions include:

Technical Assistance to Niles Community Schools

Technical Assistance to Niles Housing Commission

On-going use of of Fair Housing Concern Database

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

##### Actions include:

Coordiantion with HRN (Berrien County COC) and HARA

Coordination with LCAN (local college access network)

Coordination with Summer My Way collaborative  
 Coordination with Niles Housing Commission  
 Coordination with Be Healthy Berrien and the United Way  
 Coordination with the Niles District Library.

**Discussion:**

**Program Specific Requirements**

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

**Introduction:**

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

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

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

**Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	74.35% <sup>15</sup>

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<sup>15</sup> Updated from 70% to 74.35% during substantial amendment process  
 Annual Action Plan  
 2017