



COMMUNITY DEVELOPMENT
BLOCK GRANT
DRAFT 2024-2025 ANNUAL
ACTION PLAN

Development Services Department

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Executive Summary

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

1. Introduction

Waterford Township is a U. S. Department of Housing and Urban Development (HUD) entitlement community. As such, the Township has been the recipient of Community Development Block Grant (CDBG) funds since 1974. Beginning in 1995, HUD required entitlement communities, such as Waterford Township, to develop a Consolidated Plan (Con Plan) to receive federal funding for the purpose of meeting housing, community development and economic development needs.

Waterford Township's community development block grant (CDBG) objective is to address the housing and community development needs of low- and moderate-income (LMI) residents by taking advantage of opportunities to ensure decent and affordable housing, suitable living environment and where, applicable, and expand economic development. This document will address the CDBG-funded activities, and how they achieve these objectives, for the Township's CDBG program for PY 2024-2025.

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.

Community Development Block Grant (CDBG) funds will be used to address needs over the five years outlined in the Strategic Plan. HUD's objectives guiding the proposed activities are:

- Provide decent affordable housing
- Create suitable living environments
- Create economic opportunities

Based on analysis conducted as part of its Con Plan process and information collected through citizen participation and consultation, the objectives of Waterford Township's Con Plan were determined to be the following:

Housing - The improvement and preservation of existing neighborhoods along with housing for all residents particularly affordable housing for low income (LI) owners and renters, is a priority. Development and preservation of affordable rental and owner housing. This includes a focus of rehabilitation/weatherization of the housing stock.

Blight removal - Public engagement noted the need to eliminate blight in LI areas and related corridors to foster economic development activities.

Economic Development increased economic opportunities for low-income individuals – funding will be targeted towards projects that create permanent jobs and job training.

Public Facilities and Infrastructure - The Con Plan will focus on improving current existing service levels and creating new public facilities and improvements that primarily serve LI persons or improvements that are located in an eligible LI area.

Further Fair Housing - HUD funding recipients have been obligated by law to reduce barriers to fair housing. Reducing housing discrimination, promoting diverse inclusive communities and affirmatively furthering fair housing (AFFH) and equal opportunity remain an ongoing priority.

Public Services - Even though there have been limited or no funds available to support public services under the previous Con Plan, feedback indicated a need for greater access to essential human services such as transportation and emergency assistance within the community. Waterford Township recognizes that a compelling need exists despite overextended municipal budgets and pressure on existing local private resources and will seek to partner with local service providers, if and when, financial resources become available under this Con Plan. Provide critical support services – funding will be prioritized for programs serving children and special needs populations.

Administration and Planning - Waterford Township developed the following seven Con Plan goals to achieve these objectives:

Housing Rehabilitation - Provide assistance to LMI residents in the form of Deferred Payment Loans (DPL) to income eligible Township residents of owner-occupied, single-family residential households in an effort to bring sub-standard housing up to current federal housing quality standards and meet local housing codes.

Code Enforcement - Support efforts to enforce code compliance to ensure decent, safe and sanitary living conditions, as well as blight ordinance enforcement in the CDBG target areas.

Public facilities and infrastructure improvements - Create suitable living environments through public facilities and infrastructure improvements.

Clearance and Removal of Unsafe Structures - Provide funding to support the demolition of blighted and condemned properties and structures which pose health and safety hazards in CDBG eligible areas.

Fair Housing - Administrative funding to affirmatively further fair housing in the Township.

Administration - Staff and related costs required for overall program management, planning, coordination, monitoring, reporting and evaluation.

3. Evaluation of past performance

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

The Waterford Township Development Services Department is responsible for ensuring that the performance of CDBG program funding meets the national objectives established by Congress and the programmatic requirements established by HUD. In summary, each activity that is funded through the Township's CDBG Program is monitored annually to make sure that the outcome established in the Con Plan to meet a specific need is met. If not, then that activity will be evaluated to determine if the need for that activity is still a priority, or if that need is being met elsewhere, or if the community dynamics have changed and the demand for a specific need has decreased. Every year, there are public input sessions to gather input on funded activities and to evaluate if they should still be funded to meet a Con Plan goal going forward. A description of the goals and the public input process are provided in the annual action plan, which is submitted to HUD for review and approval. Further, Waterford Township maintains a continual performance monitoring system through the annual single audit at the end of each calendar year and the CAPER at the end of each CDBG program year which includes HUD's performance measurement reviews.

As in previous years, priority for PY 2023 was placed on initiatives that would benefit low-and moderate income persons, help improve the Township's housing stock, and eliminate blight within its lower income neighborhoods. So, a majority of the Township's HUD funding was directed towards Housing Rehabilitation and Code Enforcement activities. This practice has proven that many of the unexpected expenses that otherwise would burden its low to moderate income homeowners can be resolved or lessened. Further, when coupled with the benefits achieved through Code Enforcement efforts within those areas designated as CDBG Target Areas these two have helped to promote health and safety, improve property values, and prevent further deterioration. Specifically, at the time of preparing this plan Waterford Township was in the processs of providing rehabilitation assistance to over 11 low income homeowners throughout the community and perform over 300 inspections within areas designated as CDBG Target Areas.

That said, Waterford Township acknowledges that despite any success under the previous plans, the limited amount of federal resources cannot address all the community's needs. Therefore, the Township will continue to prioritize activities that provide decent housing, promote suitable living environments, and that help remove blight and look to leverage resources to address the growing demand for public services and improve infrastructure.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Summary from citizen participation section of plan.

Public participation is an important part of the development process of the annual action plan. During the preparation of the PY 2024 annual action plan, staff consults with organizations, agencies, and residents. Consultation with these groups helps identify priority needs as they have insight on what is happening in their neighborhoods. The Township also undergoes outreach efforts to gain knowledge from residents by posting notices, meetings, availability of documents, etc. Historically, a low percentage of residents provide input.

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.

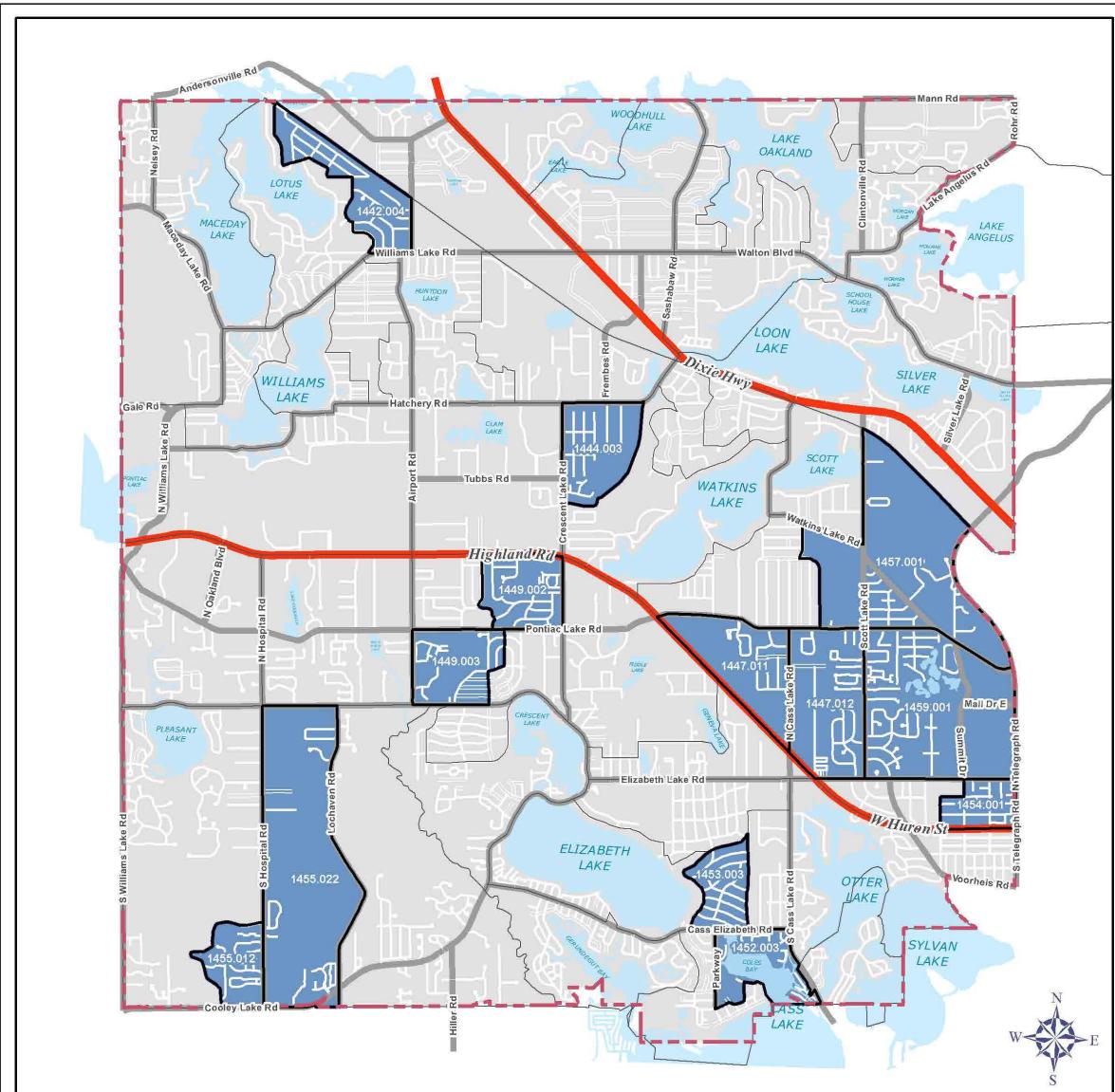
There were no public comments received.

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

There were no public comments received.

7. Summary

The annual action plan reflects the coordinated efforts of residents, volunteers, staff, elected officials, local public service agencies and private developers. This plan will help determine how federal funding will be expended to address Waterford Township's community and housing priorities/needs under HUD's CDBG program.



2023 CDBG Eligible Target Areas



Eligible Block Group Areas



Municipal Boundary



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2023 CDBG Eligible Block Groups

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	WATERFORD TOWNSHIP	
CDBG Administrator	WATERFORD TOWNSHIP	Development Services Department
HOME Administrator		

Table 1 – Responsible Agencies

Narrative

Waterford Township receives an annual allocation of Community Development Block Grant (CDBG) funding. The funds will total approximately \$400,000 a year, for a total of \$2 million over the five year period covered by this consolidated plan. Waterford's Development Services Department serves as the lead agency in coordinating the preparation of the Five Year Consolidated Plan, each Annual Action Plan, and the program year-end Consolidated Annual Performance and Evaluation Report. Further, the Development Services Department is responsible for administering all facets of the Township's CDBG funds.

Consolidated Plan Public Contact Information

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Annual Action Plan
2024

6

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

1. Introduction

Waterford Township receives an annual allocation of Community Development Block Grant (CDBG) funding. The estimated funds are approximately \$370,000 a year. Waterford's Development Services Department serves as the lead agency in coordinating the preparation of the Five-Year Consolidated Plan, each Annual Action Plan, and the program year-end Consolidated Annual Performance and Evaluation Report. Further, the Development Services Department is responsible for administering all facets of the Township's CDBG funds.

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

Staff will continue to communicate with local CofC, HMIS administrator, housing and supportive services providers to become better informed of their efforts and the needs of their clients. Further, the Township will continue to participate in various meetings or events hosted by organizations like the Alliance for Housing, Oakland County's CoC, to help end homelessness and increase affordable housing opportunities.

Waterford Township is often asked to share information and support public and assisted housing provider projects, but due to limited resources, it is not possible to address specific public housing needs with the limited CDBG funds received. A strong and collaborative working relationship with these public and assisted housing providers, private and governmental health, mental health and service agencies proposing projects will be a priority manifested in the Township signing Certifications of Consistency with the Consolidated Plan so that these service organizations can obtain funding to address these needs and their efforts ultimately reach Waterford's population.

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.

In Waterford Township, there are no facilities for the homeless or persons threatened with homelessness. However, Waterford recognizes homelessness as a social issue that is not easily contained within municipal boundaries. Waterford has concluded that the primary means to combat homelessness is to support Oakland County's efforts to fight the problems. Responsibility for coordinating the overall Continuum of Care (CoC) and organizing the County's response to HUD's annual

CoC application resides with the Alliance for Housing of Oakland County, formerly the Oakland County Taskforce on Homelessness and Affordable Housing.

The Alliance is a 501(c)(3), non-profit organization that works to end homelessness and increase affordable housing opportunities. The Alliance is comprised of a number of organizations including emergency shelters, warming centers, providers of health services including mental health services, providers of services to people with developmental disabilities, for-profit and nonprofit developers of affordable housing, administrators of supportive housing programs, municipalities, governmental agencies and faith-based service providers. Information on Alliance general membership meetings can be obtained at <https://www.oaklandhomeless.org/general-membership-meeting>. The Alliance Board of Directors meeting information can be obtained at <https://www.oaklandhomeless.org/alliance-board-meeting>.

Information regarding upcoming events and/or services provided through other agencies that participate in the CoC are posted at Town Hall when made available. The Township maintains a strong and close collaborative working relationship with the Alliance for Housing of Oakland County. The Township has consistently assisted, and will continue to do so throughout the next five years, in signing Certifications of Consistency with the Consolidated Plan for those organizations working throughout the County to address housing for special needs populations.

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

Waterford Township does not receive ESG funds.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Fair Housing Center of Metro Detroit
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization had previously handled Fair Housing concerns in the Township. Staff now attends training with the organization.

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 - Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

Citizens have always been encouraged to participate with local governance through public comments at meetings, public hearings, or through discussions with the Elected Officials or staff. While HUD regulates specific instances of obtaining citizen comment for the Consolidated Plan, Annual Plan, Citizen Participation Plan, and year-end report, staff accepts and considers oral or written comments throughout the year and incorporates them into plans and activities when feasible. Waterford Township adopted its current Citizen Participation Plan (CPP) June 2020 and it was integral in goal-setting and developing strategies in the consolidated plan. Further, the CPP describes the public process that the Development Services Department utilizes throughout the year.

While the Township provided the opportunity for public participation during the development of the PY2024 annual action plan, the Township's goals have already been established in the strategic plan portion of the 2022-2027 Con Plan. Any comments generated during the PY2024 annual action plan would not modify these goals.

A public hearing will be held on July 8, 2024 at the Waterford Township Board Meeting for the proposed PY 2024 annual action plan. Any public comment provided will be considered. Notice for the public hearing and the Final Statement was published in the Oakland Press on April 21, 2024.

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)

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

As a CDBG entitlement community, it is anticipated Waterford Township will continue to receive annual formula allocations under each grant for the duration of the Five-Year Consolidated Plan. These expected federal resources will be combined with other federal, state and local funding opportunities that may become available to further the goals and strategies of the Consolidated Plan.

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	354,512	50,000	50,000	454,512	956,500	3 years remain @ 363K per year. 50k in residual prior year funds.

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

The CDBG funds may be utilized in capital projects to leverage local funds, if they become available, to complete important projects within low/moderate income areas for necessary physical improvements. CDBG funds considered to support public services will be leveraged with other funding sources by the organizations receiving them to leverage private contributions. The Township does not have matching requirements for organizations/agencies to provide “matching” of non-CDBG funds.

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

Waterford Township will not utilize publicly owned land to address the needs in the plan. However, Waterford Township regularly considers using tax forfeited properties that Oakland County manages. These lands range from homes that are in need of rehab, to severely damaged/condemned buildings, to open parcels. Often the Township looks to remove the blighted structures and encourage redevelopment. Often said parcels contain regulated wetlands or are otherwise undevelopable tracts of land that the Township looks to combine with adjacent park property increasing the overall area preserved for passive recreation activities.

Discussion

N/A

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Administration/Planning	2021	2025		Waterford Township		CDBG: \$80,000	Other: 1 Other
2	Housing Rehabilitation	2021	2025	Affordable Housing	Waterford Township	Housing	CDBG: \$180,000	Homeowner Housing Rehabilitated: 12 Household Housing Unit
3	Code Enforcement	2021	2025	Affordable Housing	Waterford Township		CDBG: \$180,512	Housing Code Enforcement/Foreclosed Property Care: 400 Household Housing Unit
4	Clearance and Removal of Unsafe Structures	2021	2025	Non-Housing Community Development	Waterford Township	Clearance and Removal of Unsafe Structures	CDBG: \$9,000	Buildings Demolished: 1 Buildings
5	Public Facilities and Infrastructure Improvements	2021	2025	Non-Housing Community Development	Waterford Township		CDBG: \$79,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 10 Households Assisted
6	Public Services	2021	2025	Homeless Non-Homeless Special Needs	Waterford Township	Public Services	CDBG: \$6,000	Public service activities other than Low/Moderate Income Housing Benefit: 10 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Administration/Planning
	Goal Description	Overall program management, planning, coordination, monitoring, reporting and evaluation as well as administrative funding to further fair housing in the Township.
2	Goal Name	Housing Rehabilitation
	Goal Description	Provide assistance to low and moderate income residents in the form of Deferred Payment Loans (D.P.L.) to income eligible Township residents of owner-occupied, single-family residential households in an effort to bring sub-standard housing up to current federal housing quality standards and meet local housing codes
3	Goal Name	Code Enforcement
	Goal Description	Support efforts to enforce code compliance to ensure decent, safe and sanitary living conditions, as well as blight ordinance enforcement.
4	Goal Name	Clearance and Removal of Unsafe Structures
	Goal Description	Clearance and securing of unsafe structures and remediation of blighted conditons
5	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	Create suitable living environments through public facilities and infrastructure improvements.
6	Goal Name	Public Services
	Goal Description	Support human service programs/providers and opportunities for low income and special needs populations.

Annual Action Plan
2024

15

AP-35 Projects - 91.420, 91.220(d)

Introduction

Program Year 2024 remains challenging for Waterford Township the stagnant CDBG allocation received from HUD. HUD allocated \$354,512 in CDBG funds to the Township; coupled with \$80,000 in anticipated program income, resulting in \$434,512 in new funding to support ongoing activities. In addition, Waterford Township will re-allocate \$100,000 of available previous program year funding towards Program Year 2024 activities.

Waterford Township also anticipates leveraging approximately \$1.5 million in Section 108 loans to assist economic development in targeted low / mod business districts.

#	Project Name
1	FY 2024 CD050 Program Administration, Planning, and Fair Housing
2	FY 2024 CD050 Housing Rehabilitation
3	FY 2024 CD050 Code Enforcement
4	FY 2024 CD050 Public Improvement and Infrastructure
5	FY 2024 CD050 Public Services
6	FY 2024 CD050 Economic Development Assistance

Table 7 – Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	FY 2024 CD050 Program Administration, Planning, and Fair Housing
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Providing for administrative, management, and fair housing costs necessary for CDBG program operation. These funds will be implemented directly through the Township. These funds are eligible in accordance with 24CFR570.206.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Entire Township
2	Planned Activities	Administrative oversight and Fair Housing
	Project Name	FY 2024 CD050 Housing Rehabilitation
	Target Area	Waterford Township
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Fair Housing
	Funding	CDBG: \$180,000
	Description	Provide assistance to low and moderate income residents in the form of Deferred Payment Loans (D.P.L.) to income eligible Township residents of owner-occupied, single-family residential households in an effort to bring sub-standard housing up to current federal housing quality standards and meet local housing codes.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	12 families
	Location Description	Eligible families within the township

	Planned Activities	Provide no interest defered loans to low / mod income homeowners to address Urgent Needs Home Repairs
3	Project Name	FY 2024 CD050 Code Enforcement
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	CODE ENFORCEMENT - Township CDBG Target Areas - Payment of a portion of the costs necessary to enforce the Township's codes in the CDBG Target Areas. This project shall be implemented directly through the Township. This project is eligible in accordance with 24CFR570.202(c) and meets the national objective as describe in 24CFR570.208(a)(1) An additional \$50k in previous years unspent funds will be allocated to this project.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
4	Project Name	FY 2024 CD050 Public Improvement and Infrastructure
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing. These funds are eligible in accordance with 24CFR570.201(c) and meets the national objective as describe in 24CFR570.208(a)(1)
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	FY 2024 CD050 Public Services
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Provide public services to support eligible individuals through interim assistance and emergency grants under 24 CFR 570.201(f), 24 CFR 570.202, and 24 CFR 570.207(b)4)
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	FY 2024 CD050 Economic Development Assistance
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Provide Special Economic Development Assistance as permitted under 24 CFR 570.201(o) and 24 CFR 570.203 to support business development, job creation, and training in low / mod areas.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Low / mod commercial areas within Tract 144100, Block Group 4.
	Planned Activities	Economic and technical assistance for small business to promote job training and creation.

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

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

In general, the Township's projects will focus on the Township as a geographic whole. There are no significant areas of minority concentration. Where necessary, the Township will direct assistance to those areas designated as CDBG Target Areas, as shown in the CDBG Target Area Map included in appendix of this document, which are the Township's areas of highest concentration of low- and moderate-income citizens.

Economic Development activities will be focused on Tract 144100, Block Group 4.

Geographic Distribution

Target Area	Percentage of Funds
Waterford Township	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In recognition of the many needs of the Township and its limited resources, the primary mission of the Township's CDBG funds shall be to act as a catalyst for change by providing seed funding for eligible projects that may attract other resources, especially those of the private sector. The basis for allocating investments geographically within Waterford is through approval by the Township Board.

Discussion

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Annual Action Plan
2024

23

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

Introduction

Waterford Township will work to evaluate and address impediments to housing development.

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 Township has begun promoting infill developments in certain areas of the Township. As part of this, the Township has modified the zoning ordinance to remove some limitations and include more areas with a focus on multiple-family development to foster increased unit development.

Discussion

Limited resources require the Township to be reliant on developers to facilitate projects. The Township will continue to work to eliminate unnecessary obstructions where appropriate while protecting the existing developed areas from degrading.

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

Introduction

Waterford Township will continue to seek ways to ameliorate the negative effects of public policies that serve as barriers to affordable housing during the upcoming PY50.

Actions planned to address obstacles to meeting underserved needs

Waterford Township proposes to re-allocate available previous program year funds in an amount not to exceed 15% of the total 2024 PY allocation to help support emergency financial assistance to families in need.

The Township will provide support, to the extent possible, to address emergency situations and provide support to Community Based service agencies and needs arise. The Township and its service partners will continue to strive to meet these needs as best as possible until funding levels are restored to reasonable levels. Until then, the Township will carefully focus its allocation toward investments and improvements to uplift the economic conditions of the community as a whole.

Actions planned to foster and maintain affordable housing

Those public policy barriers that pose a threat to the affordability component to Waterford's Housing Stock are still those barriers that are beyond the control of the municipal government of the Charter Township of Waterford. The Township is still dependent upon the outcome of revisions and improvements in the federal tax system so that tax benefits in which developers previously were able to earn for creating and constructing affordable housing units will once again be offered. Again, this policy, pursued innovatively, while avoiding past pitfalls, will do more for creating affordable housing throughout the nation, including the Charter Township of Waterford, than any changes in local policies. According to the Township Master Plan, with the exception of 1,100 acres, all land zoned for housing units has been developed. Of the remaining 1,100 acres, the majority is located in areas determined to be wetlands. Past development policies have resulted in enabling over 71,000 persons the ability to reside within Waterford Township. Affordability has not been a victim of these development policies; instead, they have encouraged over the past decades one of the strongest affordable housing stocks within the Detroit-Metro area.

That said, Waterford Township will continue to administer a housing rehabilitation program that provides assistance in the form of Deferred Payment Loans (D.P.L.) to income eligible Township residents of owner-occupied, single-family residential households in an effort to bring sub-standard housing up to current federal housing quality standards and meet local housing codes. These efforts assist in the long-term maintenance and livability of a residential property. Further, continued and consistent code enforcement efforts focused within CDBG target areas will help ensure decent, safe

and sanitary living conditions.

Actions planned to reduce lead-based paint hazards

The challenge of addressing LBP throughout the Township remains high as 67% of owner-occupied homes were built prior to 1980 (2007-2011 ACS). With that, Waterford has rarely experienced occurrences of lead-based paint problems due to property maintenance failure. In fact, previous individualized notifications to low- and moderate-income homeowners produced no evidence of lead-based paint hazards resulting from the owner's failure to maintain their property. Waterford Township shall continue to monitor and inspect for lead-based poisonings within its jurisdiction in accordance with the federal government's current regulations.

Specifically, Waterford shall address what lead-based paint problems that might exist through the following actions:

Housing units funded with CDBG funds must meet Federal Lead-Based Paint (LBP) regulations. The Township operates a CDBG funded housing rehabilitation program on single-family, owner-occupied dwellings. The program has specific procedures which outline the steps to educate, test, contain and/or remediate LBP. Rehabilitation projects in which the structure was constructed before 1978 fall under the Federal LBP regulations. A lead hazard information pamphlet is provided to all perspective participants in the housing rehabilitation program. If the structure was built prior to 1978 and the project requested warrants it, a LBP risk assessment is conducted. The finds are incorporated into the specifications for the rehabilitation work. Contractors participating in the housing rehabilitation program doing work involving lead-based paint must present documentation certifying them as a LBP certified contractor. Occupancy plan is developed to ensure occupants will not be exposed during site work. Results of clearance tests are provided to the homeowner.

These actions educate the public of the danger of LBP and provide a LBP free living environment for the occupants upon completion of site work.

Actions planned to reduce the number of poverty-level families

The Township currently possesses no control over any anti-poverty resources save its annual CDBG funds. These funds have been utilized primarily for housing preservation through rehabilitation and for public improvements; all of which have been implemented to assist the Township's low- and moderate-income citizens. These projects undoubtedly do have an indirect anti-poverty effect by ensuring that the low-moderate income housing stock and neighborhood public facilities are kept in such condition as to prevent families and individuals from becoming impoverished attempting to maintain the structural upkeep of their homes and neighborhood facilities with scarce or nonexistent financial resources. Furthermore, the assistance provided to rehabilitate homes and neighborhoods enables families and individuals to escape the dangers of becoming entrapped in the psychological poverty triggered by a surrounding environment that is deteriorating at a pace over which individuals believe they have no

control.

The Township has targeted a specific region to promote focused economic development assistance for job creation and training within the Township. Support will focus on improving economic conditions and opportunities for low income workers.

Actions planned to develop institutional structure

The Charter Township of Waterford will carry out its housing and community development strategy through an institutional structure with its Development Services Department at the center. The Township's Parks and Recreation Department, and Public Works Department will be instrumental in achieving the goals and objectives of this plan as well. Overall, staff will continue to participate in developing institutional relationships through direct contact with other public and private agencies, and participating in community-based boards and commissions to remain cognizant of the area's needs. Specifically, continued coordination between public, private, and faith-based entities will be encouraged to increase institutional structure to provide the greatest benefit to the community and constituents.

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

Waterford Township will actively engage with surrounding communities, other entitlement communities, and Oakland County and coordinate with housing and social service agencies and other entities to enhance collective efforts to achieve the Township's housing and community development goals within the current funding restrictions.

Waterford Township is a member of the Oakland County HOME Consortium. Members of the Consortium met on a regular basis throughout the consolidated planning process to share data and discuss ideas.

Waterford Township will cooperate with social service agencies, other government and local agencies to help provide affordable housing and assistance to persons living in poverty. The Township will work with social service agencies, government and local agencies to further identify the needs of those threatened with poverty and to find resources to meet their needs. Grant application proposals by service organizations for programs that would assist poverty level persons will be supported with Certificate of Consistency with the Consolidated Plan.

Discussion

Intentionally left blank

Program Specific Requirements

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

Introduction

The Annual Action Plan period will begin July 1, 2024. Approximately \$80,000 is anticipated for program income during the 2024 program year.

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	20
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Discussion

Program year 2024 will have a one-year period (7/2024 thru 6/2025) that will be used to determine that a minimum overall benefit of 70% of CDBG funds are used to benefit persons of low and moderate income.

