



CITY OF DETROIT PUBLIC ACTION PLAN FOR COMMUNITY DEVELOPMENT BLOCK GRANT - DISASTER RECOVERY (CDBG-DR)



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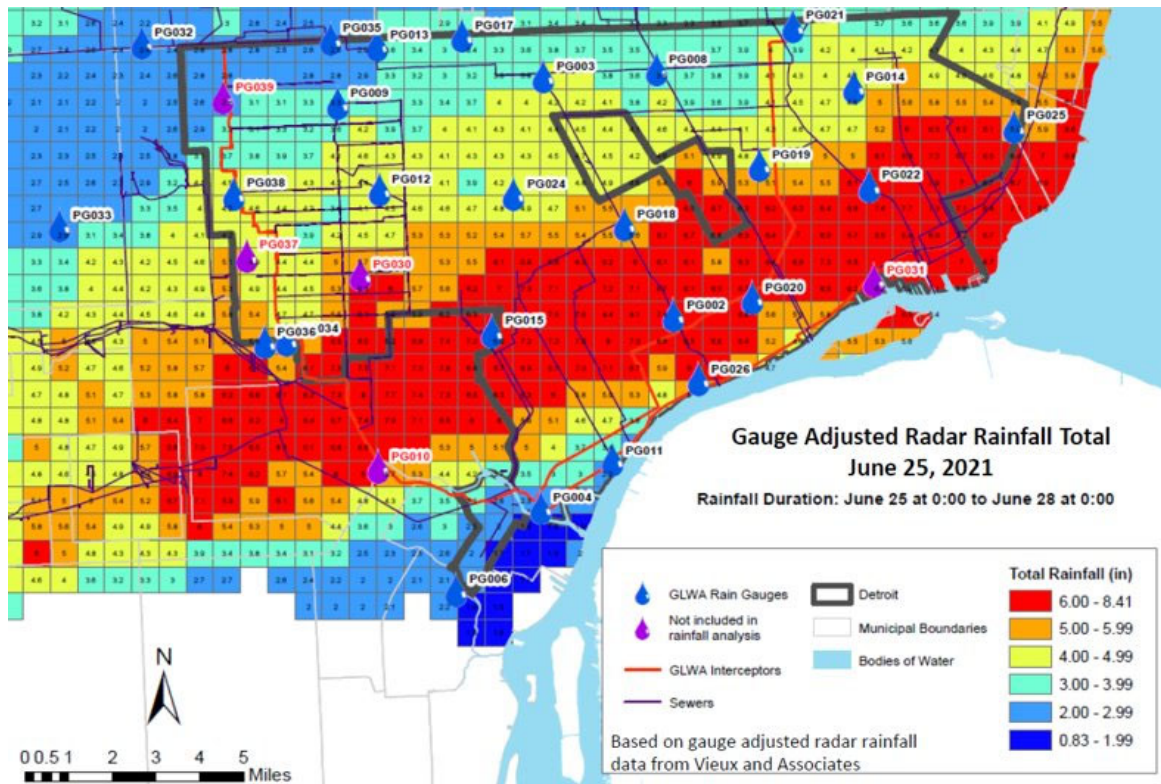
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I. Executive Summary

The U.S. Department of Housing and Urban Development (HUD) announced in March 2022 that the City of Detroit was awarded \$57,591,000 in Community Development Block Grant – Disaster Recovery (CDBG-DR) funding to support long-term recovery efforts following storm events from the 2021 Presidential Major Disaster Declaration (federal disaster declaration FEMA #4607 - Michigan Severe Storms, Flooding and Tornadoes). These funds were allocated through the publication of the Federal Register, Vol. 87, No. 100, May 24, 2022. This allocation was made available through the Disaster Relief Supplemental Appropriations Act Public Law 117-43. This funding will be administered through its Housing and Revitalization Department (HRD) in coordination with the Detroit Water and Sewerage Department (DWSD). CDBG-DR funding is designed to address needs that remain after all other federal assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in the City of Detroit.

Disaster Specific Overview

On June 25-26, 2021, Detroit experienced a 1 in 1,000-year rainstorm (0.01% probability), resulting in 6-8 inches of rain in a 12-hour period in some areas of the city. This amount of rain far exceeded the capacity of the city's infrastructure, which was designed to withstand 1.5-3 inches of rain in a 24hr period and was the root cause of flooding. Between 32,000 - 47,000 households (majority (82%) low-to-moderate income) were directly impacted by the disaster, majority of those located in City Council Districts 4, 6, 7.



Gauge Adjusted Radar Rainfall Total

Parts of Detroit received 8 inches or more of rain in a span of 12 hours which is the equivalent of a .01% probability storm.

The storm led to flooding on streets and freeways, as well as flooding in residential and commercial basements. In addition, there were power supply disruptions at the Freud and Connor pump stations, as well as collapsed sewer lateral service lines coming from single-family residences and capacity issues with the city's combined storm water and sewer system.

The following conditions were not the primary cause of the flooding, but they exacerbated the impact according to post event engineering analyses-

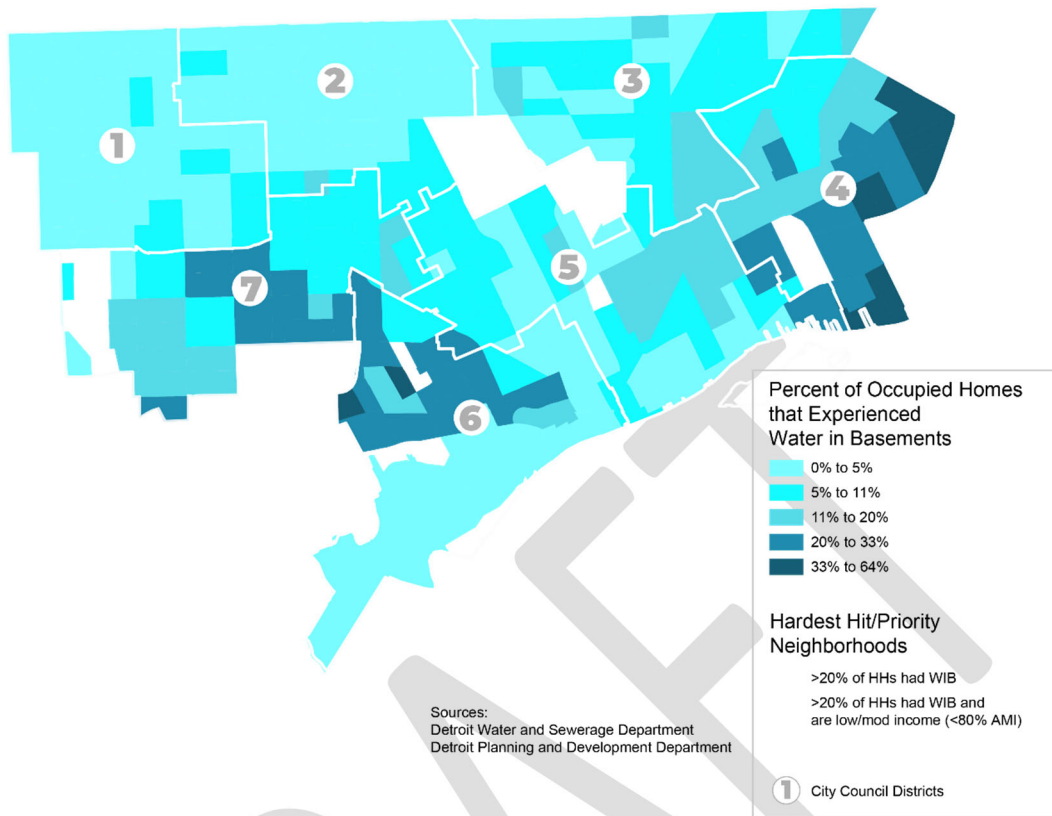
- The City's combined storm water and sewer system was only designed to handle a 10-year storm and the city was impacted by a 1 in 1,000-year storm.
- Four (4) of Twelve (12) pumps at Connor Creek and Freud pump stations lost power and stopped working, and a cable was severed on June 23 by a contractor.
- Freud Pump station had weak power supply and dipped in sustained voltage and was unreliable throughout the storm.
- The city has limited green storm water infrastructure, and the infrastructure in place was also not designed for this level of rainfall.

- The Detroit River overflowed due to the storm and as a result of high fluctuating lake levels.



Basement Back-Ups

One of the primary impacts of the storm was basement back-ups. Seventy percent (70%) of claims made to FEMA were related to water in basements as a result of the storm.

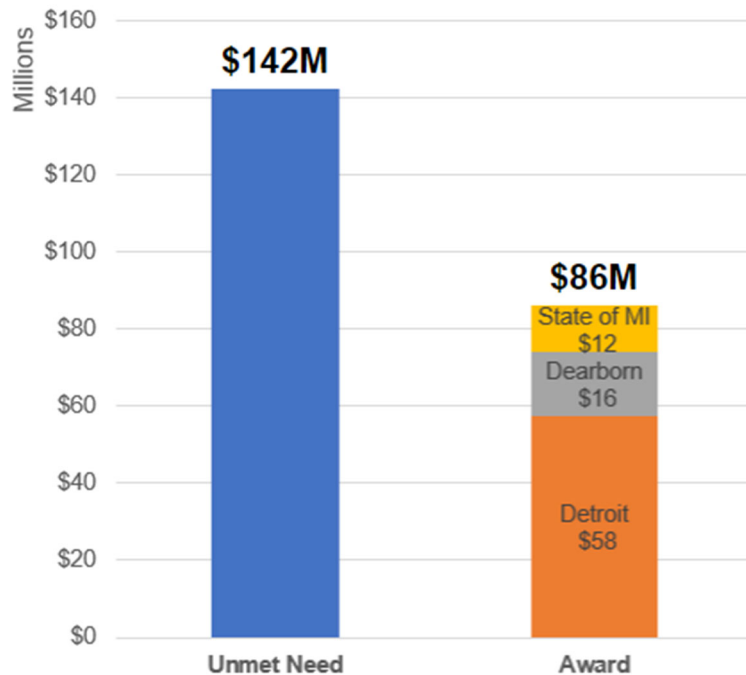


Percent of Occupied Homes that Experienced Water in Basements

Districts 4, 6, and 7 experienced the highest concentration of water infiltration of water in basements. The average height of water reported in FEMA claims was 10 inches.

Summary

HUD estimated that the total unmet needs for FEMA Disaster #4607 were approx. \$124MM for all impacted areas in the State of Michigan. However, only \$86MM was available in the congressional appropriation. The City of Detroit was awarded approximately 60% of the \$86MM, totaling \$57,591,000.



Unmet Need vs. CDBG-DR Award

HUD identified \$142MM of unmet need across the disaster impact areas in Michigan. By comparison, the congressional appropriation totaled \$86MM of which \$57.6MM was allocated for the Detroit Most Impacted and Distressed area (MID).

Based on the calculation of unmet needs provided by HUD utilizing FEMA data, 75% of the total unmet need for Detroit for the disaster equated to unmet Housing needs. That assessment correlated to the amount of FEMA Individual Assistance Claims and SBA Claims received as a result of the disaster, as well as logged complaints from the City of Detroit Water and Sewerage Department. The City of Detroit has identified housing and infrastructure that impacts residential flooding as key activities for addressing unmet need.

The level of unmet needs is significantly greater than the amount of funding available. Therefore, the City proposes activities that aligned with accessible funding and activities closest to the impacts of the disaster. The City held three meetings with residents and stakeholders, all of which were held virtually and promoted city-wide and to City Council Districts 4, 6 and 7 (most impacted districts). This assisted the city with aligning the proposed funding with resident needs. The City of Detroit has proposed using the CDBG-DR funding to address the following unmet needs: housing and protective infrastructure.

HUD estimated the total financial cost of unmet need to be \$124 million, with an additional 15% or \$18.5 million for mitigation activities. The unmet need calculation in disaster impact

areas in Michigan is comprised of: \$92.3 million housing, \$29.1 million business, and \$2.1 million in public assistance. The City of Detroit estimates that approximately 30,000 households experienced water in basements or other storm-related impact.

The City, through its HRD, anticipates delivering the proposed activities in coordination with DWSD. The primary objectives of this plan are to directly serve income eligible homeowners in most impacted neighborhoods by assisting with eligible home repairs that were impacted by the flooding, either directly or indirectly.

In addition, the city proposed investing in infrastructure activities both for recovery and mitigation, to provide flood protection to neighborhoods in the flood plain impacted by the disaster and prevent such impacts from happening again in the future. However due to overwhelming feedback and concern from residents, this activity is suspended at this time, and will be reevaluated at a later date.

Grantee Proposed Use of Funds

The City of Detroit is the lead agency and responsible entity for administering \$57,591,000.00 in CDBG-DR funds allocated for disaster recovery. As required by the FR Vol. 87 No. 100, the City of Detroit will allocate at least 80 percent of the funds to address unmet needs with HUD-identified “most impacted and distressed” areas which equates too city-wide. Furthermore, funds will be prioritized to serve resident in the most impacted neighborhoods of the MID.

The City is proposing that funds be used to repair or replace sewer service lines and install backwater valves at eligible households (at or below 80% AMI) and is also used to address any emergency housing needs (e.g. Furnace) caused by the flood on a case by case basis.

The City also proposed that funding be used for protective infrastructure to assist the Jefferson Chalmers neighborhood in getting out of the 100 year flood plain. However, during the public comment period, residents in the Jefferson Chalmers neighborhood stated overwhelmingly that they opposed using CDBG-DR funding for this activity at this time. Therefore, the City is suspending funding this activity at this time. Further outreach will be conducted a later date to determine how the \$10MM unallocated CDBG-DR funds will be used.

City of Detroit CDBG-DR Proposed Activities & Budget Allocation							
Program	Program Description	Program Budget	%	Estimated Reach (Households)	Activity Type	CDBG Eligible Activity	CDBG National Objective
Housing Recovery & Protection Program	Repair or replace sewer service lines and install backwater valves at eligible households (at or below 80% AMI) and emergency housing needs (e.g. Furnace) caused by the flood on a case by case basis.	\$43,211,450	75%	Up to \$30,000/HH Approx. 1,500-2,000 HH	Recovery	Housing Activities - 24 CFR 570.202	24 CFR 270.208(a)(3) –Activities benefitting Low-to moderate income persons (Housing LMH)
Jefferson Chalmers Flood Protection	Construct Protective Infrastructure in response to flooding	\$2,488,000	4%	Up to \$4300/HH Approx. 2500 HH	Recovery	Public Facilities and improvements- 24 CFR 570.201(c)	24 CFR 570.208 (a)(1) –Activities benefitting low-to-moderate income persons (Area-LMA)
Jefferson Chalmers Flood Protection	Construct Protective Infrastructure to prevent future flooding	\$7,512,000	13%	Up to \$4300/HH Approx. 2500 HH	Mitigation	Public Facilities and improvements- 24 CFR 570.201(c)	24 CFR 570.208 (a)(1) –Activities benefitting low-to-moderate income persons (Area-LMA)
Planning		\$1,500,000	3%	N/A	Planning		
Admin		\$2,879,550	5%	N/A	Admin		
TOTAL		\$57,591,000					

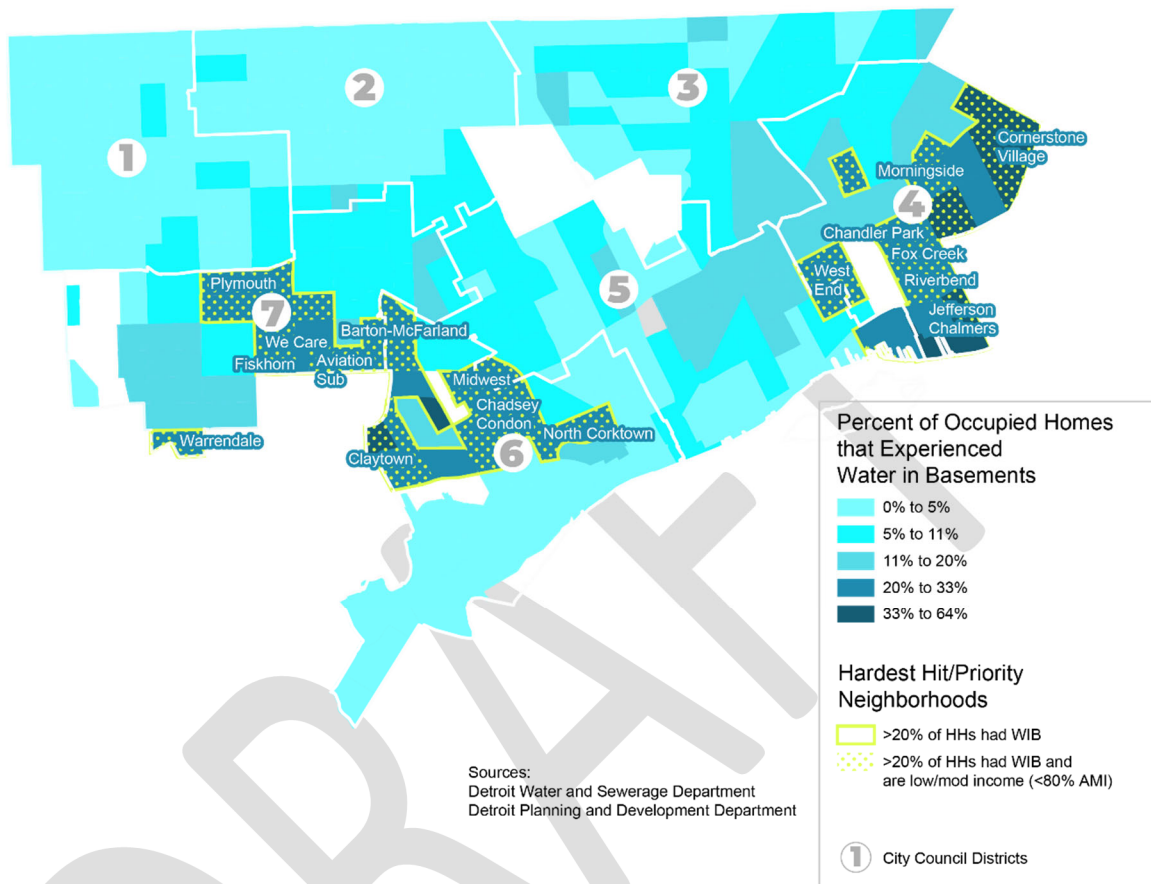
II. Unmet Needs Assessment

Overview

In accordance with HUD guidance, the City of Detroit analyzed the impacts of the disaster to identify the level of citywide damage, which will be used as the basis for an unmet needs assessment and identification of priorities for CDBG-DR funding. During the storms on June 25-26, 2021, more than 8 inches of rain fell in a 12-hour period in some areas of the city, causing flooding of homes, businesses, streets, and highways. While the entire City of Detroit was impacted by the storms, there were areas in the city that experienced more impact due to being in lower lying areas. This includes the following neighborhoods:

- District 4: Cornerstone Village, Morningside, Chandler Park, Fox Creek, Riverbend, Jefferson Chalmers, West End
- District 6: Midwest, Chadsey-Condon, Claytown, North Corktown, Michigan-Martin

- District 7: Aviation Sub, Garden View, Plymouth-I96, Plymouth-Hubell, Paveway, We Care Community, Fiskhorn, Joy-Schaefer, Warrendale, Warren Ave Community, Barton-McFarland



Percent of Occupied Homes that Experienced Water in Basements X Low-to Moderate Income Neighborhoods

With a few exceptions, most hardest hit neighborhoods are also low-to-moderate income neighborhoods.

The City of Detroit, through its unmet needs assessment, identified various unmet needs, especially related to Housing and Infrastructure. Many residential neighborhoods experience basement backups due to a variety of factors, including but not limited to, rain events beyond the capacity of the existing public sewer system, power failures that impact pumping stations, and private infrastructure such as collapsed or cracked sewer lateral service lines attached to houses. These issues can exacerbate a significant rain event that causes basement backups. In addition, the city experienced flooding of highways and streets due to aging infrastructure and climate change.

During the June 25-26, 2021 rain event, up to 8 inches of rain took several days to recede from basements and streets, and it took more than two months to remove debris and clean and sanitize basements of our most vulnerable population, and some residents, due to lack of resources, had to wait even longer. Detroit Department of Public Works and General Services Division removed and picked up debris in all impacted neighborhoods. The DWSD not only cleaned public sewers and street catch basins, DWSD also contracted to have several hundred basements cleaned and sanitized for seniors, persons with disabilities and those with young children in the home.

In Michigan, specifically in Detroit, most families use their basements as family rooms or recreation areas and for storage, including for some of their most cherished belongings. Not only did the homes have basement backups in June 2021, two lower eastside neighborhoods had backups in June 2016 after a heavy rainstorm, and several neighborhoods across the city experienced basement backups and flooding in August 2014, with a rainfall of 4.57 inches. Those few homeowners that were able to take measures to protect their basements after the 2014 and 2016 rain events, - such as installing backwater valves, did not experience basement backups and in-home flooding during the June 25-26, 2021 storm. However, due to the city's poverty level and 49% rental rate of single-family homes, most residents that continue to have basement backups are unable to install a backwater valve and maintain their sewer lines, which is why the City launched the Basement Backup Protection Program in May 2022 and seeking the HUD funding to add sewer lateral service line replacement.

Housing Unmet Need

Disaster Damage and Impacts – Housing

While the disaster led to many unforeseen circumstances for Detroit residents, the housing unmet needs predate the date of the disaster. 25% (roughly 68,000) of Detroit households were cost burdened prior to the disaster. Consequently, disaster recovery expenses fell on homeowners already experiencing economic hardships. The proposed activities will improve access to safe and healthy housing for low-to-moderate (LMI) people who otherwise do not have access to the resources to prevent the impacts of disasters such as these. LMI Detroit residents can face unique challenges and have more difficulty responding to disaster events than the general population due to physical and financial capabilities, health concerns, and location and quality of their housing, among other factors. While CDBG-DR requires that at least 70% of all program funds will benefit LMI persons or households, the City is proposing that all activities proposed will benefit LMI persons or households.

Single Family v. Multi-family Needs; Owner Occupied v. Tenant

The housing stock in the City of Detroit is comprised overwhelmingly of detached, single-family houses. A 2015 study found that roughly 65% of Detroit's housing stock was single-family houses, nearly all of which were detached dwellings. Detached duplexes are also a standard of Detroit's housing typology, but the study found that duplexes accounted only for another 7% of the overall stock.¹

These typological characteristics were born out in FEMA claims data. Nearly all claims---94% to be specific---concerned damages to single-family and duplex properties. This statistic makes intuitive sense. Detroit's far-flung neighborhoods are mostly suburban in character, and these are precisely the neighborhoods that were among the hardest hit.

However, unlike typical detached single-family neighborhoods across the United States, in Detroit, many residents of such neighborhoods rent. This is, tragically, in large part an outcome of the foreclosure crisis and Great Recession. In 2021, an estimated 49% of occupied Detroit housing units were renter-occupied.² This figure is consistent with FEMA claims data---47% of FEMA claimants were renters.

Due to lack of available funding, the City of Detroit is not proposing using CDBG-DR to serve multi-family units at this time. Only units defined as single-family will be eligible for CDBG-DR Housing Recovery and Protection Programs. Single Family units are defined as structures that have 4 or less units. Multi-Family units are defined as those with 5 or more units.

Definition of Affordable Rents

While not applicable to the proposed activities but required by HUD for purposes of the Action Plan, the federal government defines affordable rents as housing costs that do not exceed 30% of a household's monthly income. For renters, these costs include rent and basic utilities (electric, gas and water). There are two basic types of affordable rental housing in Detroit:

- *Naturally occurring: This type of housing is not government regulated but is considered affordable to households at market rate because costs amount to less than 30% of their monthly income.*
- *Regulated: This type of housing is subsidized by government programs to ensure that low-income households do not pay more than 30% of their income on rent, or that rents are restricted at a level that is affordable for low-income households.*

There are two broad categories of regulated affordable housing:

¹ <https://www.washingtonpost.com/news/wonk/wp/2015/09/21/the-most-popular-type-of-home-in-every-major-american-city-charted/>

² [US](#) Census Bureau. 2021 American Community Survey

- *Public Housing: Owned and operated by Detroit Housing Commission.*
- *Other regulated housing: Privately owned but offer affordable rents for low-income tenants.*

Social Equity, Fair Housing and Civil Rights

It is the goal of City that when funding decisions are made regarding CDBG-DR, that these decisions advance equity and reduce barriers that residents may face when accessing federal funding. The City considered this in both its outreach to residents for public feedback on the CDBG-DR Action Plan, and in the initial program design for the proposed activities.

HRD has performed an assessment, using the U.S. Census, of Detroit's vulnerable populations, including members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, and concentrated areas of poverty.

The U.S. Census Bureau reports that as of the 2020 Census, the City of Detroit is estimated to have a population of 639,111 people. Of the total population, the U.S. Census estimated the following (population estimates as of July 1, 2021):

- 546,653 or 85.5% of the population is low-to moderate income and the median household income is \$32,498
- 33.2% of the population lives in poverty
- 496,534 or 77.7% of the population is Black or African American
- 52.7% of the population is female
- 13.9% of the population is 65 years of age or older
- 15.3% of the population under the age of 65 has a disability
- 5% of the population has limited English proficiency

The proposed uses of CDBG-DR are for low-to moderate income households only. All marketing materials specific to CDBG-DR programs will include detailed information on who is eligible, how eligible residents can apply and how applicants will be prioritized due to the amount of need versus funding available. HRD will coordinate with the Department of Neighborhoods, and non-profit organizations serving targeted neighborhoods, to ensure there is sufficient notice of program launch.

HRD used U.S. Census data to inform the types of accommodations needed for outreach related to the Action Plan, and will implement the similar measures below for program outreach and launch to reduce barriers applicants may face when enrolling in the program:

- Information was released on several different platforms, including the CDBG-DR Webpage, HRD's Social Media platforms, Department of Neighborhoods newsletters and "DONcasts", and featured on the City's Channel 10 used for resident programming, and email blasts to non-profit partners serving low-to moderate income residents.

- Meetings were accessible by phone and online via the Zoom platform and although held in the evening, meetings were recorded and shared on the Disaster Recovery webpage for residents to access on demand.
- Closed caption was used during the meetings to assist attendees, and the City's Department of Civil Rights, Inclusion and Opportunity Department (CRIO) offered interpreter services including interpretation services and reasonable ADA accommodations.
- All flyers for the meetings as well as the meeting presentation slides were translated into Spanish, Bengali and Arabic, and posted to the Disaster Recovery Webpage.

LMI Analysis – Overall & Federally Declared Disaster Areas

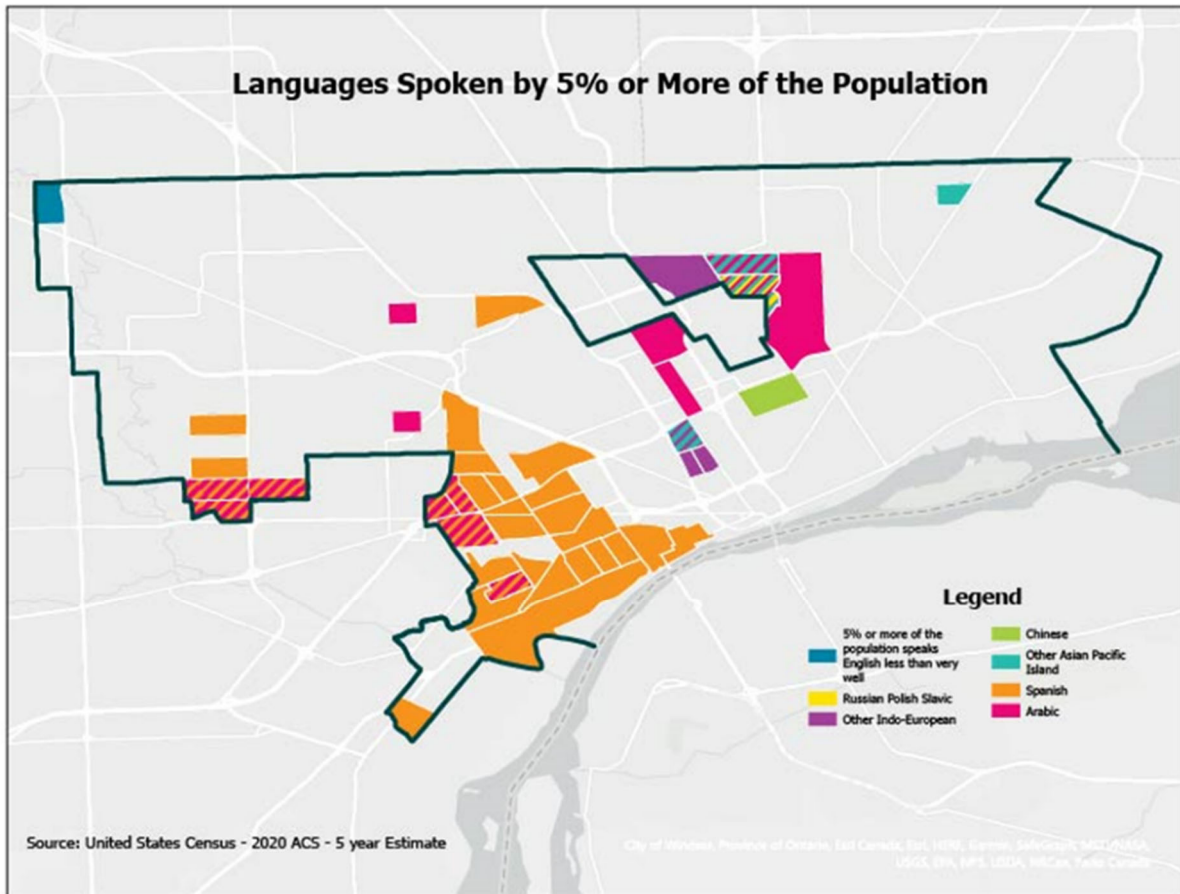
Municipality	Non-MID Total LMI Persons	Non-MID total Population	Non – MID Percentage LMI	MID – Total LMI Person	MID Total Population	MID – Percentage LMI
Detroit	*	*	*	546,653	639,111	85.5%

***The entire City of Detroit has been declared a MID, therefore there is no Non-MID population.**

Limited English Proficiency Breakdown of Disaster – Related Areas

	Number of Speakers in MID Area	Percent of Population in MID Area
Limited English Proficiency	89,882	5.5%
Arabic	88,792	5.4%
Spanish	66,811	4.1%
Other Indo-European Language	41,331	2.5%
Other Asian Pacific Island Language	9,061	0.6%
Russian, Polish, Slavic	8,583	0.5%
Chinese	4,992	0.3%

In Detroit, 89,882 people speak English with limited proficiency. The main languages spoken at home are Arabic, Spanish, and Bengali. There are 88,792 Arabic speakers, 66,811 Spanish speakers, and 41,331 speakers of other Indo-European languages. The map below shows census tracts where 5% or more of the population has limited English proficiency and where 5% or more of the population speak another language at home.



Languages Other Than English Spoken by 5% or More of the Population

Three of Detroit's primary languages are not English. Arabic is spoken in neighborhoods bordering Dearborn, Bengali is spoken in neighborhoods bordering Hamtramck, and Spanish is spoken in Southwest Detroit.

Infrastructure Unmet Need

Disaster Damage and Impact – Infrastructure

The City of Detroit experienced a 1000-year storm in June of 2021. The City's infrastructure is built for a ten-year flood, and the disaster pushed existing systems over their capacity. Leading up to the storm, Detroit Water and Sewage Department (DWSD) routinely maintained sewer-catch basin cleanout throughout the city. This is important because there is a combined sewer system where all sewage from residential, commercial, and industrial sources flow to the same place. Fluctuating lake levels add pressure on the sewer system. If there is a rise in lake or river levels, that water also flows to the sewer system. Lower lying areas like Jefferson – Chalmers, are in the 100-year flood plain zone, and are greatly impacted by fluctuating lake levels.

Detroit's impervious surfaces cause stress on the sewer system by funneling stormwater into sewers instead of absorbing it into the ground. In addition, much of the surrounding counties drain through the City of Detroit, making Detroit the bottom of the water shed. Based on a sample of DWSD customers, approximately 30,000 houses have broken lateral tie ins. Key water treatment pumping stations have inconsistent, weak power supply. Consequently, heavy rain events, like the storm in June, can cause all combined sewage and rainwater to overflow into basements, residential streets, and local highways.



Area flooded freeway from storm

Recognizing the City's long and well-documented infrastructure challenges, as well as its ongoing efforts to mitigate future flooding in our most vulnerable areas, the City of Detroit is committed to rebuilding resiliently. In assessing unmet needs, it is important to consider the additional costs of safeguarding housing and community development investments from future disasters. As such, City of Detroit will also seek to invest resources in efforts that mitigate damage from future disasters. Mitigation options include the following:

- Protective Infrastructure as one of the City's recovery and mitigation projects will be developed in a manner that considers an integrated approach to housing, infrastructure, economic revitalization, and overall community recovery. The City of Detroit will

³ November 23, 2021. Detroit homes are being overwhelmed by flooding — and it's not just water coming in. *NPR*. <https://www.npr.org/2021/11/23/1037540261/detroit-homes-are-being-overwhelmed-by-flooding-and-its-not-just-water-coming-in>

continue to work with Federal, State and neighboring local jurisdictions to provide guidance on promoting a sound short-and-long term recovery plan in the affected areas by coordinating available resources to help in the restoration and recovery of damaged communities. Disaster recovery presents affected communities with unique opportunities to examine a wide range of issues such as housing quality and availability, environmental issues, and the adequacy of existing infrastructure. The City of Detroit will support long-term plans put in place by local and regional communities that promote the future well-being of these damaged areas by the hardening of homes and infrastructure so that communities withstand future disasters. The City of Detroit will coordinate with other local and regional planning efforts to leverage those efforts as much as possible. *During the public comment period, residents of the Jefferson-Chalmers neighborhood overwhelmingly opposed this activity. At this time, this activity is being suspended, and further outreach will be conducted a later date to determine the City's mitigation activity.*

Economic Revitalization Unmet Needs

Disaster Damager and Impact – Economic Revitalization

The disaster's impact on businesses was less severe than its impact on housing. FEMA and SBA claims data show that residential areas comprised a majority of the impact area. In total, 66,356 claims were submitted to FEMA for residential damages versus the 16,786 applications that were submitted to SBA for business damages. Moreover, 90% of the SBA applications for businesses concerned home-based businesses.

Businesses were also more likely to carry insurance for the damages they incurred. Only 28% of SBA applicants lacked insurance versus the 70% of FEMA claimants who lacked it.

In the end, just 202 (1.2%) out of the total 16,786 SBA applications were approved for non-residential businesses. SBA assessed the unmet need of these applications at \$3.2 million, which is an average of roughly \$16,000 per applicant.

While these statistics may be stark, they are not surprising. The hardest hit areas of the MID were residential neighborhoods, not job centers or entertainment destinations. Most economic activity in Detroit neighborhoods is retail-oriented, a sector that has suffered for decades dating back to the mid-1900s when retail flight followed white flight to the suburbs. Since then, institutional barriers in the financial industry and elsewhere have suppressed the retail economy in Detroit. As a result, retail businesses in Detroit neighborhoods are few and Detroiters often shop in the suburbs or online to meet their needs. Hence, the impact of the disaster on businesses was limited.

III. Mitigation Needs Assessment

As required by HUD, the City of Detroit developed a mitigation needs assessment based in part on the FEMA approved ⁴City of Detroit Hazard Mitigation Plan. This assessment addresses current and future risks, including hazards, vulnerability, and impacts of disasters and identifies appropriate mitigation actions to reduce the highest risks that Detroit faces.

Overview of City of Detroit Hazard Mitigation Plan

The goal of the Hazard Mitigation Plan (HMP) is to minimize or eliminate long-term risks to human life and property from known hazards by identifying and implementing cost-effective hazard mitigation actions. The City of Detroit's HMP extensively reviews alternatives and designed strategies that would work best for the City. The plan provides carefully considered directions to City government by studying the overall damage potential and ensuring that funds are well spent.

Hazard mitigation does not mean that all hazards are stopped or prevented. It does not suggest complete elimination of the damage or disruption caused by such incidents. Natural forces are powerful, and most natural hazards are well beyond our ability to control. According to the Federal Emergency Management Agency (FEMA), hazard mitigation includes any sustained action taken to reduce or eliminate long-term risk to life and property from future disasters. Every community, including Detroit, faces different hazards and has different interests and resources to bring to bear to address its problems. As there are many ways to deal with natural hazards and many agencies that can help, there is no one solution to managing or mitigating their effects.

Risk Landscape – Current and Future Hazard

Located in southeastern Michigan, Detroit is the largest city in Michigan, and the 26th largest city in the United States in 2020. ⁵Founded in 1701, the city was named the Ville d'Étroit or "City of the Straight" because of its position on the Detroit River. The Detroit River separates the City of Detroit from the City of Windsor, Ontario and serves as an international boundary between the United States and Canada.

Detroit is on the northern banks of the Detroit River and south of Lake St. Clair. The land area of Detroit comprises 138.7 square miles and has an altitude of 581 feet, as measured at the Detroit River.

⁴ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022. by Detroit Office of Homeland Security & Emergency Management.2022.https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

⁵ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022.pg 5. https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

Due to the increase in developments across the City of Detroit, the floodplains are impacted which contributes to flooding being a major hazard in Detroit. Prior to the developments, rainfall would simply soak into the ground, or slowly find its way to the river. With impervious surfaces the rainfall runs off quickly to the streets and man-made channels and pipes. Floods cause significant damage to public and private property, disable utilities, make roads and bridges impassable, destroy crops and agricultural lands, cause disruption to emergency services, and result in fatalities.

The Detroit MHP developed a risk assessment to rate the likelihood of any disaster harming Detroit. Below charts 1, 2, and 3 at illustrate Flooding as the greatest hazard risk for the City of Detroit.

Hazard	Potential for Causing Death	Population Affected	Property and Economic Damage	Local Response Capability
Flooding	2	4	4	5
Infrastructure Failure – Energy Emergency	1	4	3	3
Structural Fires	4	2	3	4
Extreme Winter Weather	3	5	1	2
Extreme Summer Weather	2	2	2	2
Hazardous Materials Releases	4	2	2	3
Public Health Emergencies	3	2	1	2
Civil Disturbance	2	2	3	2
Public Transportation Accidents	3	2	1	3
Petroleum and Natural Gas Pipeline Accidents	2	3	2	2
Drought	2	2	0	2
Nuclear Power Plant Accidents	1	2	3	2
Oil/Natural Gas Well Accidents	0	1	3	2
Earthquake	1	1	1	2

Chart 1. Hazard Risk

⁶ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022, https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

Hazard	Likelihood of Occurrence (25%)	Potential for Causing Death (25%)	Population Impacted (20%)	Physical and Economic Damage (20%)	Local Response Capability (10%)	Total	2015 Rank	2021 Rank
Civil Disturbance	2 (.50)	2 (.50)	2 (.50)	3 (.60)	2 (.20)	2.30	5	8
Drought	2 (.50)	2 (.50)	2 (.40)	0 (.0)	2 (.20)	1.70	11	11
Earthquake	1 (.25)	1 (0.25)	1 (.20)	1 (0.20)	2 (.20)	1.1	10	14
Infrastructure Failure	5 (1.25)	1 (0.25)	4 (.80)	3 (.60)	3 (.30)	3.20	3	2
Extreme Summer Weather	4 (1)	2 (.50)	2 (.50)	2 (.40)	2 (.20)	2.60	6	5
Extreme Winter Weather	4 (1)	3 (.75)	5 (1)	1 (.20)	2 (.20)	3.15	1	4
Structural Fires	3 (.75)	4 (1)	2 (.40)	3 (.60)	4 (.40)	3.15	2	3
Flooding	3 (.75)	2 (.50)	4 (.80)	4 (.80)	5 (.50)	3.35	6	1
Hazmat Releases	2 (.50)	4 (1)	2 (.40)	2 (.40)	3 (.30)	2.60	7	6
Nuclear Power Plant Accident	1 (.25)	1 (.25)	2 (.40)	3 (0.60)	2 (.20)	1.70	9	12
Oil/Natural Gas Well Accident	1 (.25)	0 (.0)	1 (.20)	3 (.60)	2 (.20)	1.25	9	13
Pipeline Accident	1	2	3	2	2	1.75	12	10

Hazard	Likelihood of Occurrence (25%)	Potential for Causing Death (25%)	Population Impacted (20%)	Physical and Economic Damage (20%)	Local Response Capability (10%)	Total	2015 Rank	2021 Rank
	(.25)	(.50)	(.60)	40	(.20)			
Public Health Emergency	4 (1)	3 (.75)	2 (.40)	1 (.20)	2 (.20)	2.55	4	7
Public Transportation Accident	2 (.50)	3 (.75)	2 (.40)	1 (.20)	3 (.30)	2.15	8	9

Chart 2

Significant Natural Hazards						
Natural Hazard	Time of Potential Occurrence				Last Major Event	
	Spring	Summer	Fall	Winter	Year	Location
Energy Emergency	X	X	X	X	2021	City-Wide
Extreme Summer Weather	X	X			2020	City-Wide
Extreme Winter Weather			X	X	2021	City-Wide
Structural Fires	X	X	X	X	2021	City-Wide
Hazardous Materials Release	X	X	X	X	2019	SW Detroit
Public Health Emergency	X	X	X	X	2020	Nationwide
Floods	X	X	X	X	2021	City-Wide

Chart 3. Significant Natural Hazard

As the risk assessment tables demonstrate, flooding is at the forefront of Detroit's hazard risks. Consequently, mitigation activities will be geared towards reducing the potential losses and preventing Detroit's vulnerability to flood disaster events.

Hazard & Vulnerability Risk Analysis

⁷Flood Insurance History

The City of Detroit has been a part of the National Flood Insurance Program (NFIP) since 1974

⁷ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022,pg 36-38. https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

with an initial Flood Insurance Rate Map (FIRM) identified in 1981. In 2017, the City joined the Community Rating System (CRS) and maintains a Class 8 rating.

According to NFIP, there are 403 policies in force in Detroit. These policies provide insurance worth \$82,121,200 as of 2021. The NFIP Repetitive Loss/Severe Repetitive Loss data provided indicates a total of 64 RL/SRL properties with a net total claim of \$1,437,151.30. The National Center for Environmental Information (NCEI) estimates total property losses for a 15-year period to be \$169,600,000 for an average loss of \$11.3 million per year. These figures would suggest that adequate coverage is provided to those who would be most impacted by river flooding in Detroit. According to NOAA, the River Rouge crested above flood stage in Detroit on 41 occasions between 1968 and 2021. When combined with other flooding events recorded through NCEI records, such as heavy rain or snow melt, the city has experienced 2.96 flooding events per year since 1978.

⁸Most Recent Disaster

Prior to the June 2021 event, in August 2014, the City of Detroit had an unusually extreme amount of rainfall that created flood conditions in the Metropolitan Detroit area. The National Weather Service say that the total of 4.57 inches of rain that fell for the day is the second heaviest calendar-day rainfall on record in Detroit, after the 4.74-inch rainfall of July 31, 1925. The flooding closed major freeways, hospitals, businesses, schools and government offices. This storm has been categorized by some weather experts as a 100-year type of event. Almost 10 billion gallons of sewer overflows poured into southeast Michigan's waters in the historic August flooding, according to a Detroit Free Press review of data from the Michigan Department of Environmental, Great Lakes and Energy.

Conclusion of Mitigation Needs Assessment

This Mitigation Needs Assessment makes it clear that historically, flooding has been a major hazard for the City of Detroit. By characterizing the hazard in terms of its frequency and the City's vulnerability, the City can draw on this needs assessment and the HMP to identify current and future flood hazards throughout the City of Detroit and target CDBG-DR funds toward cost-effective solutions to mitigate flooding over the long term. In addition, this assessment further supports proposed CDBG-DR mitigation activities undertaken as part of this allocation so that, at a minimum, they do not exacerbate hazards but rather serve to lessen their impacts.

Mitigation Activities

The City of Detroit's mitigation project will increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters. Incorporation of these measures also

⁸ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022. Pg.40-42. https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

reduces costs in recovering from future disasters. Mitigation measures that are not incorporated into those rebuilding activities must be a necessary expense related to disaster relief, long-term recovery, and restoration of infrastructure, housing, or economic revitalization that responds to declared disaster FEMA-4607-DR-MI. The City of Detroit is proposing to construct protective infrastructure in the Jefferson Chalmers neighborhood as the mitigation activity. This activity will reduce the amount of homes in the floodplain zone, preventing future impacts from flooding and lake fluctuation levels and allow homeowners to be eligible for federal funding without needing flood insurance. Regular homeowners' insurance already presents a cost burden to many Detroit residents, flood insurance requirements present an even larger cost burden, creating additional barriers to federal assistance for low-to moderate income households. However, during the public comment period, residents of the Jefferson-Chalmers neighborhood overwhelmingly opposed this activity. Therefore, this activity is being suspended. Further outreach will be conducted a later date to determine the City's mitigation activity.

IV. General Requirements

Outreach and Engagement

The City of Detroit will hold three public meetings, all virtually (one city-wide and one for district 4, one for district 6/7). Citizens will be notified through the Housing and Revitalization Department's GovDelivery email, social media public notice, media advertisements and through the City of Detroit's Department of Neighborhoods. The city will work with Civil Rights Inclusion Opportunity (CRIO) to provide LEP services, including ASL and translation services at all meetings.

In the development of this disaster recovery action plan, the City of Detroit consulted with disaster-affected citizens in the most impacted areas in Districts 4,6,7, stakeholders like Jefferson East Inc., Midwest Council, and Chadsey Condon, local governments such as the City of Dearborn and the State of Michigan, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive.

In addition to the activities above, the City of Detroit will publish the action plan on the City of Detroit's Disaster Recovery webpage for a 30-day public comment period. Citizens will be encouraged to present their comments and opinions on the proposed plan at the public hearing, or by mail, email, or telephone directed to the offices of the Housing and Revitalization Department. Citizens will be notified via email blast at GovDelivery and Department of Neighborhoods list serves, social media outlets, and public service announcements. The City of Detroit will ensure that all citizens have equal access to information, including persons with disabilities and limited English proficiency (LEP).

Comments and opinions on the proposed action plan will be considered by the city when preparing the final action plan. A summary of comments and views received will be attached to the final plan. A summary of the reasons for not accepting opinions or views not included in the plan will also be attached to the final plan. A draft will be available on the City's website. Citizens can provide comments via email at ***disasterrecovery@detroitmi.gov***. For more information, citizens can refer to the City of Detroit's Citizen Participation plan at: <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>

Public Hearings

The City of Detroit will hold three virtual public hearings to inform residents city wide and in the MID areas. The most impacted and distressed neighborhoods from the June 2021 disaster are Districts, 4,6, and 7 based on the number of DWSD basement flooding claims.

Complaints

The city will respond to written complaints related to the CDBG-DR Action plan and substantial amendments in a timely manner. Complaints are encouraged to be submitted via email at disasterrecovery@detroitmi.gov but may also be submitted via telephone at 313-224-6380 or by mail to:

City of Detroit
2 Woodward Ave.
Suite 908. Housing and Revitalization Department (HRD)
Detroit, MI 48237.

Formal complaints may be made in person at public meetings and hearings, by mail, email and by telephone to the offices of the Housing and Revitalization Department (HRD). Response to written complaints will be made in writing within 30 days, where practical. Persons with complaints will be encouraged to put such complaints in writing with appropriate documentation. Informal complaints may be oral complaints at public hearings, meetings, and by telephone. When possible, City staff will try to respond orally to such complaints immediately. In some instances, persons making oral complaints will be asked to put the complaint in writing with appropriate documentation. In other instances, the City has and will respond within 30 working days either orally or in writing as appropriate and convenient.

Owners of property assisted with CDBG-DR funds will also be provided with opportunities to appeal the quality of work on their properties. The CDBG-DR Program Manager or their designee will review the appeal, and then either approve or deny the appeal. The owner will be notified in writing of the decision made within 30 days of the appeal. If the owner is not satisfied with the decision, the appeal is escalated to the Director of the Housing and Revitalization Department, where the Director has the final say. There's a limited time to respond to the appeal and all responses are provided in writing.

A record of each filed complaint or appeal is kept in an information file. When a complaint or appeal is filed, HRD will respond to the complainant or appellant within 30 business days where practicable. For expediency, HRD will utilize telephone communication as the primary method of contact, email and postmarked letters will be used as necessary to document conversations and transmit documentation. Information about the right and how to file a complaint shall be printed on all program applications, guidelines, and HRD's public website for CDBG-DR in all local languages, as appropriate and reasonable. Procedures for appealing an HRD decision on a complaint shall be provided to complainants in writing as part of the complaint response.

Public Website

In accordance with Federal Register Vol. 87, No. 100, the City of Detroit must have procedures to maintain a comprehensive public website that permits individuals and entities awaiting assistance and the general public to see how all grant funds are used and administered. As a result of CDBG-DR funds being appropriated, the city has created a separate CDBG-DR webpage <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>.

The City's CDBG-DR webpage will be updated on a regular basis (at minimum, monthly) in accordance with established procedures and standards so that it will contain links to information regarding the use and management of grant funds. Links to all action plans and action plan amendments, performance reports, citizen participation notices, and program information for activities described in the action plan. Contracts and procurement actions that do not exceed the federal micro-purchase threshold, as defined in 2 CFR 200.1, are not required to be posted to the City's website.

To ensure meaningful access to the CDBG-DR programs and activities by LEP persons, including individuals from underserved communities, the City will make all documents accessible to persons with disabilities and those with limited English proficiency (LEP) available to the public upon request.

Amendments

A substantial amendment to the Action Plan will follow the same procedures for publication as the original Action Plan in accordance with the city's Citizen Participation Plan. All amendments, both substantial and non-substantial, will be posted on the city's CDBG-DR website. The beginning of every amendment will include a section that identifies the content that is being added, deleted, or changed. In addition, this section will include a revised budget allocation table that reflects the entirety of all funds and will clearly illustrate the movement or reallocation of program funding. The city's most recent version of the entire Action Plan will be accessible for reviewing as a single document at any given time.

Substantial Amendment

When a substantial amendment to the action plan is being considered, a notice will be published on the City's website and distributed via GovDelivery and Department of Neighborhoods list serves and social media outlets, in adherence with ADA and LEP

requirements, that the city intends to amend the action plan. This notice will describe the amendment and indicate how citizens may comment on it. A period of at least 30 days of the posting will be provided for citizens to comment on the amendment before it is an implemented substantial amendment. The City will consider, review, and respond to all public comments and views received on proposed substantial amendments and submit to HUD for approval. A summary of these comments and views will be attached to the to the substantial amendment. If comments and views are not accepted, the reasons for not accepting them will be summarized and attached to the substantial amendment.

At a minimum, the following modifications will constitute a substantial amendment:

- A change in program benefit or eligibility criteria.
- the addition or deletion of an activity.
- a proposed reduction in the overall benefit requirement, or
- the allocation or reallocation of more than \$3 million from one major program area to another (the four major program areas are Housing, Infrastructure, Economic Development and Planning)

Non-Substantial Amendment

Although non substantial amendments do not require HUD's approval or seek public comment to become effective, the City will notify HUD of any plans to make an amendment that is not substantial. The City will notify HUD five (5) business days before the change is effective.

The city understands that the DRGR system must approve the amendment to change the status of the Public Action Plan to "reviewed and approved." The DRGR system will automatically approve the amendment by the fifth day, if not completed by HUD sooner.

Displacements of Persons and Other Entities

The City of Detroit will minimize displacement of persons or entities as a result of the implementation of CDBG-DR projects by ensuring that all CDBG-DR programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended (49 CFR Part 24) and the implementing regulations at 24 CFR Part 570.496(a). All subrecipients will be required to demonstrate that they have adopted policies and procedures to minimize displacement in accordance with these regulations and will be monitored by the city to ensure compliance with URA.

Per Federal Register 87, Vol. 100, section II. D.7: CDBG-DR funds may not be used to support any Federal, state, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. For purposes of this paragraph, public use shall not be construed to include economic development that primarily benefits private entities. Any use of funds for mass transit, railroad, airport, seaport or highway projects, as well as utility projects which benefit or serve the general public including energy related, communication-related, water related, and wastewater-related infrastructure), other

structures designated for use by the general public or which have other common-carrier or public-utility functions that serve the general public and are subject to regulation and oversight by the government, and projects for the removal of an immediate threat to public health and safety or brownfields as defined in the Small Business Liability Relief and Brownfields Revitalization Act (Pub. L. 107–118) shall be considered a public use for purposes of eminent domain.

Protection of People & Property

The City of Detroit will implement activities that will ensure high quality, durability, energy efficiency, sustainability, and mold resistance. The City will adopt and enforce modern and resilient building codes that mitigate hazard risk from flooding and comply with Green Building standards.

Elevation Standards

The City of Detroit, where applicable, will adhere to the provisions recognized under the City of Detroit's Specific Flood Elevation Standards and flood hazard reduction (Section 50.14-528-529). Provisions for new construction and substantial improvements of residential and non-residential structures in all flood hazard areas must have the lowest floor, including the basement, elevated to or above the base flood level; or be constructed so that the structure below base flood level together with attendant utility and sanitary facilities, is watertight with walls substantially impermeable to the passage of water and with structural components having the capability of resisting hydrostatic and hydrodynamic loads and effects of buoyancy. These codes recognize that the most recent base flood elevation data received from Federal Emergency Management Agency shall take precedence over data from other sources. Mixed-use structures with no dwelling units and no residents must be elevated or floodproofed up to at least two feet above base flood elevation. The average cost associated with elevating structures is:

- To raise an existing home approximately 36" and install a flood proofed and vented foundation would be \$45 per square foot x number of floors, limit 3. No basement.
- To raise an existing home approximately 36" and install a flood proof pier supports with skirting would be \$30 per square foot x number of floors, limit 3. No basement.
- New construction with flood proofing and vented foundation \$6.50 per square foot for each 1 foot of elevation above finish grade. No basement.
- New construction with piers and skirting \$4 per square foot for each 1 foot of elevation above finish grade. No basement.

Flood Insurance Requirements

The City of Detroit may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has received federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property.

The City of Detroit is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

1. The combined household income is greater than 120% AMI or the national median,
2. The property was in a floodplain at the time of the disaster, and
3. The property owner did not maintain flood insurance on the damaged property.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:

1. the homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
2. The household earns less than 80% AMI or the national median and has unmet recovery needs.

Construction Standards

The City of Detroit will require quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

The City will meet construction standards on all rehabilitation, reconstruction, or new construction activities found in the Consolidated Notice (II.B.2.a through II.B.2.d) as applicable to the proposed activities.

Contractor Standards

The City of Detroit will follow general labor standards provisions when applicable, which indicates that the Contractor shall require and monitor all construction work for compliance with all applicable Federal Labor Standards, as described in the clauses found in the regulations at 2 CFR 200 and shall report any noncompliance to the HRD, as required by Federal regulations.

The City shall require that all necessary contract language required by the regulations at 2 CFR 200 and (2) by City of Detroit Executive Order 2016-1 be included in all construction contracts and subcontracts for construction performed under this Agreement. If the Contractor should directly employ workers on actual construction, the Contractor shall comply with (1) all Federal labor standards applicable to the employment of such workers; and (2) City of Detroit Executive Order 2016-1.

The Contractor shall monitor all construction work performed under their Agreement or performed under the supervision and/or control of the Contractor for compliance with all applicable Federal Labor Standards, including those described at 2 CFR 200 and shall comply and/or require compliance with City of Detroit Executive Order 2016-1, and shall report any

noncompliance with said Federal requirements and with said Executive Order 2016-1 to the HRD.

The City of Detroit will require a warranty period post-construction with a formal notification to beneficiaries on a periodic basis. The City intends to issue a notice to homeowners halfway during warranty period (6 months from the date of final inspection) and one month prior to the expiration of the warranty. The City will also provide opportunities to appeal the quality of work on their properties. For the contractor to receive final payment, the property owner will be required to sign off on a completion of work form that states that all work has been performed in accordance with the construction contract to their satisfaction.

The City follows HUD guidelines for cost reasonableness. Costs are considered 'reasonable' if they do not exceed what a prudent person would incur under similar circumstances. All costs must pass the 'rational person' test by meeting all the following criteria:

1. The cost is recognized as ordinary and necessary for the operation of the project
2. The cost is in accordance with market prices for comparable goods or services as evidenced by cost estimates and documentation
3. The individuals responsible for incurring the cost acted with prudence and for the benefit of the organization and its activities
4. The cost has been incurred after following the established practices of the organization, in accordance with the terms and conditions of the award

Contractors selected under the CDBG-DR program will make every effort to provide opportunities to low and very-low-income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. The City of Detroit will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

Preparedness, Mitigation, and Resiliency

The City of Detroit will implement activities that will ensure high quality, durability, energy efficiency, sustainability, and mold resistance. The City will adopt and enforce modern and resilient building codes that mitigate hazard risk from flooding and comply with Green Building standards. All newly constructed buildings must meet all city building codes, standards, and ordinances. All new construction of residential buildings or replacement and/or reconstruction of substantially damaged buildings will incorporate Green Building Standards.

The City of Detroit will construct protective infrastructure as our mitigation strategy. This mitigation strategy will be an estimated cost of \$10 million, benefiting over 200 households. This strategy will remove several homes from the floodplain zone. This allows the neighborhood to be eligible for federal funding and homeowners won't have to purchase flood insurance. During public comment period, residents of the Jefferson- Chalmers neighborhood overwhelmingly opposed this activity. At this time, this activity is being suspended, and further outreach will be conducted a later date to determine the City's mitigation activity.

Broadband Infrastructure in Housing

In the event that the City of Detroit does substantial rehabilitation or new construction of a building with more than four (4) rental units, they will include installation of broadband infrastructure, except when: the location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible, the cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or the structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

The City of Detroit does not plan to do any rehabilitation or construction of buildings with 4 or more units with this funding.

Cost Effectiveness

A demonstrable hardship is a substantial change in an Applicant's situation that prohibits or severely affects their ability to provide a minimal standard of living or the necessities of life including food, housing, clothing, and transportation without causing economic distress well beyond mere inconvenience as shown by objective evidence. The City of Detroit will define "demonstrable hardship" and "not suitable for rehabilitation" as they relate to recovery programs in the policies and procedures associated with the use of the city's CDBG-DR funds as they relate to each program.

The City of Detroit will adopt policies and procedures that communicate how it will analyze the circumstances under which an exception is needed, and the amount of assistance necessary and reasonable.

Duplication of Benefits

The City of Detroit will comply with Section 312 of Stafford Act ensuring that all activities aid a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met. City of Detroit is subject to the requirements of the Federal Register notice(s) explaining the duplication of benefit requirements (84 FR 28836 and 84 FR 28848, published June 20, 2019, or other applicable notices).

City of Detroit
Housing & Revitalization Department
Community Development Block Grant Disaster Recovery Public Hearing

Summary:

The Housing & Revitalization Department (HRD) posted CDBG-DR Action Plan Draft for public comment. All citizens had an opportunity to submit their comments and questions regarding the CDBG-DR Action Plan. Citizens were able to submit comments and questions disasterrecovery@detroitmi.gov.

Question/Comment 1:

While I appreciate the extensive work the city has done on this proposal, I must lodge concerns about some of the provisions and statements included here and with other plans and documents regarding flood, particularly from the canals. The plans often seem to lack the on-the-ground, real work perspective and knowledge of residents who live here. Almost every one of these plans contains a serious error in fact or a proposal that just doesn't make sense. An April 2019 proposal from the Planning Department included a proposal to install "pedestrian bridges" over the canals in multiple locations which would, in essence, prohibit the use of boats by the hundreds of homeowners and boat owners who keep the watercraft on the canals. There was no provision for them to under the low-lying bridges. A similar proposal earlier this year noted that we experienced a massive, live 11 inches, in canal level height in late January or February to booster the argument for closing the canals, but negating to realize that almost every spring (February-March) ice jams on the river cause a temporary rise in the water level or a day or two. It happens almost every year at that time and is, again, temporary. Finally, this proposal stated on Page 5 a notable rise in the river do to the June 25-26 1,000 year rainstorm. In fact, according to data provided by NOAA from their water level monitoring station at the foot of the Ashland canal at the Detroit River, the water level was down almost a foot and a half from the same day in the previous June (2020), well below floor stage and only fluctuated about 4 inches between the highest and lowest levels both days. As someone who lives on the canal and was out and about in the neighborhood and talk to neighbors throughout the day, I and no one else recall seeing any water spilling over from the canals. It just didn't happen, and it wasn't even close to happening.

Response to Question/Comment 1:

During an October 11 meeting with Jefferson Chalmers specific to river flooding and the canals, the majority of residents said no to restricting any use, even if temporary due to river levels, to the canals and the Detroit River. Also, In 2019, the Detroit River overflowed onto properties and into the public sewer system due to high water levels. In 2021, the flooding was due to the June 25-26, 2021 rain event that overwhelmed the existing sewer system. We will make sure that is clearly stated in the Action Plan.

Question/Comment 2:

I understand that there will be a Zoom meeting on November 1, 2022, regarding the Proposal Disaster Recovery Fund, related to the backup sewerage damage on June 25-26, 2021.

My concerns are:

- (1) Will the Disaster Recovery Fund coverage; what cost limit are given for each resident for damages regarding backup flow in a resident's home?
- (2) Will the fund coverage; continue maintenance with the sewerage basin in the neighborhoods, (blocked **inside the basin are growing trees and other rubbish that are blocking the water flow and it's ending up in MY resident**)

I live on a corner resident, the side street including my home has total of 3 sewerage basin, and one front of my home (total of 4) **sewerage basin** that are **NOT maintained at all**. I continue to clean the top of the sewerage basin but its what's inside the basin the blocks the flow of water.

- (3) Will the fund coverage; **cost of infrastructures repairs**, replacements of the neighborhood's sewerage basin, upgrades, water main breaks, pipes, new operational equipment etc.?
- (4) Will the fund coverage; communities in the Detroit area or will majority coverage the Metro Detroit area?

Since, **Great Lakes Water Authority** denied ALL claims because of the report the equipment was operating at its compacity, is an excuse.

Then make suggesting to homeowners to update their properties with gutters that would have the water flow out of the property and keep the basins clean, remove all important items from the basement in hope to prevent backup

flow. (Important items like, washer and dryer, furnace, and hot water heater- who's going to pay for the cost of replacement- and that whether or not homeowner's insurance may or may not apply) No one wants to be responsible for damage caused by an "Act of Nature".

Well, the homeowners did **ALL** that was suggested and there **should not have been** as much of backup flow of water received in my resident basement.

Response to Question/Comment 2:

The current proposed use of CDBG-DR funding is to repair lateral tie-ins, install backflow preventers and address emergency housing needs on a case-by-case basis for income eligible households in the identified targeted neighborhoods. More information on that proposal can be found here: <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>. The assistance for each household is estimated not to exceed \$30,000/home. The funding will only be used in the City of Detroit. Maintenance is not an eligible use of CDBG-DR funding. According to DWSD, clogged basins will cause street flooding, though they do not cause basement backups because they are separate storm lines. DWSD has a budget and crews to clean and inspect basins. Please confirm the address below is your address and I will provide your information to DWSD where you will be added to the list of catch basin inspections and cleaning.

Question/Comment 3:

As a Jefferson Chalmers resident, I think the action plan needs more details for how the plan will help get us away from flooding.

I also think that we need to put into consideration the redesign of our streets to reduce free government-provided storage for personal automobiles to make way for more green stormwater infrastructure. This is critical as the city cannot afford to let the neighborhood continue to flood. Considering the impacts of climate change and the contribution that personal automobiles have to that, it makes sense to redesign our streets for more sustainable forms of transportation.

We also need to support more residents in disconnecting water spouts that lead to sewers, installing rain gardens, and the removal of impervious surfaces like driveways and parking lots with the replacement of something more porous. All of these things help divert water away from the sewers and into the ground which prevents flooding.

Additionally, we need to consider the plans for our neighborhood parks in Jefferson Chalmers and consider designs that help to serve as barriers to high water times for our community. There are spaces which are impervious rock which could help to be a better barrier than they are today.

Response to Question/Comment 3:

The current action plan for housing does not serve the Jefferson Chalmers neighborhood at this time due to federal regulations related to Flood Insurance. However, the city anticipates utilizing non-HUD funds to address homes. The infrastructure project proposed for the neighborhood was suspended due to overwhelming feedback from residents. Through the Basement Backup Protection Program, eligible applicants will have their downspouts disconnected from the public sewer system. Green stormwater infrastructure, beyond rain gardens on side lots where local house runoff can go into, is difficult to be effective in Jefferson Chalmers due to the geography of the neighborhood. For this reason, DWSD and GLWA are looking into a relief sewer for Jefferson Chalmers that provides more capacity during rain events.

Question/Comment 4:

Page 12 "Leading up to the storm, Detroit Water and Sewage Department (DWSD) routinely maintained sewer-catch basin clean out throughout the city."

The Jefferson Chalmers (JC) community saw little to zero routine maintenance. In fact, the JC community still experiences standing water on Philip south of Essex, Lakewood and north of Essex, and on Newport between E. Jefferson and Freud long after a rainstorm or normal rainfall occurs.

The JC community is not in-agreement with the City's representation on this page of the Recovery Action Plan (RAP). HUD auditors, please note.

Page 13 "In addition, much of the surrounding counties drain through the City of Detroit, making Detroit the bottom of the water shed. Approximately 30,000 broken lateral tie ins ..."

The JC community opposes the Great Lakes Water Authority's Regional and the DWSD's local Combined System Overflow (CSO) management because this System favors two counties (Oakland, Macomb) and punishes one (Wayne).

RAP makes clear and obvious these economic disparities. If a residential tie in is severed, how would the line's contents make its way into a basement?

The JC community is not in-agreement with the City's blame placed on residents. The City is not taking honest ownership. HUD auditors, please note.

Page 18 "The City of Detroit is proposing to construct protective infrastructure in the JC neighborhood as the mitigation activity. This activity will reduce the amount of homes in the floodplain zone, prevent future impacts from flooding and ..."

The JC community opposes construction that does not involve removing the current and aged CSO and replacing it with separated sanitary and storm water flow piping into an established Treatment Facility. Also, the JC community opposes closing any of the three canals.

The JC community is not in-agreement with two of the City's RAP documented Mitigation Activities. HUD auditors, please note.

Response to Question/Comment 4:

Thank you for your feedback. Please see the responses to your questions and concerns:

1. DWSD has cleaned and inspected every local public sewer pipe in Jefferson Chalmers, including lining some sections through a \$10 million project. Basins can still clog, especially if leaves, twigs, trash and other debris are not cleaned off the street in front of properties. There is a shared role in making sure the basins stay unclogged (see this video: <https://youtu.be/Nnvw-ewt1kk>).
2. DWSD is collaborating with GLWA to reduce the flow of regional combined sewage into Jefferson Chalmers, including adding backflow preventers to the public sewer pipes and adding larger relief sewer pipes. The 30,000+ broken sewer lateral tie-ins are all in Detroit and attached to homes. With falling sewer lateral pipes, when the residents use their drains and flush their toilets, their sewage will back up into the basement even on dry days. Root balls that come out of these lateral pipes also impact nearby properties because the roots from the private sewer pipe reach into the public sewer and cause blockages.
3. Separating the sewer system on the lower eastside is cost prohibitive and will not resolve the root cause. Adding more capacity is the goal. There is no funding available for separating the sewer system, which in turn, would cause sewer rates to dramatically increase if the cost was not covered by a third-party outside of GLWA and DWSD (i.e., federal government).

Question/Comment 5:

I would like to see this money put towards:

- 1) Back flow preventers for Jefferson Chalmers residents
- 2) A beginning (study?) to solve the deeper infrastructure issues i.e. combined sewer overflow, green solutions like rain gardens and basins (there is a lot of vacant land- this could be done now), to resolve basement flooding from antiquated CSO water sewer system
- 4) STOP allowing Grosse Pointe to discharge sewerage into residential area in our canals!!!!
- 3) Hire consultant and work with the community to get us out of the floodplain WITHOUT closing canals. EVER. This can be done.

Response to Question/Comment 5:

1. CDBG-DR will not be used to install backflow preventers into the Jefferson Chalmers neighborhood due to restrictions related to flood insurance. However, ARPA funding is allocated to serve Jefferson Chalmers for this purpose. You should see more information related to the JC program in the coming months.
2. The City allocated \$1.5MM for planning, and will consider this feedback for the type of studies this funding could be used for to assist with recovery efforts.
3. Grosse Pointe is part of the regional sewer system operated by the Great Lakes Water Authority. We recommend you share that with the GLWA Board during their public meetings (<https://glwater.org>).
4. DWSD has a Stormwater Management Group that is designing more green stormwater infrastructure projects to reduce flooding and the demand on the combined sewer system. Due to topography and the soil base, GSI will not

work in Jefferson Chalmers. We are currently analyzing adding more relief sewers inside the neighborhood. The plan was shared with the Jefferson Chalmers neighborhood during a meeting on November 3.

Question/Comment 6:

I reside in Detroit, MI 48228. Our area was not included in the Detroit Water and Sewerage Department basement backups. Every time it a flood disaster is declared my basement floods also. Why wasn't my area included? Will be able to get some assistance to rectify basement back-up due to floods with the new Disaster Recovery Plan?

Response to Question/Comment 6:

I am sorry to hear about your situation. At this time, the City has chosen to start by serving neighborhoods most impacted by the June 2021 storm (this equates to at least 2 out of every 10 households experiencing flooding in the basement). Those areas can be found in the presentations here: <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>.

Question/Comment 7:

Hello how do we access this grant to help us recover from the damage the flood did to our home in the basement, roof and subsequent damage to areas of the home?

Response to Question/Comment 7:

The City anticipates launching the program in Fall of 2023.

Question/Comment 8:

Thank you for the meeting tonight. I would like to comment on your plans. First, if there is not enough money to meet the projected need, why is the city taking \$50 million of the proposed funds? Those funds could be used to give ALL the residents the basement backup protection, not just the areas that have elected officials in them. Secondly, and this was already mentioned in your comments, you could allocate some land in each neighborhood to capture some of the rain. Oh, here's an idea, use the \$50 million, the city's cut, and update our sewers. Heavy rains are going to continue the question is will we be ready?

Response to Question/Comment 8:

The City reported how much damage from the storm FEMA believed was still unfunded for the State of Michigan versus the amount of funding appropriated by Congress for this program, which resulted in a gap of funds still needed to address all of the unmet needs. What that means is that there was are not enough funds to cover all of the remaining estimated need.

The proposed use of the funds is to provide lateral tie in repairs and backflow preventers to income eligible households in neighborhoods most impacted by the storm. FEMA estimates that there are around 4500 households that still need assistance. There is only funding for a projected 1500-2000 homes. The most impacted areas were chosen based on data demonstrating where the most basement backup claims occurred. While we acknowledge the need for infrastructure projects in the city, unfortunately those projects far exceed the amount of funding from this program and/or would limit the City to only serving a small portion of residents.

Question/Comment 9:

Just learned of the virtual forum relative to this disaster recovery plan.

Just not sure if many folks understand just what these monies can be used for, which in term will not permit the pointed questions needed to be asked.

Response to Question/Comment 9:

I am sorry to hear that you just learned of the public hearing 11/1. There were two other public hearings also held on 10/17 and 10/19. The presentation can be found online at: <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery> and it outlines what the funding can be used for. Recordings of the meetings should be on the same webpage early next week.

Question/Comment 10:

I am a resident of Jefferson Chalmers who was adversely impacted by the heavy rainfall and subsequent flooding. My home has not fully recovered from the flood in 2014. While I am not one of the poorest residents in the City, my resources are limited. In the conclusion, the reports states that the cost of insurance and restoration of homes is considered, but not budgeted. I would like to purchase flood insurance, but have not had the funds to do so.

Suggestions

Offer Insurance At A Bulk Rate

It would be most helpful if the City could arrange a bulk buying program so that residents who do not have a mortgage and don't qualify for low income programs can purchase homeowners and flood insurance at a reduced, affordable amount. If a large number of residents buy together, the insurers get more business and residents get cheaper rates. Really, all residents need the option for more affordable insurance. Insurance in Detroit is too costly! One of my neighbors who is 72 years old and a widow pays nearly \$350 per month in homeowners insurance! She was covered when the flood came, but at a very high cost.

Back Flow Valve Ineffective

Neighbors have told me that the back flow valve did NOT prevent water from coming into their home. Have the challenges that existing residents have with this device been corrected? The City should not dedicate the majority of the budget to a device that does not prevent backups.

I applied for a program to install a backflow valve before hearing they were ineffective. I have not gotten a response about the program.

Home Repair Must Be Part Of Budget

As I mentioned, my home has not fully recovered from the 2014 flood.

Paint is chipping from the walls. This is an old house (built in 1939) so the paint probably has lead. I am afraid to scrape it for fear of disturbing the lead paint. I need a professional to scrape and paint. However, one quote I got for scraping and painting and repairing the plaster is \$6000.

Plaster is deteriorating where flood waters where. The damage to the plaster covered wall is twice as high as the water was. The asbestos covering the pipes is starting to crack in part because of the standing water in the basement during for 5 days after the flood.

The water did not receded. I had to purchase a new sump pump to get the water out.

I could not afford to hire a company to professional clean the basement. Plus the emotional toil of trying to figure out what to do made it difficult to think.

The flood waters and scrubbing of the floor have caused the paint on the floor to peel. I have not been able to afford to have the floor and wall repaired and painted.

Another I got a quote to repair the plaster that was over \$10,000! Well outside of the realm of possibility for my budget. We need:

Affordable contractors

Affordable Homeowner Insurance

Funds for basement restoration and repair

Add Green Infrastructure

Detroit has so much vacant land, why doesn't the plan include bioswales, gullies and other green infrastructure?

Since it is apparent that the climate has changed and flooding is now common, any new development should include green infrastructure. For example: All new parking lots should have green spaces that catch water drained from the parking lot.

Response to Question/Comment 10:

1. Regarding Flood Insurance, while HUD Disaster Recovery funding used for housing may cover the costs of flood insurance, costs associated with coverage would likely only allow funds to be used to cover no more than a one year, leaving many residents without coverage thereafter and putting them at potential risk to be unable to receive additional federal resources should another disaster occur. In lieu of using CDBG-DR funding in Jefferson Chalmers, the city has proposed to use non-HUD funding to alleviate the need for the flood insurance.

2. Backwater valves that are properly maintained and activated during a rain event worked in Jefferson Chalmers in June 2021. Residents need to make sure there is no paper or other items making the valve stay open, and not use their drains and toilets during the rain event so the valve flap stays closed to block a backup. We know of several homes that had the valve and did not have basement backup. The homeowner also needs to ensure their sewer lateral service line from the house connecting to the city sewer is intact and not cracked, falling off, clogged, or collapsing.
3. Housing is the only activity being presented as a proposed activity at this time. While we understand there may be some unmet needs related to the impact of the 2014 flooding, the CDBG-DR funding can only be used for damages caused by the 2021 flooding. At this time, the city is proposing to repair lateral tie-ins and install backwater valves in homes impacted. In addition, on a case-by-case basis, the city may address emergency situations where a homeowner may still need a furnace or hot water heater for example from the 2021 flooding.
4. Green stormwater infrastructure, beyond rain gardens on side lots where local house runoff can go into, is difficult to be effective in Jefferson Chalmers due to the geography of the neighborhood. For this reason, DWSD and GLWA are looking into a relief sewer for Jefferson Chalmers that provides more capacity during rain events. There is a city ordinance that requires developers of 0.5 acres or more to now manage stormwater onsite through green stormwater infrastructure. They are required to submit their plans to DWSD. In addition, since 2016 DWSD has spent more than \$30 million on green stormwater infrastructure including bioretention gardens in areas where it can reduce the flow to the combined sewer system. DWSD has 16 existing projects and is building a new \$30 million project in Rouge Park to remove 176 million gallons of stormwater from the sewer system annually, creating more capacity.

Question/Comment 11:

Dear Detroit Housing and Revitalization Department,

As a resident, I am emailing my feedback suggestions on the City's Action Plan, which proposes how to use funds to recover and protect homes from flooding and improve flood protection infrastructure for especially, our Kraniz Woods community. As a resident in the City of Detroit, I was affected greatly by the disaster of June 2021. My family members were also greatly affected. We all live in the same neighborhood. We have a lot of houses on the same street or around the block of each other or within blocks of each other. This is a community that I have lived in growing up, as a child and I have never seen the damage from this storm as I did in June 2021, ever in life. We have never had damage to our homes and basements as it was in 2021. It was a great loss in so many ways. The biggest problem I see is that, as a homeowner, the water damage that was caused in the basements with the toxic sewage water backup that flowed into our basements and the personal damage, was massive. Prevention of this is very important to me as a resident. Please consider the following suggestions I believe are very important to help homeowners especially in the Kraniz Woods area to protect the safety and prevention of backup water problems in the home basements of our community:

Housing Recovery & Protection Program Ideas:

Please consider in the Recovery Program Budget of \$43,211,450 the following:

- There should be a way that the water can be stopped from entering into the basement of the homes by using and installing a "Flap System" to prevent the water from coming into the basement. This should be installed into every home where there was a water sewage problem in the basement with back up. This prevents the water from entering into the basement.
- The alley sewage problem needs to be repaired and updated and replaced to prevent toxic backup into our basements. It is a very old system that needs to be updated in the Kraniz Woods community, which is one of the oldest communities in the city of Detroit since the 1920's. It has never been updated or repaired since 1955 when my parents first moved into the neighborhood over 67 years ago.
- The systems from the alley that leads into each home from the alley needs to be replaced for prevention of toxic sewage backup flowing into our home basement that was damaged.
- Any large trees that have been around for over 60 years or more, where roots may be blocking any alley roots or areas, in the system underground should be dug up and inspected to make sure all systems are functioning properly and replaced. The trees should be cut down that could be causing sewage problems. The sewage systems should also be cleared of any blockage of any tree roots.
- Any street outlets to the sewage system in front of the houses, in the alleys or on the main streets and all major side streets of the house or in the community should be cleaned and/or replaced to clear all systems.

- Compensation should be allowed for furnaces, hot water tanks, washing machines and dryers, which were damaged.
- Any drywall or other structures in the basement should be compensated
- Any other personal items damaged should be compensated also.
- There should be an allowance for any repairs in the basement caused by the disaster.

Thank you for your time and consideration.,

Response to Question/Comment 11:

Pending HUD approval, we will offer the sewer lateral service line replacement to low-income eligible homeowners in targeted neighborhoods. That plan can be found here: <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>. We understand that homeowners need assistance in repairing/replacing their sewer pipes from the house that connects to the DWSD public sewer in the alley. These “lateral” service lines are private responsibility to maintain. We are also seeking additional, separate federal funding to expand the Basement Backup Protection Program to other neighborhoods (the flap you mention). Additionally, DWSD has a robust Capital Improvement Program that is going neighborhood-by-neighborhood to assess and repair/replace the public water mains and sewer collection pipes. Information about what areas they are working in now is at <https://detroitmi.gov/waterupgrades> and <https://detroitmi.gov/sewerupgrades>.

Question/Comment 12:

I would like to know what's offered for individuals like myself who lost personal belongings and had flooding issues that caused damage to the home and structure at no fault of our own. Individuals who do not meet the income guidelines, but we were just as much affected by the flooding. Individuals that FEMA, the City, and Insurance offered little or no assistance to assist with the repairs. Something needs to be done for those individuals who are just outside the guidelines to help them repair and restore.

We may not live in the areas outlined in the current plan.

Response to Question/Comment 12:

Thank you for your feedback. Unfortunately, the HUD Disaster Recovery funding was designed to assist with low-to moderate income households. The City is considering using non-HUD funding to assist households that are in the most impacted neighborhoods and cannot qualify for the HUD funding. More information on that program will be released at a later date.

Question/Comment 13:

Good afternoon, could you provide a number for whoever is in charge of removing the sandbags on Ashland Street where the tiger dams were installed?

Response to Question/Comment 13:

Please contact Crystal Perkins at the City of Detroit General Services Department

Question/Comment 14:

I am contacting you regarding information for our clients to apply for the disaster recovery assistance. In the meeting, it was stated that there was a HUD link for applications. Also, what type of assistance is there for renters that were impacted from the flood?

Response to Question/Comment 14:

The HUD funding is not yet available. The City is completing its Action Planning process so that it may be able to access the funding. Renters are being considered as potential applicants for the proposed Housing Recovery activity. We are currently in the 30-day comment period to receive resident feedback on the proposed activities. That is what the public hearings were for. You may access the information related to the Action Plan here:

<https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>

Question/Comment 15:

My comment is that a lot of times people need the help and is denied. I feel like the people in charge make sure their family, friends and neighbors are taken care of and the program funds are distributed wrongly. I live on Chandler park drive off moross and we had major rain damage just like jefferson and chalmers and everywhere else, and you know what went on Fema treated Detroit like dirt denied and under paid claims to people in dire need. How do you secure this funding being given to people in need who truly can't afford to do it on their own and just being handed to people who they feel they want to give it to. You need people in areas where they dont live to decide who gets the help because they are neutral and have No dog in the race.

Response to Question/Comment 15:

Hello and thank you for your feedback. The city is proposing using this funding for the neighborhoods most impacted by the flooding, which is not limited to the Jefferson Chalmers neighborhood. Please see the maps in the presentation here: <https://detroitmi.gov/sites/detroitmi.localhost/files/2022-09/CDBG%20DR%20Public%20Outreach%20DRAFT%20%281%29.pdf>. Funds are being proposed for low-to moderate income households that are at or below 80% of the Area Median Income.

Question/Comment 16:

I need help with recovery from flood For my home its been very hard to maintain after the flooding of my home please help me save my home thanks.

Response to Question/Comment 16:

I am very sorry to hear about your situation. The CDBG-DR program has not officially launched. The City is currently applying for the funds from HUD and is looking for feedback from residents on how we would like to use those funds. You can find information for that here: <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>. We will notify the community when the program has officially launched, which is anticipated sometime in late 2023. I sent a referral to our Home Repair team to see if there are other resources available to assist you in the meantime. You should receive an email or call from them in the next few days.

Question/Comment 17:

As a result of the 2021 flood damage , all affected households regardless of income should receive back flow valves and sump pumps.

Response to Question/Comment 17:

CDBG-DR funding from the U.S. Department of Housing and Urban Development is used to benefit of households at or below 80% of the Area Median Income. However, the City is proposing to use other sources of funding to assist households who may not meet these criteria. More guidance on resources for household's ineligible for CDBG-DR in the most impacted neighborhoods will be provided when the program launches and is addressed in the presentation found here: <https://detroitmi.gov/sites/detroitmi.localhost/files/202209/CDBG%20DR%20Public%20Outreach%20DRAFT%20%281%29.pdf> .

Question/Comment 18:

As it relates to the City's HUD CDBG-Disaster Recovery draft action plan I'd like to know:

1. Will there be an auditor to ensure funds allocated for administrative or residents will be accounted for and accurately spent?
 2. Will residents that submitted claims to the Water Authority and were denied be compensated first?
 3. How will funding be allocated to those impacted?
 4. What is the tentative timeframe for compensation?
 5. What is the estimated amount for resident households?
 6. Does this grant have income restrictions because every income level was impacted by this disaster?
- These are all the questions I have regarding the grant. I thank you in advance for your consideration of my questions and look forward to your response.

Response to Question/Comment 18:

1. Will there be an auditor to ensure funds allocated for administrative or residents will be accounted for and accurately spent? – **Yes, CDBG-DR requires grantees to have an auditor. This person has not yet been identified, as we will not begin program design until our Action Plan is accepted by HUD, which could take until January 2023.**

2. Will residents that submitted claims to the Water Authority and were denied be compensated first? – **This question can be answered once the program design has begun, and this question will be collected as feedback for the activities. At this time the city is proposing activities in the most impacted neighborhoods for people at or below 80% of the Area Median Income.**

3. How will funding be allocated to those impacted? – **The City is proposing that the funding be used in the neighborhoods who were most impacted by the flooding in June 2021.**

4. What is the tentative timeframe for compensation? – **HUD regulations do not allow funding to be given directly to beneficiaries.**

5. What is the estimated amount for resident households? - **HUD regulations do not allow funding to be given directly to beneficiaries. However, as it relates to the cost of the proposed activities, it is estimated that up to \$30,000 will be needed per household served with CDBG-DR for Housing and the cost of the protective infrastructure would equate to \$4,286 per household based on service area.**

6. Does this grant have income restrictions because every income level was impacted by this disaster? – **Yes, the proposed activities are restricted to households at or below 80% of the Area Median Income or Areas where at least 51% of the households are at or below 80% of the Area Median Income.**

You may find additional information about the Action Plan here: <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>

Question/Comment 19:

We hope that this time we will get **real** assistance and not just lip service. Our circumstances are dire. **WE NEED ASSISTANCE NOW!!!**

My family were the victims of the June 2021 flooding incident in Detroit. Sadly, our situation has not been resolved. Time has passed and we have been left behind. I am astounded at the lack of empathy regarding our losses and the epic failure of the system.

We were victims impacted by the flooding of June 2021. This disaster left us in dire circumstances. The flood waters severely damaged all essential operating systems within our home rendering them nonfunctional.

From June to December 2021, we remained in the home. There were so many mishaps with the procedure in regards to the flood damage to our home and how the documentation was handled that the process took 6 months to complete.

FEMA declared our home to be unsafe and uninhabitable and strongly advised vacating the premises. Therefore; from December 2021-April 2022, my sister and I were displaced and on the verge of homelessness.

For our safety and well-being I had sought all forms of assistance from the City of Detroit, County of Wayne and State of Michigan whether local, state or federal. To date we have received No real tangible beneficial assistance.

Due to urgent need we are presently seeking assistance in restoring our home property back to the standard of healthy and safe. My family has not received any further assistance from FEMA (Dec. 2021) and we are still without a safe and habitable home. We remain displaced and on the verge of homelessness.

Our home is still without any of the critical essential operating systems. They are all still nonfunctional. So the home remains without heat, electricity and water. Not to mention excessive damage caused by the aftermath of the flooding and the non assistance with critical repairs from the city, county, state or FEMA.

We remained out of our home until April 2022 and as a result our home was vandalized and burglarized on several occasions. Our home is partially habitable but still unsafe.

Due to urgent need we are presently seeking a housing solution that fit the standard of healthy and safe.

This matter should not have taken more than a year to be address by the system.

Please help to expedite this matter. We have urgent need of a solution to our displacement. I can be contacted at

Response to Question/Comment 19:

I appreciate your feedback and I am sorry to hear about your situation. The Disaster Recovery Program has not yet launched, as we are applying for these funds currently so that we may serve residents. We are requesting feedback from residents on the planned use of the money, that information can be found here: <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>

However, I have referred your information to our Detroit Code Blue Emergency Housing Team, and someone should be reaching out to you to see if they can assist.

Question/Comment 20:

Please see attached documents to submit as feedback on the proposed disaster recovery action plan. There is a letter on behalf of Eastside Community Network and the Eastside Climate Action Coalition, which we convene. There is also our

list of proposed policy and program solutions to flooding in our community, for your reference. Please let me know if you have any questions or concerns. Thank you for the opportunity to provide feedback.

Response to Question/Comment 20:

Thank you for your feedback. Where the suggested advocacy points overlap with the CDBG-DR program, we will take them into consideration throughout the program design phase and as projects are identified for the unallocated funds. The broader strategy points I will also share with our partners at DWSD.

A few responses to suggestions in the letter:

1. For the lateral tie-in program ,the goal is to have the backflow preventers installed outside the home while repairing/replacing the lines. This program is an extension of the existing Basement Backup-Protection Program.
2. We do understand the need for other flood mitigation efforts; however, we have limited resources from the CDBG-DR funding. We will consider the suggestions of elevating appliances and installing tankless water heaters when addressing emergency housing repairs, as we build out the program design.
3. CDBG-DR housing recovery and protection can be used for unmet emergency needs and disaster recovery including private property. The funds for that must be available citywide to those most impacted by the flooding. Which is
4. why sewer lateral service lines and backwater valve installations were chosen as those are common assets for every residential house and can help prevent future backups and flooding. Also, the funding recommended for Jefferson Chalmers was mitigation set-aside, and the purpose of that funding is to prevent future flooding. Seawall repair at existing elevation does not satisfy FEMA's requirements to remove the neighborhood from the FIRM 100-year flood plain, therefore it would not be an appropriate use of DR funds.
5. The activity for the Jefferson Chalmers neighborhood was listed as protective infrastructure because conversations with the neighborhood on specifics of the infrastructure project had not been agreed upon. Plans related to the unallocated \$10MM have not yet been identified and will be shared with the public at a later date when identified.
6. With limited resources, the City chose to begin by serving neighborhoods where two of out of every ten households were impacted by the flooding in the basement, and not only from the 2021 flooding but also from backups occurred since 2016. This data was provided by DWSD claims. The City is also providing non-HUD funding to assist with residents in the Jefferson Chalmers floodplain.
7. The federal register notice dictates when the city must submit its Action Plan for CDBG-DR funding, so the City worked diligently to meet those timelines. The City held a 30-day public comment period and notified residents and community groups of those hearings and presented the proposed options during 3 public hearings (exceeding the HUD requirement of 1 public hearing and the City's Community Outreach Ordinance requiring 2) in hopes to receive feedback. In addition, non-profit partners like ECN were notified 10/4/22 via email about the comment period and the public hearings scheduled for 10/17 and 10/19 from HRD staff and residents were notified via the following platforms:
 - **Public Notice posted 10/6/2022** via the Housing and Revitalization Department Facebook, Twitter, and Instagram pages
 - **Public Notice posted 10/6/2022** on City of Detroit Public Access Channel 10
 - **Public Notice Posted (10/6/2022)** via the City of Detroit Facebook page
 - **Public Notice Posted (10/6/2022)** to the City of Detroit Website Events Calendar and PDD website
 - **Public Notice sent 10/7/2022** to the District 4 Community Advisory Council

In addition, all materials and resources were provided on the CDBG-DR webpage for public access found here: <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>

The City plans to reach out in early 2023 to non-profit partners to talk more about program marketing and outreach, HRD will include ECN as part of that conversation.

DATA SOURCE

- HUD Federal Register 31636
- [US](#) 2021 Census Bureau
- Detroit Office of Homeland Security & Emergency Management: *City of Detroit Hazard Mitigation Plan*. January 2022. https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf
- <https://www.washingtonpost.com/news/wonk/wp/2015/09/21/the-most-popular-type-of-home-in-every-major-american-city-charted/>
- November 23, 2021. Detroit homes are being overwhelmed by flooding — and it's not just water coming in. *NPR*. <https://www.npr.org/2021/11/23/1037540261/detroit-homes-are-being-overwhelmed-by-flooding-and-its-not-just-water-coming-in>

Important Definitions and Terms

Each grantee will want to edit these definitions and terms to become applicable to them. The examples below are common CDBG-DR terms.

Important Definitions and Terms.

AMI: Area Median Income

CBDO: Community Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant- Disaster Recovery

CFR: Code of Federal Regulations

CO: Certifying Officer

CP: Participation

DOB: Duplication of Benefits

DRGR: Disaster Recovery and Grant Reporting System

FEMA: Federal Emergency Management Agency

HCD Act: Housing and Community Development Act of 1974, as amended

HMGP: Hazard Mitigation Grant Program

IA: (FEMA) Individual Assistance

LIHTC: Low-Income Housing Tax Credit

LMI: Low and moderate-income

NFIP: National Flood Insurance Program

PA: (FEMA) Public Assistance

RE: Responsible Entity

RFP: Request for Proposals

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

UGLG: Unit of general local government

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.


Signature of Authorized Official

11/14/22
Date

Mayor
Title

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official



Date



Title

CERTIFICATIONS – CDBG-Disaster Recovery

In accordance with the applicable statutes and the regulations governing the Disaster Recovery Action Plan, the jurisdiction certifies that:

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- d. The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- e. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements.
- f. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.
- g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- h. State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG-entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.
- i. The grantee certifies that it is complying with each of the following criteria:

- (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 - (2) With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 - (3) The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
 - (4) The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- j. State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
- k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing:
- (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- l. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.I. of the Consolidated Notice and

the grantee's implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.

- n. The grantee certifies that it will not use CDBG-DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.


Signature of Authorized Official

11/14/2022
Date

Mayor
Title

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

11/14/2022

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

CITY OF DETROIT, HOUSING AND REVITALIZATION DEPARTMENT

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

38-6004-606

*** c. UEI:**

GS94M2VMNMJ3

d. Address:

*** Street1:**

2 WOODWARD AVE, SUITE 908

Street2:

*** City:**

DETROIT

County/Parish:

*** State:**

MI: Michigan

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

48226-3413

e. Organizational Unit:

Department Name:

HOUSING & REVITALIZATION

Division Name:

ADMINISTRATION & FINANCE

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

*** First Name:**

WARREN

Middle Name:

*** Last Name:**

DUNCAN

Suffix:

Title:

DIRECTOR OF REPORTING & COMPLIANCE

Organizational Affiliation:

*** Telephone Number:**

313-224-0315

Fax Number:

*** Email:**

wduncan@detroitmi.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT (HUD)

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY (CDBG-DR)

* 12. Funding Opportunity Number:

B-21-MF-26-0002

* Title:

COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

The Community Development Block Grant Disaster Recovery funding to support long-term recovery efforts following storm events from the 2021 Presidential Major Disaster Declaration.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="57,591,000.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="57,591,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:Prefix: * First Name: Middle Name: * Last Name: Suffix: * Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:



* Date Signed:

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


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

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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION CITY OF DETROIT	DATE SUBMITTED 1/11/22

ASSURANCES - CONSTRUCTION PROGRAMS

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

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



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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	
APPLICANT ORGANIZATION	DATE SUBMITTED
CITY OF DETROIT	11/14/22