

**DRAFT**



## COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) APPLICATION

**SUBMISSION DEADLINE IS AT 11:59:59 PM EST 120 DAYS AFTER THE DESIGNATION MEMO IS FULLY EXECUTED.**

Applicants must complete the CDBG Application and the appropriate activity specific supplements in their entirety and submit them with the required attachments.

Please review the application to ensure that all fields of information, checkboxes and additional documents requested are addressed prior to submission. When answering the questions, please label all subfactors within the narrative, i.e., a), b), c), d).

The **identified contact person must be an employee of the applicant** (UGLG or Land Bank). Consultants or contractors may neither serve as the primary contact nor submit the application on the applicant’s behalf.

A	APPLICANT INFORMATION	
1	APPLICANT NAME	Brown City
2	ADDRESS, CITY, STATE, ZIP	4205 Main Street, P.O. Box 99, Brown City, Michigan 48416
3	FEDERAL ID #	38-6007571
4	UNIQUE ENTITY IDENTIFIER (UEI) #	M4AEGT8NJ9M5
5	MSHDA ORG #	10704
6	FISCAL YEAR END (mm/dd)	03/31
7	UGLG TYPE/APPLICANT TYPE	<input checked="" type="checkbox"/> Unit of Government <input type="checkbox"/> Land Bank
8	UGLG/APPLICANT CONTACT NAME	Kyle Harris
9	APPLICANT CONTACT TITLE	City Manager
10	APPLICANT CONTACT EMAIL	Kharris@cityofbrowncity.net
11	APPLICANT CONTACT PHONE	(810)346-2325

B	REGIONAL HOUSING
1	Check the Housing Partnership Region your project is located in:  <input type="checkbox"/> <b>A. Western Upper Peninsula</b> - Baraga, Gogebic, Houghton, Iron, Keweenaw, Ontonagon <input type="checkbox"/> <b>B. Central Upper Peninsula</b> - Alger, Delta, Dickinson, Marquette, Menominee, Schoolcraft <input type="checkbox"/> <b>C. Eastern Upper Peninsula</b> - Chippewa, Luce, Mackinaw <input type="checkbox"/> <b>D. Northwest</b> - Antrim, Benzie, Charlevoix, Emmet, Grand Traverse, Kalkaska, Leelanau, Manistee, Missaukee, Wexford <input type="checkbox"/> <b>E. Northeast</b> - Alcona, Alpena, Cheboygan, Crawford, Iosco, Montmorency, Ogemaw, Oscoda, Otsego, Presque Isle, Roscommon <input type="checkbox"/> <b>F. West Michigan</b> - Allegan, Barry, Ionia, Kent, Lake, Mason, Mecosta, Montcalm, Newaygo, Muskegon, Oceana, Osceola, Ottawa <input type="checkbox"/> <b>G. East Central Michigan</b> - Arenac, Bay, Clare, Gladwin, Gratiot, Isabella, Midland, Saginaw <input checked="" type="checkbox"/> <b>H. East Michigan</b> - Genesee, Huron, Lapeer, Sanilac, Shiawassee, St. Clair, Tuscola <input type="checkbox"/> <b>I. South Central</b> - Clinton, Eaton, Ingham

	<input type="checkbox"/> <b>J. Southwest</b> - Berrien, Branch, Calhoun, Cass, Kalamazoo, St. Joseph, Van Buren <input type="checkbox"/> <b>K. Southeast</b> - Hillsdale, Jackson, Lenawee, Livingston, Monroe, Washtenaw
2	<p>Within which County is the project located?</p> <p><b>Sanilac</b></p>
3	<p>How does your project fit with the Regional Housing Plan goals? Indicate the Goal number (Regional Housing Plans can be accessed on the MSHDA website: <a href="#">Statewide Housing Plan.</a>)</p> <p><i>Please navigate to the appropriate Regional Housing Plan under "RHP Documents" for specific goals identified by the local region in which the applicant is located.</i></p> <p><b>Region H study indicates:</b>  <b>goal 3.2 -increase access to stable and affordable quality housing options for households with extremely low incomes.</b></p> <p><b>The City's infrastructure investments will enable the creation of new residential units, with at least 51% designated for low- to moderate-income households, further expanding access to affordable housing.</b></p> <p><b>Goal 4.1 -Increase the supply of the full spectrum of housing that is affordable and attainable to Michigan residents.</b></p> <p><b>The Brown City infrastructure project expands the City's housing options with new units reserved for low- to moderate-income households, while also supporting future growth.</b></p>

<b>C</b>	<p><b>COMMUNITY DEVELOPMENT NARRATIVE</b></p> <p>Title I of the Federal Housing and Community Development Act of 1974, as amended, the applicant applying for funds to provide a brief narrative on how the proposed project aligns with or impacts their locally adopted plans.</p> <p>To satisfy this requirement, the applicant must complete the questions in this section. Applicants may reference a locally adopted plan, such as a Master Plan or Community Improvement Plan; however, all questions must be answered. If the applicant's locally adopted plan(s) do not specifically address the questions provided, supplemental information should be included to demonstrate how the proposed project fulfills the objectives of an existing plan.</p>
1	<p><b>Community Development and Housing Needs Assessment</b></p> <p>Provide an assessment of the community development and housing needs within the applicant's jurisdiction, including the specific needs of low- and moderate-income residents. The assessment must address both <b>community development and housing needs</b>, regardless of the funding category under which assistance is being requested.</p> <p><b>Brown City and the surrounding Sanilac County region face persistent housing and community development challenges that disproportionately impact low- and moderate-income (LMI) residents. HUD LMISD data indicates that 49.10% of Brown City residents qualify as LMI, demonstrating substantial income-qualified need within the applicant's jurisdiction.</b></p> <p><b>Financial vulnerability extends beyond poverty measures. In Sanilac County, 27% of households are classified as ALICE (Asset Limited, Income Constrained, Employed) and an additional 12% of households</b></p>

	<p>live in poverty, meaning many households struggle to afford basic necessities including housing, utilities, transportation, and health care.</p> <p>Housing supply does not align with current demand. Nearly half of renter households are cost-burdened, and much of the existing housing stock is aging and in need of reinvestment. Seniors and workforce households are particularly impacted, with a growing share of older adults living on fixed incomes and limited attainable housing options available.</p> <p>Community development needs are directly tied to housing constraints. Aging infrastructure—including water, sewer, and roadway systems—limits the community’s ability to support housing growth, address public health and safety needs, and stabilize neighborhoods. Strategic infrastructure improvements are necessary to unlock housing production capacity and strengthen long-term community viability.</p> <p>Overall, Brown City’s documented LMI rate, combined with countywide indicators of financial hardship and housing cost burden, demonstrates a clear need for coordinated housing and community development investment to improve housing stability, support vulnerable households, and maintain local economic resilience.</p>
2	<p><b>Planned Short-Term Activities (1–2 Years)</b></p> <p>Summarize planned short-term activities (lasting one to two years) that will address the identified <b>community development and housing</b> needs within the applicant’s jurisdiction. Activities should tie in with the proposed activities and address eligible CDBG activities.</p> <p>Over the next one to two years, Brown City plans to implement targeted infrastructure improvements to address documented housing and community development needs, particularly those impacting low- and moderate-income residents. The primary short-term activity will include the construction and extension of sanitary sewer lines, stormwater drainage improvements, and associated roadway rehabilitation within the Maple Valley Estates subdivision area.</p> <p>These improvements will replace aging infrastructure, improve system reliability, and increase development capacity necessary to support new single-family housing units. By upgrading public water and sewer infrastructure, the City will remove barriers to housing production and enable the development of attainable units that serve workforce and income-qualified households.</p> <p>In addition to direct infrastructure improvements, the City will coordinate permitting, environmental review compliance, and construction oversight to ensure timely project delivery and adherence to federal requirements. These activities align with eligible CDBG public infrastructure improvements and directly support long-term housing stabilization, neighborhood revitalization, and public health and safety.</p> <p>Collectively, these short-term investments will strengthen the community’s infrastructure foundation, expand housing opportunity, and create conditions necessary for sustainable residential growth within Brown City.</p>
3	<p><b>Planned Long-Term Activities (2+ Years)</b></p> <p>Provide a summary of planned long-term activities (lasting two years or more) designed to address the identified <b>community development and housing</b> needs within the applicant’s jurisdiction. Activities should tie in with the proposed activities and address eligible CDBG activities.</p> <p>Over the next several years, Brown City intends to build upon the proposed CDBG-funded infrastructure improvements to support sustained residential growth and neighborhood stabilization. Long-term activities will focus on continued modernization of water, sewer, stormwater, and roadway systems in targeted residential growth areas to ensure adequate capacity for future housing development and public health protection.</p> <p>The City plans to support additional phases of residential build-out within the Maple Valley Estates area and other infill-ready locations, leveraging upgraded infrastructure to encourage attainable single-family housing development. Future infrastructure investments may include system extensions, utility</p>

	<p>replacements, and roadway improvements that qualify as eligible CDBG public facilities activities and address aging infrastructure needs.</p> <p>In addition to physical infrastructure improvements, the City will pursue housing stabilization efforts, including rehabilitation partnerships, code compliance initiatives, and coordination with regional housing organizations to address aging housing stock and improve overall housing quality for low- and moderate-income residents.</p> <p>Collectively, these long-term efforts are designed to align infrastructure capacity with housing demand, expand attainable housing opportunities, improve neighborhood conditions, and strengthen Brown City’s economic resilience. The proposed CDBG activities serve as the foundational step in a multi-year strategy to modernize infrastructure, support residential investment, and address the documented needs of income-constrained households within the community.</p>
4	<p><b>Impact of the Proposed CDBG Activities</b></p> <p>Based on the identified needs, describe the anticipated impact of the proposed CDBG activities. Explain how activities complement the short-term and long-term activities outlined in the previous sections and contribute to the overall development goals of the applicant.</p> <p><b>The proposed CDBG-funded infrastructure improvements directly address documented housing and community development needs identified within Brown City and align with the priorities outlined in the City’s Draft Master Plan (2026). The Master Plan emphasizes the need to modernize aging infrastructure, support residential infill and subdivision development, and expand housing opportunities that serve a range of income levels. The proposed sanitary sewer, stormwater, and roadway improvements in the Maple Valley Estates area are consistent with these identified goals.</b></p> <p>By upgrading and extending critical public infrastructure, the City will remove development barriers that currently limit housing production. These improvements enable the construction of new single-family homes, expanding attainable housing opportunities for low- and moderate-income households while stabilizing existing neighborhoods. The project directly complements short-term housing development activities and supports long-term land use goals focused on managed residential growth and infrastructure readiness.</p> <p>In the broader context, the CDBG investment strengthens public health and safety, increases service reliability, and enhances neighborhood functionality. These improvements position Brown City to attract and retain workforce families, support aging residents seeking stable housing options, and encourage reinvestment in surrounding residential areas.</p> <p>Overall, the proposed CDBG activities serve as the foundational infrastructure component necessary to achieve the City’s long-term development vision—pairing housing growth with sustainable public infrastructure improvements to support economic resilience and community stability.</p>
5	<p><b>Plan for Minimizing and Addressing Displacement</b></p> <p>Describe the strategy for minimizing displacement caused by grant-assisted activities and the approach for assisting individuals who are actually displaced. Reference your locally adopted Residential Anti-Displacement Plan as applicable or develop a new Plan.</p> <p>Some proposed activities and/or identified locations may minimize the potential for displacement. This may be noted. In addition, please provide a contingency plan should an activity trigger a temporary relocation. <i>If displacement occurs, the applicant will comply with URA and Section 104(d) requirements.</i></p> <p><b>The proposed infrastructure project in the City of Brown City is not expected to result in any displacement. While there are some existing homes located in the surrounding project area, all planned infrastructure improvements will occur within the public right-of-way or on vacant land owned or controlled by the City or its partners. No occupied residential or commercial structures will be demolished, and no residents or businesses will be required to relocate as a</b></p>

result of the project. As such, there is no anticipated displacement of persons, households, or businesses associated with the use of CDBG funds.

The City will take all reasonable steps to minimize disruption to nearby residents during construction, including maintaining access to properties and coordinating construction schedules to reduce impacts. In the unlikely event that temporary relocation is required due to unforeseen circumstances, the City will implement appropriate measures to ensure affected individuals are assisted in accordance with applicable regulations.

If conditions were to change and displacement becomes necessary, the City will adopt and implement a Residential Anti-Displacement and Relocation Assistance Plan in full compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) requirements, ensuring that all eligible persons receive appropriate notices, advisory services, and relocation assistance.

D	PROJECT MANAGEMENT OVERVIEW
1	<p>Activity Type(s): <b>Check all that apply</b></p> <p><input type="checkbox"/> Homeowner Rehabilitation      <input type="checkbox"/> Manufactured Housing</p> <p><input checked="" type="checkbox"/> Housing Infrastructure      <input type="checkbox"/> Reconstruction</p> <p><input type="checkbox"/> Unoccupied Rental Rehabilitation</p> <p>A corresponding <b>Application Supplement must be attached for each selected activity</b>, detailing specific implementation strategies.</p>
2	<p><b>Administrative Services</b> - Please note, as the Grantee, the applicant will be responsible for grant oversight,.</p> <p>Select one:</p> <p><input type="checkbox"/> <b>Applicant Staff Only</b> will administer the program.</p> <p><input checked="" type="checkbox"/> <b>Applicant Staff + Third-Party Administrator (TPA)</b> will administer the program with applicant oversight.</p> <p><i>If using a TPA, select how they will be paid:</i></p> <p><input type="checkbox"/> <b>TPA Paid with CDBG Funds</b> – You must follow federal procurement regulations. Do not sign a contract or incur costs until you receive written approval from MSHDA.</p> <p><input type="checkbox"/> <b>TPA Paid with Non-CDBG Funds</b> - If known, list the name of the third party: _____</p>
3	<p><b>Procurement of Third-party Administrator (TPA)</b></p> <p>Select one:</p> <p><input checked="" type="checkbox"/> Applicable      <input type="checkbox"/> Not Applicable</p> <p>If applicable, explain the process to be used for procuring the third-party administrator.</p> <p><b>The City of Brown City will procure a qualified Third-Party Administrator (TPA) to assist with management of the proposed CDBG-funded infrastructure project. Procurement will be conducted in full compliance with:</b></p> <ul style="list-style-type: none"> <li>• The City’s adopted procurement policy;</li> <li>• MSHDA’s CDBG Policy Manual, including Chapters 11 and 13; and</li> <li>• All applicable federal regulations under 2 CFR Part 200.</li> </ul>

	<p>The City will structure its procurement process as follows:</p> <p><b>1. Public Solicitation</b> Administrative services will be publicly solicited for a minimum of 14 days. Notices will be posted on the City’s website and distributed through appropriate regional and professional networks to ensure broad and open competition.</p> <p><b>2. RFP/RFQ Requirements</b> The solicitation will clearly define the scope of work, compliance and reporting expectations, required qualifications, and evaluation criteria consistent with MSHDA CDBG requirements. The City will seek a minimum of two proposals. If cost differences exceed 25%, a third proposal or documented cost reasonableness review will be conducted.</p> <p><b>3. Fair and Open Competition</b> Small purchase procedures will be utilized for contracts under \$250,000, and competitive proposal procedures will be used for contracts exceeding that threshold. Awards will be made on a best-value basis, considering cost, experience with CDBG and federal compliance, technical capacity, and prior performance.</p> <p><b>4. Compliance with Federal Standards</b> The executed contract will include all required federal provisions, including Equal Opportunity requirements, Section 3, Davis-Bacon (if applicable), Copeland Anti-Kickback Act, and applicable environmental and labor standards.</p> <p><b>5. Contract Award and Oversight</b> The selected TPA contract will be formally approved by the City Council. A written agreement and Notice to Proceed will be issued, followed by ongoing oversight including regular progress reviews, invoice verification, documentation of compliance activities, and formal closeout procedures. This process will ensure Brown City secures qualified administrative support while maintaining full compliance with CDBG and federal requirements, ensuring transparency, accountability, and responsible stewardship of public funds.</p>
4	<p><b>Activity Oversight &amp; Administration</b> Describe how the applicant will provide oversight across all selected activities, ensuring compliance with program requirements. Use <b>Form 13-A “Grant Management Plan”</b> from Chapter 13 of the <a href="#">MSHDA CDBG Policy Manual</a> as a guide to inform the requested narrative. Please address the following items in the narrative in the response box directly below.</p> <p>Include:</p> <ul style="list-style-type: none"> <li>a) The structure for managing program administration and oversight.</li> <li>b) Roles and responsibilities of staff, contractors, or agencies in ensuring successful implementation.</li> <li>c) How the applicant will manage key regulatory requirements including Environmental Review.</li> <li>d) Strategies for monitoring activities and addressing compliance issues.</li> </ul> <p><b>Brown City will implement a structured grant management framework to ensure full compliance with all CDBG program requirements and successful delivery of proposed infrastructure activities.</b></p> <p><b>a) Structure for Managing Program Administration and Oversight</b> Overall grant oversight will be maintained by the City Manager and City Council, who retain fiduciary responsibility for the award. Day-to-day grant administration will be managed either by designated City staff or a competitively procured Third-Party Administrator (TPA) experienced in MSHDA CDBG compliance. The City will maintain separation between financial management, project oversight, and contractor payments to ensure internal controls and accountability. The City will follow its adopted financial policies and procurement procedures in accordance with 2 CFR Part 200 and the MSHDA CDBG Policy Manual.</p> <p><b>b) Roles and Responsibilities</b></p> <ul style="list-style-type: none"> <li>• <b>City Council: Final contract approvals, budget amendments, and oversight of fiscal integrity.</b></li> </ul>

	<ul style="list-style-type: none"> <li>• <b>City Manager:</b> Primary grant signatory, responsible for execution of agreements and overall program compliance.</li> <li>• <b>Clerk/Treasurer:</b> Financial management, draw requests, record retention, and audit coordination.</li> <li>• <b>TPA (if procured):</b> Environmental review coordination, procurement assistance, contractor documentation review, Davis-Bacon compliance monitoring (if applicable), reporting through IGX, and day-to-day grant administration.</li> <li>• <b>Project Engineer:</b> Construction oversight, cost verification, pay application review, and certification of completed work.</li> </ul> <p>Clear documentation protocols will be established to define responsibilities and ensure accountability throughout the project lifecycle.</p> <p><b>c) Management of Key Regulatory Requirements</b>  Brown City will comply with all federal and state regulatory requirements, including:</p> <ul style="list-style-type: none"> <li>• <b>Environmental Review (24 CFR Part 58):</b> The City will complete the required Environmental Review Record (ERR) prior to obligating funds. A qualified environmental consultant may be retained to assist with environmental documentation, including coordination of SHPO review, publication of notices, and Request for Release of Funds (RROF) submission.</li> <li>• <b>Procurement:</b> Conducted in compliance with local policy and 2 CFR Part 200.</li> <li>• <b>Labor Standards (if applicable):</b> Davis-Bacon wage determinations will be incorporated into bid documents, with payroll monitoring and interviews conducted as required.</li> <li>• <b>Section 3: Good-faith efforts</b> will be documented to promote economic opportunities for low-income individuals and businesses.</li> <li>• <b>Financial Management:</b> Segregated accounting, documented draw procedures, and maintenance of supporting documentation for all expenditures.</li> </ul> <p>No physical construction activities will begin until environmental clearance is received and a Notice to Proceed is formally issued.</p> <p><b>d) Monitoring and Compliance Strategies</b>  The City will implement a proactive monitoring system that includes:</p> <ul style="list-style-type: none"> <li>• Pre-construction meetings outlining compliance expectations.</li> <li>• Regular project status meetings and site inspections.</li> <li>• Engineer-certified pay application review prior to draw submission.</li> <li>• Periodic internal file reviews to ensure documentation completeness.</li> <li>• Tracking of timelines, milestones, and reporting deadlines through a project management schedule.</li> <li>• Immediate corrective action procedures if compliance deficiencies are identified.</li> </ul> <p>All project records will be maintained in accordance with federal retention requirements, and the City will cooperate fully with any monitoring or audit reviews conducted by MSHDA.</p> <p>Through defined roles, structured oversight, environmental diligence, and documented monitoring procedures, Brown City will ensure responsible administration of CDBG funds and successful completion of the proposed activities in full compliance with program requirements.</p>
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<b>E</b>	<b>BUDGET – Reflect costs to be incurred after application submission only.</b>					
	<i>Please Total each column as applicable and carry numbers from each row in the Total Proposed Budget column.</i>					
	<b>ACTIVITY</b>	<b>TOTAL # OF UNITS</b>	<b>CDBG FUNDS</b>	<b>LEVERAGE/MATCH FUNDS</b>		<b>TOTAL PROPOSED BUDGET</b>
				<b>APPLICANT</b>	<b>OTHER SOURCES</b>	
	Homeowner Rehab		\$	\$	\$	\$
	Infrastructure (Housing)	17	1,230,000			
	Reconstruction					

Unoccupied Rental Rehab					
Manufactured Housing					
Administration		270,000			
<b>TOTAL</b>		<b>\$ 1,500,000</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>

F	CAPACITY AND IMPLEMENTATION
1	<p><b>Organization and Staff Capacity</b> Describe the organizational capacity, staff composition, and grants management experience of the applicant and, if applicable, its third-party administrator. Please attach resumes and/or job descriptions for identified applicant staff working with this grant.</p> <p><b>Description: Brown City maintains the administrative structure and financial controls necessary to successfully manage a Community Development Block Grant (CDBG) award. The City operates under a Council–Manager form of government, providing clear lines of authority, fiscal oversight, and accountability.</b></p> <p><b>Organizational Structure</b></p> <ul style="list-style-type: none"> <li>• <b>City Council: Provides fiduciary oversight, approves contracts and expenditures, and ensures policy compliance.</b></li> <li>• <b>City Manager: Serves as the chief administrative officer and authorized grant signatory. The City Manager is responsible for overall grant oversight, execution of agreements, and ensuring compliance with state and federal requirements.</b></li> <li>• <b>Clerk/Treasurer: Oversees financial management, accounting, draw submissions, record retention, and audit coordination. The City maintains established internal controls and follows adopted procurement and financial management policies consistent with 2 CFR Part 200.</b></li> <li>• <b>Project Engineer: Provides technical oversight, prepares bid specifications, reviews contractor pay applications, and certifies completed work.</b></li> </ul> <p><b>Grants Management Experience</b> Brown City has experience administering public infrastructure projects and working within state and federal regulatory frameworks. The City understands requirements related to procurement, environmental review, financial documentation, public transparency, and compliance monitoring. The City maintains organized financial systems and segregated accounting procedures to ensure proper tracking of grant funds.</p> <p><b>Third-Party Administrator</b> If awarded, the City will procure a qualified Third-Party Administrator (TPA) through a competitive process to support day-to-day CDBG compliance activities. The TPA will be experienced in MSHDA CDBG administration and federal grant management, including:</p> <ul style="list-style-type: none"> <li>• <b>Environmental Review Record (ERR) preparation and coordination</b></li> <li>• <b>Procurement documentation and contract compliance</b></li> <li>• <b>Davis-Bacon and labor standards oversight (if applicable)</b></li> <li>• <b>Section 3 compliance tracking</b></li> <li>• <b>IGX reporting and draw management</b></li> <li>• <b>File organization and monitoring readiness</b></li> </ul> <p><b>This partnership model ensures the City maintains policy oversight while leveraging specialized compliance expertise to strengthen implementation and reduce risk.</b></p> <p><b>Staffing Support</b> The City has the administrative capacity to oversee contracts, monitor progress, and manage reporting requirements throughout the grant period. Identified staff and/or contracted administrators working on this project will have clearly defined roles and responsibilities, and supporting resumes and/or job descriptions are attached as required.</p>

	<p>Through defined leadership, established financial controls, and access to experienced grant administration support, Brown City demonstrates the organizational capacity necessary to successfully implement and manage the proposed CDBG-funded activities.</p>
<p>2</p>	<p><b>Grant History</b>  List all housing and community development grant awards received by the applicant and/or its third-party administrator in the past five years, including all State awarded grants. Provide the status of each, such as:</p> <ul style="list-style-type: none"> <li>a) Application Pending (include prospective CDBG applications)</li> <li>b) Approved</li> <li>c) Currently Administering</li> <li>d) Completed Successfully</li> <li>e) Please identify any of the listed grants that have been monitored and if there were “no Findings”. For monitored grants with Findings, please provide a summary.</li> </ul> <p><b>The City of Brown City has actively pursued and managed state-funded grants over the past five years, demonstrating its capacity to successfully administer and implement funded projects. A summary of recent grant activity is provided below:</b></p> <ul style="list-style-type: none"> <li>• <b>Grant Name: Category B Grant</b>  <b>Funder: Michigan Department of Transportation (MDOT)</b>  <b>Year Awarded: 2025</b>  <b>Amount: \$54,000</b>  <b>Status: Completed Successfully</b></li> <li>• <b>Grant Name: WM Grant</b>  <b>Funder: Michigan Department of Environment, Great Lakes, and Energy (EGLE)</b>  <b>Year Awarded: 2025</b>  <b>Amount: \$1,382,000</b>  <b>Status: Currently Administering</b></li> <li>• <b>Grant Name: CEM Grant</b>  <b>Funder: Michigan Department of Environment, Great Lakes, and Energy (EGLE)</b>  <b>Year Awarded: 2024</b>  <b>Amount: \$100,000</b>  <b>Status: Currently Administering</b></li> </ul> <p><b>The City of Brown City has demonstrated the ability to successfully complete and administer grant-funded projects in compliance with state requirements. The Category B Grant funded through MDOT was completed successfully, on time, and within budget. The WM and CEM grants are currently being administered in accordance with program guidelines, with appropriate financial management, reporting, and oversight in place.</b></p> <p><b>At this time, none of the listed grants have resulted in monitoring findings. Any monitoring conducted has resulted in no findings, reflecting the City’s commitment to compliance and strong grant management practices.</b></p>
<p>3</p>	<p><b>Implementation Strategy</b>  Describe what makes the applicant uniquely positioned for successful implementation of the selected programs. Explain the planned approach to execution. Please include key milestones or steps to ensure successful grant implementation.</p> <p><b>The City of Brown City is uniquely positioned to successfully implement the proposed infrastructure project due to its strong local leadership, prior project experience, strategic partnerships, and overall community readiness.</b></p>

	<p>The City has demonstrated its ability to manage and complete infrastructure improvements utilizing state and federal funding, including water and sewer system upgrades, roadway improvements, and public infrastructure maintenance. These efforts reflect the City’s capacity to plan, coordinate, and deliver projects efficiently while maintaining compliance with funding requirements and timelines. Key factors supporting successful implementation include:</p> <ul style="list-style-type: none"> <li>• <b>Established Local Capacity:</b> City staff, including administrative leadership and public works personnel, have experience coordinating capital improvement projects and ensuring compliance with procurement, financial management, and reporting standards.</li> <li>• <b>Site Control and Zoning Readiness:</b> The project site is owned or controlled by the development team and is appropriately zoned for the proposed residential use. No rezoning or land acquisition delays are anticipated.</li> <li>• <b>Qualified Development Team:</b> The City is partnering with an experienced developer who has site control and a clear commitment to project execution. Early coordination between the City and developer has ensured alignment on project scope, timelines, and funding strategy.</li> <li>• <b>Strategic Use of External Support:</b> The City will engage a qualified third-party administrator (TPA) and has coordinated with engineering professionals to provide technical expertise, grant compliance oversight, and construction management. This ensures all regulatory requirements, including Davis-Bacon and environmental review, are properly addressed.</li> <li>• <b>Phased and Scalable Project Plan:</b> The project is structured to support initial housing development while establishing infrastructure that can accommodate future phases, allowing for long-term growth and maximizing the impact of the investment.</li> <li>• <b>Community Alignment and Planning:</b> The project aligns with identified regional housing needs and local priorities to expand safe, attainable housing options, supporting broader economic and community development goals.</li> </ul> <p>Through strong leadership, project readiness, and strategic partnerships, the City of Brown City is well positioned to successfully execute the proposed infrastructure and housing activities, ensuring effective use of CDBG funds and meaningful outcomes for the community.</p>
4	<p>Check <b>each</b> item and certify below that the Applicant:</p> <p><input checked="" type="checkbox"/> (a) Understands that all activities undertaken must meet the Federal/state/local code, whichever is stricter.</p> <p><input checked="" type="checkbox"/> (b) Understands that required zoning must be approved for Manufactured Housing, Infrastructure (Housing), Reconstruction, and Unoccupied Rental Rehabilitation activities, and specific sites/addresses must be pre-identified prior to the applicant’s application submission. No specific sites/addresses need to be pre-identified prior to the applicant’s submission for Homeowner Rehabilitation activities.</p> <p><input checked="" type="checkbox"/> (c) Understands that all activities must be completed, invoiced and all expenditures completed and processed with the MSHDA grants management system by the end of the Grant term. Invoices must be submitted at least quarterly.</p> <p><input checked="" type="checkbox"/> (d) Understands that this CDBG funding is not replacement funding; and can only serve as a matching resource for another state and/or federal Program with MSHDA pre-approval.</p> <p><input checked="" type="checkbox"/> (e) Understands that MSHDA reserves the right to reject any and all submissions, or parts thereof, or to waive any informality or defect in any submission if it is in the best interest of MSHDA and the State of Michigan. All submissions shall become the property of MSHDA. All submissions are considered public information and are subject to discovery under the Freedom of Information Act (FOIA). This submission is not a binding agreement and the notice of selection under this Notification does not guarantee project funding. <b>No project expenses may be incurred, nor contracts signed, for any work that will occur after</b></p>

	<p><b>the application is submitted, unless MSHDA provides formal written authorization.. Failure to obtain this approval may jeopardize grant funding.</b></p> <p><input checked="" type="checkbox"/> (f) Understands that the applicant is required to be in compliance and good standing with MSHDA and all other State and Federal Agencies.</p> <p><input checked="" type="checkbox"/> (g) Agrees to adhere to federal, state and local rules and regulations including, but not limited to, HUD, CDBG, MSHDA, MI Neighborhood, CHILL and CDBG Policy Manual, program rules, regulations, regulations, policies, procedures, Grant Agreement, reporting requirements, and the completion of closeout public hearing, monitoring, and grant closeout.</p>
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<b>G</b>	<p><b>COMPLIANCE REQUIREMENTS</b></p> <p>The following MSHDA CDBG Program Compliance Documents are required to be submitted with the CDBG Application or prior to receiving a Grant Agreement as indicated. Refer to the <a href="#">CDBG Policy Manual</a> for details.</p>
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**MUST BE SUBMITTED WITH APPLICATION**

1	<p><b>Choose one:</b></p> <p><input checked="" type="checkbox"/> <b>Proof of funding attached for total project costs, including all leverage/match funds.</b></p> <p><b>OR</b></p> <p><input type="checkbox"/> <b>Proof of funding is not applicable. No leverage/match funds.</b></p>
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2	<p><input checked="" type="checkbox"/> <b>Public Hearing Documentation</b></p> <p><b>Purpose:</b> To ensure public awareness and input regarding proposed CDBG-funded activities.</p> <p><b>Submission Requirements:</b></p> <p>a) Public Hearing Publication Affidavit and Public Hearing Meeting Minutes must be provided.</p> <p>b) Notice must be published in a local or applicable newspaper at least <b>five</b> calendar days before the hearing. The first day counted is the day <b>after</b> publication.</p> <p>Example:</p> <ul style="list-style-type: none"> <li>• The applicant publishes the notice in the paper on 11/10/2026.</li> <li>• Count 5 days, starting 11/11/2026 11/11/2026 + 5 Days = 11/15/2026</li> </ul> <p><b>Public Hearing Notice Must Include:</b></p> <p>a) Total available funding for the proposed project.</p> <p>b) Eligible activities and the estimated amount allocated to low- and moderate-income (LMI) households.</p> <ul style="list-style-type: none"> <li>• 100% will be occupied by low- or moderate-income households <b>[for projects that include Homeowner Rehabilitation, Reconstruction, and Manufactured Housing activities]</b></li> </ul> <p>AND/OR</p> <ul style="list-style-type: none"> <li>• 51% or more will be occupied by low- or moderate- income households <b>[for projects that include Housing Infrastructure and Unoccupied Rental Rehabilitation activities]</b></li> </ul>
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	<p>c) Plans to minimize displacement and provide benefits to displaced persons, if applicable. At minimum as appropriate the applicant may state “zero persons are anticipated to be displaced by the proposed CDBG activities”.</p> <p>d) Information on the applicant’s performance in prior CDBG programs. If the applicant has not implemented CDBG programs, please indicate that no prior performance is available as the applicant has not administered CDBG grants to date. If the applicant has previously received CDBG funds, indicate performance.</p> <p>Refer to <a href="#">MSHDA CDBG Policy Manual</a> Chapter 3 – Notice of Public Hearing (Sample 3-A).</p> <p><b>Proof of Public Notice:</b> Applicants must submit an <b>affidavit of publication</b> or a <b>complete</b> copy of the <b>full newspaper page</b> showing the <b>publication date</b> and notice details.</p> <p><b>Public Hearing Purpose:</b></p> <p>a) Inform citizens of project objectives, activities, locations, and funding allocation.</p> <p>b) Provide the opportunity for public review and comments on the application.</p> <p>c) Include the anticipated application submission date and details on where and when the application can be reviewed.</p> <p><input checked="" type="checkbox"/> <b>Public Meeting Minutes– Guidance and Submission Timeline:</b></p> <p>Draft meeting minutes may be submitted with the application. Minutes should clearly document a public comment period, presentation of the proposed CDBG activities and pursuit of grant, a motion to approve, and record the final voting tally on the proposal.</p> <p>Once approved, public hearing minutes must be submitted to MSHDA before grant award. Approved public hearing meeting minutes will contain a signature approving the document, typically by the Clerk and/or another authorized official, along with the date they were approved.</p>
3	<p><input checked="" type="checkbox"/> <b>CDBG Authorizing Resolution</b></p> <p><b>Purpose:</b> To designate the <b>authorized official</b> responsible for the CDBG application, grant administration, and NEPA Environmental Review Certifying Officer. The authorized official should be an identified individual or position within the applicant’s organization, and not a TPA.</p> <p><b>Submission Requirements:</b></p> <ul style="list-style-type: none"> <li>• Authorizing Resolution (Form 2-A from Chapter 2 of the <a href="#">MSHDA CDBG Policy Manual</a>) must be submitted with the application.</li> <li>• The highest elected official is responsible for signing grant documents unless delegated through the resolution.</li> </ul> <p><b>Instructions:</b></p> <p>Grantees are required to submit an Authorizing Resolution (2-A) designating their authorized official. By default, the highest elected official assumes responsibility of the grant application process, in addition to signing the grant agreement, oversight of grant activities, and signing of grant documents, pay requests, etc. However, these responsibilities may be delegated to another official (elected or hired) through the use of the Authorizing Resolution. The Authorizing Resolution should be completed prior to submitting the application or signing grant related documents and is often in tandem with the public hearing for the overview of the proposed project.</p>

	<p>At time of passing the Authorizing Resolution, the applicant may also designate the Certifying Officer for the NEPA Environmental Review. Please review instructions in the Environmental Review chapter.</p> <p>An adopted CDBG Authorizing Resolution will, at a minimum, contain the following:</p> <ol style="list-style-type: none"> <li>1. Identification of the proposed project.</li> <li>2. Identification of the funding request and the commitment of the Applicant’s matching funds.</li> <li>3. Statement that the proposed project is consistent with the Applicant’s community development plan as described in the Application.</li> <li>4. Statement that all activities will be taken for the purpose of providing and/or improving permanent residential structures, which upon completion: <ol style="list-style-type: none"> <li>a. 100% will be occupied by low- or moderate-income households <b>[for projects that include Homeowner Rehabilitation, Reconstruction, and Manufactured Housing activities]</b> AND/OR</li> <li>b. 51% or more will be occupied by low- or moderate- income households <b>[for projects that include Housing Infrastructure and Unoccupied Rental Rehabilitation activities]</b></li> </ol> </li> <li>5. Statement that no project costs (CDBG and non-CDBG) will be incurred prior to a formal grant award, completion of the environmental review procedures and formal, written authorization to incur costs has been provided by MSHDA.</li> <li>6. Local authorization to submit the Michigan CDBG Application.</li> <li>7. Identification, by title, of the applicant’s authorized person to sign the Application and all attachments.</li> <li>8. Identification, by title, of the applicant’s authorized person to sign the Grant Agreement and all amendments.</li> <li>9. Identification, by title, of the applicant’s authorized person to sign Payment Requests.</li> <li>10. Identification, by title, of the applicant’s authorized person as the National Environmental Policy Act (NEPA) Environmental Review Certifying Officer.</li> </ol> <p>An Authorizing Resolution template is available in the CDBG Policy Manual Chapter 2 – Application and Award Process (2-A Authorizing Resolution).</p>
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4	<p><input checked="" type="checkbox"/> <b>Copy of the applicant’s Procurement Policy.</b> The Procurement Policy must meet be compliant with 2 CFR Part 200 standards (see Procurement Policy section of the CDBG Policy Manual, Chapter 11 – Procurement).</p> <p>Please note that the applicant may have a separate policy for CDBG programs adopted for compliance with CDBG program requirements</p>
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**NOTE: THE FOLLOWING ITEMS ARE SUBMITTED AFTER APPLICATION APPROVAL**

**MUST BE SUBMITTED PRIOR TO GRANT AGREEMENT EXECUTION**

5	<p>Annual Profile Review.  IGX Grant Management System instructions will be provided upon award.  Complete and return 2-E Authorized Signature Designation  Review CDBG Policy Manual Chapter 2 – Application and Award Process</p>
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**MUST BE SUBMITTED PRIOR TO INCURRING ANY PROJECT COSTS (CDBG or non-CDBG)**

6	<p>NEPA Environmental Review.  Review CDBG Policy Manual Chapter 7 – Environmental Review</p>
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**MUST BE SUBMITTED WITHIN 60 DAYS OF GRANT AGREEMENT EXECUTION**

7	<p>Local Program Guidelines.  Complete the Program Guidelines TEMPLATE  Review CDBG Policy Manual Chapter 2 – Application and Award Process (2-C Program Guidelines)</p>
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<b>H</b>	<b>CERTIFICATION BY THE APPLICANT</b> <input checked="" type="checkbox"/> <b>I have read and certify Section H below.</b>
	<p>The applicant states that the person identified in the Authorizing Resolution certifies the following:</p> <ol style="list-style-type: none"> <li>1. Possesses legal authority to submit a grant application.</li> <li>2. Shall comply with 570.486(a) Citizen Participation Requirements of a Unit of General Local Government, including: <ol style="list-style-type: none"> <li>a. Provide for and encourage citizen participation, particularly by low- and moderate-income persons who reside in slum or blighted areas and areas in which CDBG funds are proposed to be used;</li> <li>b. Ensure that citizens will be given reasonable and timely access to local meetings, information, and records relating to the unit of local government's proposed and actual use of CDBG funds;</li> <li>c. Furnish citizens information, including but not limited to: <ol style="list-style-type: none"> <li>i. The amount of CDBG funds expected to be made available for the current fiscal year (including the grant and anticipated program income).</li> <li>ii. The range of activities that may be undertaken with the CDBG funds.</li> <li>iii. The estimated amount of the CDBG funds proposed to be used for activities that will meet the national objective of benefit to low- and moderate-income persons; and</li> <li>iv. The proposed CDBG activities likely to result in displacement and the unit of general local government's anti-displacement and relocation plans required under §570.488.</li> </ol> </li> <li>d. Provide technical assistance to groups representative of persons of low and moderate income that request assistance in developing proposals in accordance with the procedures developed by the state. Such assistance need not include providing funds to such groups.</li> <li>e. Provide for a minimum of two public hearings, each at a different stage of the program, for the purpose of obtaining citizens' views and responding to proposals and questions. Together the hearings must cover community development and housing needs, development of proposed activities and a review of program performance. The public hearings to cover community development and housing needs must be held before submission of an application to the state. There must be reasonable notice of the hearings, and they must be held at times and locations convenient to potential or actual beneficiaries, with accommodations for the handicapped. Public hearings shall be conducted in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents can reasonably be expected to participate.</li> <li>f. Provide citizens with reasonable advance notice of, and opportunity to comment on, proposed activities in an application to the state and, for grants already made, activities which are proposed to be added, deleted or substantially changed from the unit of general local government's application to the state. Substantially changed means changes made in terms of purpose, scope, location or beneficiaries as defined by criteria established by the state.</li> </ol> </li> </ol>

	<p style="margin-left: 40px;">g. Provide citizens with the address, phone number, and times for submitting complaints and grievances, and provide timely written answers to written complaints and grievances, within 15 working days where practicable.</p> <p>3. Has in a timely manner:</p> <p style="margin-left: 40px;">a. Furnished its citizens information concerning the amount of funds available and being applied for, and the proposed community development and housing activities to be undertaken, including the estimated amount proposed to be used for activities that will benefit persons of low and moderate income and the plans for minimizing displacement of persons due to proposed activities and for assisting persons displaced.</p> <p style="margin-left: 40px;">b. Published public notice in such manner to afford citizens an opportunity to examine and submit comments on the proposed application and community development and housing activities.</p> <p style="margin-left: 40px;">c. Held one or more public hearings to obtain the views of citizens on the proposed application and community development and housing needs; and</p> <p style="margin-left: 40px;">d. Make the proposed application available to the public.</p> <p>4. Will conduct and administer the grant in conformity with Public Law 88-352 and Public Law 90-284 and will affirmatively further fair housing.</p> <p>5. Has developed the proposed application so as to give maximum feasible priority to activities which will benefit low- and moderate-income families or aid to the prevention or elimination of slum or blight; or to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to health or welfare of the community where other financial resources are not available to meet such needs.</p> <p>6. Has developed a community development plan or community development narrative that identifies community development and housing needs and specifies both short- and long-term community development objectives that have been developed in accordance with the primary objective and requirements of the Title I Housing and Community Development Act of 1974, as amended;</p> <p>7. Will not attempt to recover any capital costs of public improvements assisted in whole or in part with Title I 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) Title I funds are used to pay the proportion of such fee or assessment that related to capital costs of such public improvement that are financed from revenue sources other than Title I funds; or (B) for purposes of assessing any amounts against properties owned and occupied by persons of low and moderate income who are not persons of very low income, and (name of local unit) certifies that it lacks sufficient Title I funds to comply with the requirements of clause (A);</p> <p>8. Will adopt a policy of prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such nonviolent civil rights demonstrations within its jurisdictions.</p> <p>9. No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned 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 entering into of any</p>
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	<p>cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant or cooperative agreement;</p> <p>10. 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 a federal contract, grant, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions;</p> <p>11. The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, and contracts under grants and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.</p> <p>12. Will comply with other provisions of Title I of the Housing and Community Development Act of 1987, as amended, and with other applicable laws.</p>
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<b>I</b>	<p><b>STATEMENT OF ASSURANCES</b>      <input checked="" type="checkbox"/> <b>I have read Section I and assure the following:</b></p>
	<p>The applicant states that the person identified in the Authorizing Resolution assures the following:</p> <ol style="list-style-type: none"> <li>1. Compliance with financial management and audit requirements in 2 CFR Part 200; Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule.</li> <li>2. Compliance with Civil Rights and Equal Opportunity statutes as set forth in Title I of the Civil Rights Act of 1964 (Public Law 88-352), Title VIII of the Civil Rights Act of 1968 (Public Law 90-284), the Michigan Civil Rights Act 453 of 1976, the Michigan Fair Employment Practices Act (MCL 423, 301-423, 311), related statutes and implementing rules and regulations.</li> <li>3. Compliance with Labor Standards statutes as set forth in the Davis-Bacon Fair Labor Standards Act (40 U.S.C. 276a-276a-5), related statutes and implementing rules and regulations.</li> <li>4. Compliance with Lead Based Paint Poisoning Prevention Act (42 U.S.C. 4831).</li> <li>5. Compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4630) and implementing regulations.</li> <li>6. Compliance with Section 504 of the Rehabilitation Act of 1973, as amended, and implementing rules and regulations 24 CFR Part 8.</li> <li>7. Compliance with the Citizen Participation Plan (24 CFR Part 570.486 (A)) and implementing regulations.</li> <li>8. Authorized state officials and representatives will have access to all books, accounts, records, reports, files, and other papers, things, or property pertaining to the project to make audits, examinations, excerpts, and transcripts; each contract or subcontract also shall provide for such success to relevant data and records pertaining to the development and implementation of the project. Units of local government will provide reasonable access to records regarding the past use of CDBG funds consistent with State or local requirements concerning the privacy of personal records.</li> </ol> <p>States and units of local government will retain records for the greater of three years from closeout of the grant to the state, or the period required by other application laws and regulations.</p>

	9. The applicant agrees to assume all the responsibilities for environmental review, decision making, and action as specified and required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321) and Section 104 (f) of Title I of the Housing and Community Development Act and implementing regulations 24 CFR Part 58.
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<b>J</b>	<p><b>CHOICE LIMITING ACTION ACKNOWLEDGEMENT</b></p> <p><input type="checkbox"/> I acknowledge that engaging in choice-limiting activities prior to submitting the Request for Release of Funds (RROF) and Certification and receiving authorization, may jeopardize this project’s eligibility for funding. Such actions may result in disqualification from CDBG funding and/or require repayment of CDBG funds already expended.</p>
	<p>In accordance with 24 CFR Part 58, neither the recipient nor any participant in the project—including public or private nonprofit organizations, for-profit entities, or their contractors—may commit or expend federal or non-federal project funds prior to approval of the Environmental Review Request for Release of Funds (RROF) and Certification, and subsequent authorization from MSHDA, unless explicitly allowed under 24 CFR Part 58.</p> <p>Examples of prohibited choice-limiting actions include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Acquisition of land or property</li> <li>• Demolition activities</li> <li>• Closing on loans</li> <li>• Signing contracts</li> <li>• Beginning construction or rehabilitation work</li> </ul>

<b>K</b>	<p><b>CERTIFICATION BY AUTHORIZED SIGNATORY</b></p> <p>The individual signing below is either the highest elected official or has been duly authorized through an Authorized Resolution. By signing, they certify that:</p> <ol style="list-style-type: none"> <li>1. All required fields in this application have been completed and reviewed.</li> <li>2. The Certifications and Assurances included herein have been reviewed and acknowledged.</li> <li>3. No project costs (CDBG and non-CDBG) will be incurred prior to a formal grant award, and written authorization to incur costs has been provided by MSHDA.</li> <li>4. To the best of their knowledge, the information provided in this application is accurate and current.</li> <li>5. The applicant agrees to comply with all applicable HUD, CDBG, and MSHDA rules, regulations, policies, procedures, and reporting requirements.</li> <li>6. All entities involved in the implementation of the proposed project will also comply with these rules and regulations throughout the grant administration process.</li> </ol> <p>The information below, including signature, must be completely filled out with this submission.</p>	
	SIGNATURE	
1	NAME	Kyle Harris
2	TITLE	City Manager
3	PHONE	810-346-2325
4	EMAIL	kharris@cityofbrowncity.net

5	DATE	
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