

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																
A.1	<p>PHA Name: <u>Highland Park Housing Commission</u> PHA Code: <u>MI105</u> PHA Type: <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/1/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>198</u> Number of Housing Choice Vouchers (HCVs) <u>0</u> Total Combined Units/Vouchers <u>0</u> PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input checked="" type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. This plan is posted at the offices of HPHC in the Downes Manor building at 13725 John R. Street during normal business hours.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B. Plan Elements

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y	N	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Statement of Housing Needs and Strategy for Addressing Housing Needs
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Financial Resources.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Rent Determination.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Operation and Management.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Grievance Procedures.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Homeownership Programs.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Community Service and Self-Sufficiency Programs.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Safety and Crime Prevention.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pet Policy.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Asset Management.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Substantial Deviation.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Significant Amendment/Modification

Per Resolution H2021.06.16c Affirmation and Recertification of the Definition of a Significant Amendment; Substantial deviations or significant amendments or modifications are defined as discretionary changes in the plans or policies of the HPHC, that fundamentally change the mission, goals, objectives or plans of the agency, and require formal approval of the Board of Commissioners.

Formation of an HPHC Non-Profit: The HPHC will in this plan year establish a non-profit affiliate, the purpose of which may include activities such as own, acquire, finance, refinance, maintain, improve, operate, develop, construct, rehabilitate, manage, lease, provide supportive services to affordable housing for low income seniors and families, and if appropriate or desirable, sell or otherwise dispose of such housing. The board of the non-profit will consist of the members of the HPHC advisory committee or board, with appointments based on service on the HPHC advisory committee or board. Officers will initially consist of Co-Recovery Administrators and HPHC's ED.

*The purpose or purposes for which the corporation is formed are:
The corporation is formed in accordance with the Michigan Nonprofit Corporations Act and is organized exclusively for charitable purposes in accordance with Section 501(c)(3) of the Internal Revenue Code, or any corresponding section of any future federal tax code. In accordance with such charitable purposes, the corporation may own, acquire, finance, refinance, maintain, improve, operate, develop, construct, rehabilitate, manage, lease, provide supportive services to affordable housing for low income seniors and families, and if appropriate or desirable, sell or otherwise dispose of such housing. Subject to the Nonprofit Corporations Act, and Section 501(c)(3), the corporation may engage in any and all manner of business in furtherance of such charitable purposes.*

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):
Home Ownership Programs: The specific contours of a home ownership program have not been devised, but the HPHC plans to work with a CHDO or to-be-created non-profit of HPHC's to develop a home ownership program for the benefit of its residents.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y	N	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hope VI or Choice Neighborhoods.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Mixed Finance Modernization or Development.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Demolition and/or Disposition.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Designated Housing for Elderly and/or Disabled Families.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Conversion of Public Housing to Tenant-Based Assistance.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Occupancy by Over-Income Families.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Occupancy by Police Officers.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Non-Smoking Policies.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Project-Based Vouchers.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Units with Approved Vacancies for Modernization.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval

under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

Mixed Finance Modernization or Development

- **Mixed Finance Modernization:** HPHC is pursuing HUD's Streamlined Voluntary Conversion ("SVC") Program fitting the definition of Mixed Finance Modernization. Please see attached detailed repositioning plan in Exhibit A to include the following general directives: Up to 160 units and eight buildings repositioned through HUD's Streamlined Voluntary Conversion Program to allow outside financing through Low Income Housing Tax Credits and MSHDA bond financing. This repositioning will generate over \$12MM for rehab to include upgrades to all buildings' exteriors and interiors. Residents will be offered more rental assistance options to include HUD Project-Based Vouchers or Tenant Protection Vouchers, administered by MSHDA. Residents will still essentially pay 30% of the adjusted annual income towards rent. HPHC's non-profit will serve as a co-managing member with MHT Housing, Inc., a Michigan non-profit. The following units may or may not be included in this SVC repositioning.
 1. 13725 John R Street (5-Story Downes Manor building): 100 Units: 101, 102, 104, 105, 106, 108, 110, 201-212, 214, 215, 217-225, 301-312, 314,315, 317-325, 401-412, 414, 415, 417-425, 501-512, 514, 515, 517-725.
 2. 257 Tuxedo (3-Story Walk-Up): 16 Units: 101-104, 201-206, 301-306.
 3. 12810 Trumbull (3-Story Walk-Up): 17 Units: 101-104, 106, 201-206, 301-306.
 4. 260 West Grand (3-Story Walk-Up): 6 Units: 101, 102, 201, 202, 301, 302.
 5. E. Grand Townhomes: 9 Units: 37, 39, 41, 43, 45, 47, 49, 51, 53
 6. Hamilton Townhomes: 4 Units: 13552, 13554, 13556, 13558
 7. 2nd Avenue Townhomes: 4 Units: 13095, 13907, 13090, 13911
 8. 3rd Avenue Townhomes: 4 Units: 13904, 13906, 13968, 13910
- Application of not less than 38 units to include 36 single family homes and two duplexes for HUD's Demo/Dispo application. Initially, all parcels/units will be offered for sale. Those units not sold will be transferred to a land bank or demolished leaving vacant lots. The Faircloth authority will be preserved for future development. The few remaining residents will be provided tenant protection vouchers or encouraged to pursue other home ownership programs. Twelve of these units have been contracted and funded for demolition with the vacant lots eventually being offered for sale under the demo/dispo application. The following units may or may not be included in the demo/dispo application:
 1. Single Family Homes: 119, 154 & 174 E. Buena Vista, 393 Louise, 126 & 166 Colorado, 111 Cortland, 234 Richton, 91 Florence, 346 Highland, 169 Grove, 93 Ford, 215 California, 134 Colorado, 233 Colorado, 58 Grove, 84 Grove, 186 Massachusetts, 198 Pasadena, 139 E Buena Vista, 305 Cortland, 169 Connecticut, 109 W. Grand, 191 W. Grand, 201 W. Grand, 319 Highland, 312 Moss, 182 Pasadena, 231 Pasadena, 242 Richton, 82 Sturtevant, 197 Winona, 52 Tuxedo and 94 Ford
 2. Duplexes: 169 Pasadena, 171 Pasadena, 93 Cortland, 95 Cortland
- HPHC and the non-profit will share the same board, appointed by the City of Highland Park's mayor and retain certain levels of ownership in all facets of the repositioning.

Demolition and/or Disposition

As part of portfolio repositioning, the PHA may pursue further demolition and disposition activities within the portfolio, beyond those already approved by HUD. Any specific plan would require a significant amendment in order to maintain the fullest transparency and accuracy of the PHA Plan. PHA is going pursue Demo/Dispo with respect to the scattered site repositioning. Initial plan was to demolish 12 vacant single family homes, but as conditions changed, it has become more apparent to potentially dispose of or demolish additional units. As part of the demo/dispo process, all parcels and buildings will be offered for sale as-is for fair market value. Those units not sold will be offered to local land banks. If parcels with buildings don't sell they will be demolished.

Conversion of Public Housing to Tenant-Based Assistance

As part of HPHC's pursuit of repositioning through RAD or Streamlined Voluntary Conversion ("SVC"), transition from Section 9 subsidies to Section 8 Tenant-Based Assistance will likely be pursued affording residents a more viable and flexible rental assistance platform.

Conversion of Public Housing to Project-Based Assistance under RAD

HPHC plans to pursue repositioning activities, and has engaged TA providers to assist with determining the methodology and recommendations for these activities. Recommendations received will be publicly vetted and community input will be both sought and highly valued in determining the future state of the portfolio for HPHC. No specific plans have been made at this time, but these are anticipated to be developed during this fiscal year. A significant amendment will be needed once a path forward has been plotted in order to maintain the fullest transparency and accuracy of the PHA Plan.

Occupancy by Over-Income Families

A few residents may be over income and prohibited to remain in residency through post conversion. The development partner will work with these residents for relocation to suitable rental housing.

	<p>Project Based Vouchers As part of HPHC's pursuit of repositioning through RAD or SVC, transition from Section 9 subsidies to Section 8 Project Based Vouchers will likely be pursued affording residents a more viable rental assistance platform.</p> <p>Capital Grant Programs HPHC pursued and was awarded a 2021 and 2022 Emergency Grant and a 2022 Receivership Grant and will apply for a 2023 Emergency Grant. There is a backlog of deferred maintenance, safety/security concerns, and unmet physical needs which will require all available funding resources to ameliorate.</p>
<p>B.3</p>	<p>Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>The 5YP for FYE 9/2022 has been adopted and missions and goals similar to the ones outlined herein are being pursued. Notable progress has been made in HPHC being awarded \$6.1MM in Emergency and Receivership grants as well as making available ~\$2MM in capital funds from the 2020-2024 5YCAP.</p> <p>Performance: HPHC completed two UPCS inspections of all properties to identify and address deficiencies. A Physical Needs Assessment was conducted and the results will be used to inform future capital planning efforts. HUD has taken possession of the PHA and made strides towards improving transparency, compliance, and sustainability at the PHA.</p> <p>Development: A property management agreement has been renewed into with Continental Management, which includes provisions to provide training opportunities to on-site administrative and maintenance staff.</p>
<p>B.4</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>Please see attached and revised 5YCAP, approved December 15, 2021.</p>
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: The most recent completed audit is 2020. The auditor issued a qualified report.</p>
<p>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p><i>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>

C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>The PHA has a comprehensive Recovery Agreement in place, executed December 2018. Breach of the terms of this agreement led to a declaration of substantial default by HUD on 4/29/21, with HUD taking possession on 5/10/21. Co-Recovery Administrators are currently working to close out the Recovery Agreement and otherwise improve the status of the PHA.</p>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PIAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p>Fair Housing Goal:</p>

Describe fair housing strategies and actions to achieve the goal

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Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5 154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(iii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2 (24 CFR §903.23(b)). Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing (24 CFR §903.7(n))

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(ii))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the "Sample PHA Plan Amendment" found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2 \(24 CFR §903.23\(b\)\)](#)

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

HOPE VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission; 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.503\)](#) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.505\)](#) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03. \(24 CFR §903.7\(e\)\)](#)

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan

statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7(g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.



An affordable non-profit housing corporation serving Michigan's housing needs

Narrative for Highland Park Housing Commission Redevelopment

Pursuant to the Recovery Agreement between Highland Park Housing Commission ("HPHC") and HUD, dated December 11, 2018, HPHC was required to pursue restructuring of the housing authority. The objective is to address many issues including significant deferred maintenance and a desire to create a more viable, accountable, and financially sound structure to ensure quality affordable housing for Highland Park residents well into the future.

On April 29, 2021, HUD took receivership of the housing authority with this goal in mind while placing great importance on local engagement and participation. On September 1, 2023, MHT Housing, Inc. ("MHT") was chosen as development partner to assist HUD with the repositioning. The overall repositioning of HPHC's 198-unit portfolio is being implemented through HUD applications under the Streamlined Voluntary Conversion ("SVC") and a Demo/Disposition application. Please see Exhibit A for specific addresses and HUD applications. Under HUD's direction, HPHC is creating a wholly owned non-profit with local community individuals who will serve as board members with the same individuals serving as board members of HPHC.

PHASE I - LIHTC and MSHDA Bond Financing of up to 8 parcels containing up to 160 Units:

Within the existing HPHC portfolio there are up to 8 separate multifamily buildings containing up to 160 units. These eight buildings and their contents will be sold to the new LDHA entity with HPHC's non-profit via as a co-developers with an MHT affiliated entity. Given the timing of this notice the number of units and buildings may decrease slightly due to certain factors, but will not exceed 160 units under the following terms:

- The purchase price will be the appraised as-is restricted value of all eight buildings in Schedule A.
- 100% of the sale proceeds will be used as a source in the LIHTC transaction and will be represented as HPHC note.
- Section 8 budget authority will be provided by HUD with MSHDA acting as contract administrator for up to 160 Section 8 Project Based Vouchers. At the end of tax credit compliance period, HPHC will retain an option to purchase and a right of first refusal with a further option to purchase the developer's interest. Please see Exhibit B: Repositioning Chart for Unit Type and Voucher Plan.
- Please see Exhibit C for a timeline for the positioning.

Given the development team's familiarity with the local jurisdiction residents electing to leave HPHC should have favorable success in utilizing tenant protection vouchers as part of the SVC's relocation plan. Further, the impact of this repositioning is not anticipated to result in an additional concentration of poverty and ultimately increase the number of viable units within the jurisdiction. Finally, HPHC will ensure compliance with US Housing Act of 1937 42 U.S.C. 1437p(a)(5) regarding over-income residents and relocation regulations. Please see Exhibit B: Financing Commitments

As required by the SVC Program, both resident and public comment is required regarding the overall plan as described herein, and specifically the physical upgrades and changes planned. To this end,

several meetings with residents and public will be held, and the development team intends to make \$11,335,60 of hard cost improvements (\$70,848/unit) as outlined in Exhibit C: Phase I Physical Improvements. Very specific examples and details are available at HPHC in the management office at 13725 John R Street, Highland Park MI, 48203.

PHASE II –DEMO/DISPO Application Submission of 36 parcels containing 38 Units.

The remaining 36 parcels/38 units (please see Exhibit A) not contained in the Phase I preservation transaction will be immediately sold at fair market value through a HUD demo/dispo application in order to preserve Faircloth authority for future development under the following terms. Please see Exhibit C for timing of this submission.

- At least 12 of the 38 units will be vacant land as HUD has already approved and granted funds to demolish the dilapidated structures on those parcels. The vacant cleared land will then be put up for sale.
- Any additional demolition costs of the other 26 parcels not sold as is will be funded through the non-profits share of the LIHTC Developer Fee. If any timing issues exist for the expediting of demolition, bridge financing will be sought, likely by MHT Housing, Inc.'s CORE Community Partners.
- If at a point in time through this process it becomes evident the parcels cannot be sold, the HPHC will dispose of the units and/or land to Wayne County's land bank or to the City of Highland Park. These 38 units vary with respect to occupancy, date vacated and physical condition.
- Please see Exhibit C outlining what program each unit will be submitted under and how residents will continue to receive rental assistance through various specified programs to include Tenant Protection Vouchers, Project Based Rental Assistance, home ownership through an alternative program.
- Should the number of units in Phase I decrease, the number of units in Phase II will increase correspondingly.

The goal of this multifaceted repositioning plan will serve not only preserve existing viable units for long term financial and physical viability, but also to decrease the area's blighted parcels while creating beneficial partnerships that maintain local ownership, input and financial benefits.

Exhibits:

Exhibit A: Specific Unit Address Schedule for Repositioning

Exhibit B: Repositioning Chart for Unit Type and Voucher Plan

Exhibit C: Proposed Repositioning Timeline.

Exhibit D: Proposed Physical Improvements.

Exhibit E: Other Required SVC Attachments

Exhibit A

Specific Unit Address Schedule for Repositioning

Units Reposition Through HUD's Streamlined Voluntary Conversion

1. 13725 John R Street (5-Story Downes Manor building): 100 Units: 101, 102, 104, 105, 106, 108, 110, 201-212, 214, 215, 217-225, 301-312, 314,315, 317-325, 401-412, 414, 415, 417-425, 501-512, 514, 515, 517-725.
2. 257 Tuxedo (3-Story Walk-Up): 16 Units: 101-104, 201-206, 301-306.
3. 12810 Tumbull (3-Story Walk-Up): 17 Units: 101-104, 106, 201-206, 301-306.
4. 260 West Grand (3-Story Walk-Up): 6 Units: 101, 102, 201, 202, 301, 302.
5. E. Grand Townhomes: 9 Units: 37, 39, 41, 43, 45, 47, 49, 51, 53
6. Hamilton Townhomes: 4 Units: 13552, 13554, 13556, 13558
7. 2nd Avenue Townhomes: 4 Units: 13095, 13907, 13090, 13911
8. 3rd Avenue Townhomes: 4 Units: 13904, 13906, 13968, 13910

Single Family and Duplex Units Reposition Through Demo/Dispo Application

Single Family Homes: 119, 154 & 174 E. Buena Vista, 393 Louise, 126 & 166 Colorado, 111 Cortland, 234 Richton, 91 Florence, 346 Highland, 169 Grove, 93 Ford 215 California, 134 Colorado, 233 Colorado, 58 Grove, 87 Grove, 186 Massachusetts, 187 Pasadena, 139 E. Buena Vista, 305 Cortland, 169 Connecticut, 109 W. Grand, 191 W. Grand, 201 W. Grand, 319 Highland, 312 Moss, , 182 Pasadena, 231 Pasadena, 242 Richton, 82 Sturtevant and 197 Winona 52 Tuxedo & 94 Ford

Duplexes: 169 Pasadena, 171 Pasadena, 93 Cortland, 95 Cortland,

Exhibit 6: Highland Park Housing Commission 198 Unit Repositioning Chart: Vouchers and HUD Applications

# of Units and Type		SVC Repositioning Application: Section 9 to Section 8				SVC Demo/Dispo application for 38 units		
		12870 13725 John R St, Trumbull: 100 Unit 5-Story Low Rise, mostly elderly	257 Tuxedo: 17-Unit 3- story walk-up	37 - 53 E. Grand Town homes: 9 units	13552-13558 Hamilton Town homes: 4 units	13905- 13911 2nd Ave Town homes: 4 units	13094-19910 3rd Ave Town homes: 4 units	12 SF units (2) 24 units (2 duplexes/20 SF's) (3) 2 SF Units (4)
SVC PIC SAC application		160 Units/8 buildings financed with LIHTC's/MSDHA 4% Bonds				Remaining 38 units only be noted in SVC application for future redevelopment.		
Demo/Dispo Application (eventual Faircloth to RAD Application Submitted to Office of Recapitalization)	Unit Physical Condition Status	N/A						36 vacant units considered obsolete with many having long term vacancy
	Application Action	N/A						Apply for 26 Demo/Dispo to reserve Faircloth authority for future redevelopment. <small>Sale of 2 occupied Single-Family Homes not obsolete</small>
PBV's		HUD issue 160 PBV's/HAP Section 8 Contract administered by HUD-backfill TPV units with PBV's.				N/A	N/A	N/A
HUD TPV Vouchers (administered by MSHDA)		SVC/HUD provides TPV's tenants who desire to move out at SVC Conversion				9 tenants in residency within last 24 month to receive HUD TPV vouchers.	2 HUD TPV's	
Other Relocation Program		N/A (100% PBV Eligibility assumed)				N/A	N/A	2 Current tenants offered Right of First Refusal to purchase home.

(1) These 12 vacant SF units will be demolished in 3Q 2024, then vacant lots put up for sale.

(2) Address for 12 SF HUD approved demo: 119, 154 & 174 E. Buena Vista, 393 Louise, 126 & 166 Colorado, 111 Cortland, 234 Richton, 91 Florence, 346 Highland, 169 Grove & 93 Ford.

(3) 215 California, 134 Colorado, 233 Colorado, 58 Grove, 87 Grove, 186 Massachusetts, 187 Pasadena, 139 E. Buena Vista, 93 Cortland, 95 Cortland, 305 Cortland, 169 Connecticut, 109 W. Grand, 191 W. Grand, 201 W. Grand, 319 Highland, 312 Moss, 169 Pasadena, 171 Pasadena, 242 Richton, 82 Sturtevant and 197 Winona

(4) SF 52 Tuxedo & 94 Ford

Exhibit C: Highland Park Housing Redevelopment Plan Timeline

Units	Timeline										2041			
	2024	2025	2026	2027	2028	2029	2030	2031-2040	2041					
100 5-story low rise-Downes Manor 17 3-story walk-up-Trumbull 16 3-story walk-up-Tuxedo 6 2-story walk-up West Grand 9 Row Townhomes-E. Grand 4 Row Townhomes-Hamilton 4 Row Townhomes-2nd Ave. 4 Row Townhomes-3rd Ave.	2Q	3Q	4Q	1Q	2Q	3Q	4Q	2026	2027	2028	2029	2030	2031-2040	2041
	<p align="center">PHASE I (SVC, MSHDA Financing, Tax Credits)</p>													
	<p>SVC Close HPHC transfers real estate through</p>													
	<p>Submit SVC PIC App</p>													
	<p>Construction Rehab</p>													
	<p>Units PIS</p>													
	<p>Utilize Developer Fee to fund unit demo</p>													
	<p>Tax Credit Compliance Period</p>													
	<p>PHASE II: Demo/Dispo Application to HUD's Office of Recapitalization & Request to Preserve Authority Preservation for Future Development</p>													
34 Single Family Homes-vacant	<p>Market units for sale</p>													
	<p>Apply for Demo/Dispo</p>													
38 Total units for Demo/Dispo	<p>Work with City/land bank to dispose of vacant lots or buildings</p>													
	<p>Apply for CORE bridge financing (if needed) to demo unsold units.</p>													
198 TOTAL HPHC UNITS	<p>Demo Unsold Units</p>													
	<p>Demo units funded by Phase I Developer Fee</p>													

HP has Right of First Refusal to sell or buy out TC partners

Utilize Developer Fee to fund unit demo

Demo units funded by Phase I Developer Fee

Apply for CORE bridge financing (if needed) to demo unsold units.

Demo Unsold Units

Exhibit D

Proposed Physical Improvements

(Final product and material design may differ based upon pricing, supply chain issues and budgetary matters)

Building:

- Exteriors - repair driveways, siding (vinyl) parking areas, sidewalks and fencing; new landscaping and benches.
- Electrical and Mechanical - New generators, fire suppression systems, smoke and fire detectors, air conditioners, furnaces and boilers.
- Stairways - new railings, flooring and treads; wall crack repairs.
- Common areas and rest rooms - new doors, security doors, paint, wall finishes and flooring.
- Roofing - replace roofs as needed.
- Hallways - new paint, carpet and flooring, doors, lighting.
- Lobbies/Mail Facilities - repair and paint lobby walls, new mounted mailboxes.
- Community Rooms - new paint and flooring, new furnishings, replace appliances.
- Offices - new paint and flooring.
- Common Laundry Rooms - new paint.

Dwelling Units:

- Kitchens - new appliances, cabinets and Countertops.
- Bathrooms - new paint, flooring, fixtures, cabinets and exhaust fans.
- Living Areas - replace doors, new paint and flooring.
- In-Unit Electrical and Mechanical - new furnace and air conditioning units, replace circuit breakers, new smoke and CO2 detectors, install fire suppression and emergency call systems.

MSHDA Standards of Design Guidelines can be found at:

https://www.michigan.gov/mshda/-/media/Project/Websites/mshda/developers/construction/mshda_standards_of_design.pdf?rev=753aa200e8044786af2049a3e4fdc14c&hash=D4F2BFFA49726F0CFCD5EB3A2499DE7B

Sample Color Board for Interior Upgrades

Interior Selections

The interior of the units consisted of a full remodel for every unit layout.

The existing cabinetry and countertops will be replaced with a counter presenting a more updated and cleaner look to the unit. Along with the cabinetry, all new Energy Star appliances will be installed to reduce operating costs. These improvements include refrigerator, Stove/Oven and range hoods. The kitchen also received new LED lighting and ceiling fan combo to be rewired along with all new outlets and electrical covers.

The Living area flooring will be replaced with floating LVT plank, possibly in tuscan griege color covering the entire unit besides the bedrooms. This plank is more durable, lasts up to 20 years and is much easier to clean than carpet thereby reducing turn over costs significantly. We also plan on installing new plug outlets, cover, and switches along with new windows, blinds and fresh paint throughout the unit. New Carbon/smoke combo alarms will be hard wired into the units. New HVAC equipment with 90% efficiency technology will be installed in every unit along with a new thermostat.

The bedroom improvements will consist of new carpet, paint, electrical outlets and paint along with windows and blinds. All door hardware will be replaced throughout the units as well as some specific doors. The bedrooms will also receive new LED light fixtures brightening up the rooms.

The bathroom improvements will included a new elevated and longated water sense toilet with new vanity, vanity mirror/medicine cabinet. All new lighting will be installed installed as well as new toilet paper fixture and towel bars. All showers received new trim kits and refurbished tile surrounds that were steam cleaned back to their best condition. New electrical outlets and covers will be installed as well.

All common hallways received new durable carpeting and new paint color layouts. All exterior entries received new tile and key fab doors as needed. New mailboxes to be installed.

Resident Unit- walls & ceiling

Silverpointe SW 7653



Vinyl Flooring

TUSCAN GREIGE



Carpet

Bel Aire Seaside

Commercial Concepts 26 oz style



Cabinetry Kitchen & Bathroom cabinets

Saco Cabinets- Avalon line

Finish: Stained Stone



Countertop & Back Splash- Kitchen & Bathroom

Wilsonart Bordeaux Juparana 4929-38



Hardware

Cabinets & Vanity Pulls



Towel Bar



Towel Paper Holder



Grab Bars



Appliances

Refrigerator
(no ice maker)



Hood



Range



Medicine Cabinet



Plumbing

Kitchen Sink



Kitchen Faucet



Bathroom Sink



Bathroom Faucet



Electrical

COMBO CARBON MONOXIDE/SMOKE ALARM



Lighting Interior



Hardware



Finished Interior Space Designs



General finishes for upgraded kitchen



Bathroom vanity, lighting, toilet



Samples of like hallway improvements



Typical shower insert install. No door. Small lip on drainage tray.
Possibly grab bars and handhead shower heads.

SAMPLE COLOR BOARDS

Exterior Selections

Lighting Exterior



Roofing (20-30yr gray asphalt shingles)

(Similar to Tuxedo and Trumbull Building)



If all windows are not replaced with PHA receivership grant funds, remaining windows will be matched in style and manufacture through the repositioning.



Examples of vinyl siding to be used on scattered site townhomes and walk-ups.

Exhibit E

Other Required SVC Attachments

Impact Analysis

Several factors would lead to the conclusion that Highland Park Housing Commission (“HPHC”) pursuing HUD’s Streamlined Voluntary Conversion (“SVC”) resulting in a transition from project-based assistance provided under PIH subsidies to a voucher based rental assisting with more mobility option will have virtually no negative impact on the neighborhood or local poverty conditions and ultimately expand and improve the quality of the affordable housing stock within the City of Highland Park.

1. The City of Highland Park (“City”) is small in size, less than three square miles. Some options exist in this small footprint within the city as described in Exhibit A with a combination of full market rate properties accepting vouchers to tax credit financed communities accepting Tenant Protection Vouchers (“TPV’s) should HPHC residents not choose to remain at HPHC electing to project base their subsidy and unit. The City lies within the footprint of the larger City of Detroit with many of HPHC’s properties within block of the City of Detroit. Consequently, it is logical to assume HPHC residents choosing to leave, may very well seek residency within the adjacent City of Detroit. MHT Housing, Inc. (“MHT”), as a developer and owner and it’s associated property management company Continental Management (“CM”) comprise the largest property manager and multifamily owner within the Detroit metro area. Many of its properties under ownership and management accept TPV’s with varying levels of availability from immediate to waiting lists well over six months. Please see Exhibit B for listing of these other 42 other prop within Detroit acceptPV’s

2. The average time a HPHC tenant remains in tenancy is *ten* years, implying a high level of resident satisfaction. The reason for residents to leave is not living conditions, but typically the older residents need a higher level of care, sometimes either going to an assisted living facility, passing away or moving closer to family, or lease violations.

3. On average, HPHC has a waiting list of well over 150 potential residents reflecting the fact that units for new residents don't come available too often because existing residents are satisfied.

4. The buildings are undergoing \$9MM of PHA grant physical improvements and will also receive an addition \$11MM of further capital improvement through the SVC transaction. Residents will enjoy newly refurbished units and common areas as outlined in the revised 2023 Annual Plan. The rehab would make HPHC one of the newest improved properties in the submarket furthering its desirability.

5. Currently HPHC is 100% income restricted multifamily housing as its use for the asset and land. The SVC conversion along with the Low Income Housing Tax Credits, 4% MSHDA bond financing and MSHDA's Housing Trust Funds include similar income and use restriction extending out several decades from SVC closing. Consequently, with no use change in the real estate, virtually no impact is anticipated on the neighborhood nor poverty in the immediate vicinity is anticipated. The only bearing on poverty would actually be positive mitigating one by increasing the number of tenant subsidies in the area available to low income residents when the HPHC's newly formed non-profit anticipates replacing unsatisfactory existing single family homes and duplexes with new, refreshed affordable housing better meeting the needs of the community. MSHDA, as voucher contract administrator, has agreed to back fill all vacated units with project based vouchers. Therefore, when a resident leaves HPHC, they take the voucher/rental assistance with them, only to have MSHDA add the unit to the project based HAP contract. In essence, every resident who vacates their unit with a subsidy, another subsidized unit for someone to live in is created.

Impact Summary: Based upon the above referenced conditions specific to HPHC and its place in the neighborhood, virtually no impact is anticipated in the local neighborhood with respect to its low income residents, both living in HPHC and other close proximity low income communities. HPHC residents are satisfied with their current living conditions evidenced their long tenures in residency along with proposed

building enhancements to further improve living conditions. Further, the building's use will remain unchanged for the foreseeable future.

Exhibit B

MHT Housing, Inc./Continental Management, LLC Properties Accepting TPV's

- 1 9100 on Gratiot Apartments
- 2 Agnes Street Apartments
- 3 Aurthur Antisdell Apts.
- 4 Bell Building
- 5 Bellemere Senior Apts
- 6 Bridgeview I
- 7 Bridgeview II
- 8 Cabot Building
- 9 Carson Building
- 10 Chapel Hill Townhomes
- 11 Claradale Building
- 12 Clay Apartments
- 13 Day Star Estates
- 14 Dickerson Manor
- 15 Ferndale
- 16 Field Street I and II
- 17 Genesis Villas
- 18 Helen O'Dean
- 19 Jefferson Meadows
- 20 Jennings Senior
- 21 Kenadall Homes
- 22 Lakewood Manor
- 23 McDonald Square only 30 TPV units
- 24 Milwaukee Junction
- 25 Morningside Commons
- 26 Nortown I
- 27 Pablo Davis
- 28 Palmer Park
- 29 Penrose I and II
- 30 Pilgram Meadows
- 31 Pitt/Carson Building
- 32 Prince Hall
- 33 Robert Thomas
- 34 Roberts III only 74 units
- 35 San Juan
- 36 Springwell
- 37 St. Paul
- 38 University Club
- 39 Vernon Building
- 40 Village Park
- 41 Wellington I & II
- 42 Woodward/Gladstone

HIGHLAND PARK HOUSING COMMISSION

Relocation Plan

I. INTRODUCTION

A. The Purpose and Goal:

Highland Park Housing Commission will perform a substantial rehabilitation of up to 160 units of its portfolio under requirements outlined in 24 CFR 972.230(g)(3). This relocation plan will provide a safe plan for all parties involved during the interior unit construction rehabilitation process.

This Relocation Plan (the "*Plan*") provides policy and guidelines for the fair and equitable treatment of residents who will need to be relocated due to the rehabilitation of the units in the proposed Development (the "*Development*"). The Plan will minimize, to the greatest extent feasible, the hardships of those residents relocated and will serve as the Owner's relocation guide to govern relocation activities.

We anticipate that 100% of the residents will return to the Development as the relocation is temporary for health and safety of the residents as well as the average long tenure of residents at about ten years with about a 150 family waiting list at any given time.

B. The Participants:

C. Summary of Plan:

Construction of up to 160 units requiring resident relocation will begin as of the date of Notice of Commencement. We will also follow all Uniform Relocation assistance and Real Property Acquisition Policy Act of 1970 ("URA") requirements for the repositioning of HPHC.

The residents will have the following options:

- 1) Residents may choose the option to self-relocate off site.
 - a. The Residents' belongings will stay in place during the unit construction.
 - i. If Residents need access to their unit during the rehab, they must coordinate with the on-site superintendent.

The General Contractor will be rehabilitating 7-10 units at a time for 3 weeks. The General Contractor anticipates construction and relocation timeline to be 14-21 days.

II. RESPONSIBILITIES OF PARTICIPANTS

The Owner, General Contractor, Property Manager, and Developer will be responsible for the Relocation Plan as follows:

A. The Owner and Developer will be responsible for:

1. Obtaining MSHDA and HUD approval of the Plan.
2. Monitoring the implementation and execution of the approved Plan.

B. The General Contractor will be responsible for:

1. Mailing the General Information Notice to all residents residing in the Development with copy to Property Manager.
2. Notifying all residents that will be affected by the temporary relocation 30 days prior to the start of construction.
3. Providing the relocating residents with a 15-30 Days Notice to Vacate their unit for the rehabilitation of the unit.
4. Providing the relocating residents with a 7 Days Notice to Return to the rehabilitated unit.
5. Maintain an updated construction schedule on the designated units and inform Property Manager, Owner and effected residents of any significant changes to the schedule.
6. Monitoring expenses, notifying Owner of any significant changes to the expenses as outlined within this Plan.
7. Provide any services required to ensure that the relocation process does not result in different or separate treatment on account of *race, color, creed, age, familial status, ancestry, unfavorable military discharge, marital status, lawful source of income, religion, sex, national origin, sexual orientation or disability*.

C. The Property Manager will be responsible for:

1. Maintaining accurate resident files that document the entire relocation process.
2. Prorating rent payments during the month that the Residents' unit will be rehabbed.
3. Allow a few to remain vacant to be used as temporary units.
4. Inform all temporarily relocated residents who will be relocated onsite that the terms of their lease are to continue to be upheld during the time of their relocation.
5. Keep accurate contact information for residents relocating offsite so they can be notified when it is time to return to their unit.
6. Record and communicate to the General Contractor any resident issues or questions related to the relocation or construction of their unit. Assist in communicating an appropriate solution to the resident based on the recommendations of the General Contractor.

III. NOTICES

A. General Information Notice:

The General Contractor will notify each household of temporary displacement through a General Information Notice. This notice will explain to residents that their current lease will remain in effect with no changes or rental increase, and that they will be kept informed of the nature and dates of any subsequent activities regarding the relocation.

This notice should be sent via U.S. certified mail or hand delivered 30 days before construction is anticipated to begin on the first 7-10 units. The notice will include:

- A basic description of the relocation if needed.
- The relocation procedures and anticipated term of the temporary relocation.
- Telephone number and hours of the Property Manager's office.

V. RENT PAYMENTS

The Property Manager will prorate rent during the month that the unit rehabilitation will take place. Residents who elect to relocate onsite in the temporary unit will still remain responsible to abide by all terms of their lease.

VI. STAFF EXPERIENCE

The Developer, General Contractor and Property Manager all have experience and have worked together before on rehabilitation projects requiring resident relocation. This relocation plan is based on the methods and knowledge the staff has acquired from past rehabilitation projects requiring resident relocation.

VIII. AMENDING THE RELOCATION PLAN

The Owner may amend the Plan with the written notification to all participants.

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IN WITNESS WHEREOF, The Participants have agreed to implement & uphold their responsibilities as set forth in this Plan to be duly executed:

Owner:
Highland Park Housing Commission

T. Van Fox

Date

General Contractor:
MHT Construction, LLC

Date

**Property Manager:
Continental Management, LLC**

Date

**Developer:
MHT Housing, Inc.**

T. Van Fox

Date

Draft

Exhibits (to follow)

Draft

Exhibit F
Center Ridge Arms Unit Relocation Cost - \$2,000

Option 1: Self Relocation

- \$1,500.00 Per Unit Stipend Check (housing and food allowance for the 14 days)
- \$500.00
 - Cleaning/Disinfecting of Rehabbed Unit
 - Shampooing of the carpet for high traffic areas only in Rehabbed Unit

Option 2: Temporary Unit on Site

- \$1,500.00 per Unit Cost to keep Temporary Units furnished, cleaned and maintained.
- \$500.00
 - Cleaning/Disinfecting of Rehabbed Unit
 - Shampooing of the carpet for high traffic areas only in Rehabbed Unit

Note: On site security will be required during after hours until the interior units are completed (5p-8a during week & 24 hours weekend)

Highland Park Housing Commission (“HPHC”)

Streamlined Voluntary Conversion Submission HUD Form 52860E Section 5 #5 Executive Summary of Appraisal and Other Forms of Valuation

Current Valuation (based upon the Capitalization Rate Method): The PIH PHA deed restrictions as evidenced 44 separate Declaration of Trusts and Quit Claim Deeds, with various dates ranging around 2005, providing HPHC only enough rental assistance through an ACC contract to meet all expenses, resulting in an effective zero Net Operating Income. Since HPHC typically does not generate Net Operating Income from its Operating Fund, according to the Capitalization Approach to Valuation, HPHC does not result in any meaningful value under this evaluation methodology. Further, restrictions under PHA regulations prohibit distributions of any kind and the City of Highland Park from receiving any distributions, as any surplus funds must be reinvested into the housing stock.

Below is the income statement for the 2022 and 2021 audited financial statements. While the last two years show deficiencies in Revenue less expenses, this includes depreciation which, when removed as this expense isn’t a cash expense, but accounting adjustment, would result in an average positive cash flow of \$200,000 over the last two year. However, about \$2MM of non-recurring emergency and receivership grants were utilized to produce positive cash flow. Since these competitive grants are not guaranteed nor recurring, the funds should not be used to calculate valuation, thus resulting in no value utilizing the capitalization approach for valuation as is, based upon current regulatory affordable restrictions.

CONDENSED STATEMENTS OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION

	2022	2021	Dollar Change
REVENUES			
Dwelling Rent	\$ 526,706	\$ 504,875	21,831
Operating Grants	1,077,381	867,125	210,256
Total Operating Revenues	1,604,087	1,372,000	232,087
EXPENSES			
Administrative	381,088	160,316	220,770
Tenant Services	13	70,827	(70,814)
Utilities	234,491	274,413	(39,922)
Maintenance	437,724	348,514	89,210
Protective Services	165,639	114,458	51,181
Insurance	212,923	109,338	103,585
Bad Debt	743	7,225	(6,482)
Other Operating Expenses	4,838	48,007	(43,169)
Depreciation	204,034	263,034	(59,000)
Total Expenses	1,641,491	1,395,932	245,559
Excess (Deficiency) Revenues over Expenses	\$ (37,404)	\$ (23,932)	(13,472)

Revenues:

Expenses:

	2022	2021	Dollar Change
Public Housing Operating	\$ 1,077,381	\$ 867,125	210,256
Capital Fund Program			
Total	\$ 1,077,381	\$ 867,125	210,256

The above table is segregated as to the program source of funds, not the use of funds.

MARKETING TRANSITION PLAN

The intent of the Marketing Transition Plan (MTP) is to establish a process between the owner, management agent, and contractor that will be followed for an occupied building during the physical rehabilitation of the building. This plan is essential in helping to minimize disruption to tenants and development operations, retain existing residents, market vacant units and identify various responsibilities during the rehabilitation process.

Communications – Communications is a crucial part of the MTP between the Contractor, Management Agent, and the residents. Primary responsibility for this communication will rest with the Management Agent's on-site property management with a secondary communication responsibility with the Management Agent's regional manager. Contact phone numbers will be communicated to residents via print communications and during the resident meeting as well as posted in the Management Office. At all times, residents will be encouraged to contact the Management Agent's representatives to communicate questions or concerns related to the transition plan/execution; including any challenges they may experience with the Contractor.

Plan Review – Owner has provided MHT Management with a copy of the preliminary and final site plans for the rehabilitation of the property. Management provides input regarding the anticipated rehabilitation scope of work and how the improvements will affect the tenants. A copy of the finalized plans will be held on site and available for tenants review.

Start of Work – The contractor will provide the management agent four to six weeks notice of the start of construction. Management will communicate the anticipated start date to the tenants with an introduction "Notice of Start Date" letter.

Resident Meeting – A representative of the Owner, Contractor and Management Agent will hold a meeting with all residents. Information will be provided on what to expect during the rehabilitation of the property. Residents will be provided details on relocation rights and will be encouraged to participate in the moving, packing and storing of the household goods and personal belongings. Additional tenant meetings will be scheduled as needed. Tenants will be encouraged to voice concerns or ask questions to the on-site manager who will in turn receive directives from the owner and management agent to resolve any issues and keep tenants informed.

Emergency Contact – The local police department, EMS Services and Residents will be provided with a toll free emergency contact number. This service is answered 24-hours a day 7-

days a week and will be available to the residents at any time a representative of the owner, contractor or management agent are not on-site.

Storage - The Contractor and Management Agent will coordinate the designated areas for storage which will allow for sufficient parking near the building(s) occupied by residents.

Contractor – The contractor will clearly identify areas in the parking lot which will be utilized for the storage of material, construction office trailers and worker parking.

Management Agent – The management agent will monitor the resident parking area to assure that the area stays clear of all construction debris and remains available to the residents of the community.

Elevators – The contractor will primarily be utilizing the freight elevator to transport materials. During any work to be completed to the freight elevator, the passenger elevator will be used in the early morning or late afternoon only. There will be an employee of the contractor assigned to operate the passenger elevator during these times to ensure residents that need access to the elevator are accommodated. During any work to be completed to the passenger elevator, residents will utilize the freight elevator. At no time will both the freight and passenger elevators be down at the same time during the rehab.

Relocation Plan - Residents will not be relocated during construction at Van Dyke Center.

The owner, Van Dyke 2023 Limited Dividend Housing Association, LLC and management agent, MHT Management, LLC, will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 or section 104(d) of the Housing and Community Development Act of 1974.

All requirements of the URA, HCDA, and applicable program regulations governing the Development have and will continue to be complied with. Such compliance includes, but is not limited to, delivery of notices, reimbursement of costs, and the provision of planning assistance, advisory services, and coordination assistance, as required under the URA and HCDA.

Daily Displacement of Residents – It is anticipated that the majority of the tenants will be have construction activities in their unit on a daily basis for a period of 7 to 10 days while crews work to rehabilitate their unit. Said plan will eliminate the need for residents to physically move out of their unit on a temporary basis. Residents will be provided boxes and necessary moving materials paid for by the contractor to box up their possessions to help prevent damage and remove items out of the work area of the contractors. Residents will be encouraged to pack their personal belongings but will be provided assistance if they are unable or unwilling to box

up their possessions by themselves. It is acceptable and encouraged that residents, or their family, pack items in boxes provided by the contractor for storage while rehabilitation is taking place. In situations where the resident cannot, or will not, the contractor is ultimately responsible for providing staff and material to pack and relocated needed household goods. In either case, residents are responsible for the packing, securing or moving of personal items such as: purses/billfolds, money, keys, prescription medication, jewelry, iPods, CD's, DVD's or other personal items. Management will reach out to any residents with special needs and accommodate any additional assistance they may need during the work on their unit.

Work will begin by 8 am, Monday through Friday, and work will conclude on all occupied units by 6 pm. *MHT Construction, LLC (MHTC) and all subcontractors will be required to follow MHTC's Covid-19 Memo.* In the event the work requires an extended timeframe or work is continued on a Saturday or Sunday, special arrangements and provisions will be made with the tenants affected. These arrangements will include use of the **Hospitality Spaces** (see below).

Residents will have the choice of a daily allowance of \$15.00 per household member to be used at their discretion for food or entertainment while construction crews work in their unit between the hours of 8am to 6pm or use of the **"Hospitality Spaces"**. All residents can stay in their unit during construction while work is being completed if they choose. For those residents who choose to leave their unit but stay on site during the construction work hours the **"Hospitality Spaces"** will be provided for their use during these hours. Additionally, even those residents who have chosen to accept the daily allowance will be allowed to take advantage of the benefits of the **Hospitality Spaces**.

The **Hospitality Spaces**- Van Dyke Center has a spacious community room with a great deal of seating that can accommodate multiple families at a time.

During renovations, five to eight units will be under construction at one time. It is expected that work started each day will be completed by 6 pm the same day. If for any reason the scope of working being performed that day is not completed and ultimately causes displacement from the individual's unit, we have set-a-side three units as hospitality/model units that can be used for resident relocation. The three units set-a-side will be fully furnished to accommodate an overnight stay. If for some reason the three units that are set-a-side are being used for overnight accommodations and more units are needed for residents, the general contractor will provide hotel accommodation at a local hotel (Baymount by Wyndham Downtown Detroit or Comfort Inn Downtown) for an overnight stay at the general contractor's expense.

Retention – It is our belief that with the plan as specified above that the tenants will be pleased and happy with the rehabilitation of their home and therefore will remain a tenant of the property. It will be the Management Agent's responsibility to work with the tenants on a one

on one basis to eliminate any concern, discomfort or burden caused the rehabilitation of the property. The Regional Manager will contact any tenant who submits a notice to vacate and those who move-out during the rehabilitation period in an effort to retain all eligible households as a resident of Van Dyke Center.

As related party entities, the Owner, MHT Management, and MHT Construction will work diligently to provide a "like new" property when complete.

Marketing – MHT Management and MHT Housing have experienced with acquisition rehabs that nearly 100% of the tenants are retained or there are enough pending applications to fill any vacant units by the end of the construction period.

Utilities – From time to time it will be necessary for the contractor to use the utilities provided on site. Subcontractors will be encouraged to use generators as much as possible to limit the consumption of development or tenant paid utilities.

Development – The Contractor will reimburse the development for the cost of any utilities used for the rehabilitation of the property.

Tenants – The Contractor will reimburse the tenant for the cost of any utilities used for the rehabilitation of the property.

SUMMARY -

- ✓ It is the intent, desire and goal to have clear, concise and continual communications by and between the Owner, the Contractor, the Management Agent and the Residents.
- ✓ Units will be rehabilitated utilizing a plan to have tenants leave from their units for a period of 10-hours for 7 to 10 days while work is being completed in their unit.
- ✓ Tenants will be encouraged but not required to assist in the packing and/or moving of their household items to allow for the work to commence in their unit.
- ✓ All tenants will be required to take responsibility for their personal belongs as listed in this document.
- ✓ Retention of the current tenants is the goal of all parties involved in the rehabilitation of the property.
- ✓ Marketing of vacant units will follow the guidelines as established by MHT Management's marketing plan.
- ✓ The Contractor will be responsible for the payment of all relocation costs including packing, additional utilities and daily meal and lodging allowance fees.