

## **Executive Summary**

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

#### **1. Introduction**

Plymouth is a Community Development Block Grant (CDBG) Entitlement Grantee and a member of the Hennepin County Consortium, which includes suburban Hennepin County as well as the cities of Bloomington, Eden Prairie, and Plymouth. This document contains those sections of the Consortium Action Plan with information specific to the City of Plymouth and its CDBG programs. The City of Plymouth will utilize CDBG funds to achieve the goals that best serve the housing and community development needs of the City and the Hennepin County Consortium.

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

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

Plymouth will carry out activities that will provide for the preservation of the City's housing stock, improve housing affordability, provide essential social services, and support fair housing activities. The City will continue to provide 0% interest deferred loans for housing rehabilitation and first time homebuyers city-wide. The City will also provide capital funding to assist with the rehabilitation of special needs rental housing. Lastly, the City will provide CDBG funds to support social services and fair housing implementation.

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

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

The City of Plymouth has a long history of actively working to preserve and upgrade the condition of its housing, maintain housing affordability, and provide needed social services. The CDBG-funded single-family rehabilitation loan program (including lead-based paint abatement) and first time homebuyer loan program have been a very successful and important part of these efforts. Each year the City evaluates its performance relative to its Consolidated Plan goals through the Consolidated Annual Performance Evaluation Report (CAPER). For the past several years, the City has been on track to meet all of its Consolidated Plan goals.

Fair Housing continues to be a focus of the City of Plymouth. Past funding has provided for testing and other activities that are coordinated by the lead agency of the consortium, Hennepin County. The City, as part of the consortium, focuses this activity based upon the results of the Analysis of Impediments that is completed by the metro-wide efforts of the Fair Housing Implementation Council (FHIC) and has assisted in implementing the recommendations made in the approved Addendum to the Analysis of Impediments. The FHIC recently received RFP submissions from community agencies to assist in gathering information as to the needs of the community in relation to recommendations that were seen as important by community leaders. The addendum will continue to be a part of the work done by the City to ensure Fair Housing requirements are met throughout the year.

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

Summary from citizen participation section of plan.

As a part of the Hennepin County Consortium Action Plan, this Plan will be made available for public comment 30 days prior to going before the Hennepin County Board for a public hearing. In addition, prior to the County's hearing, the Plymouth Housing & Redevelopment Authority held a public hearing for approval of the Plymouth Action Plan and to receive public comments. The Consortium Action Plan provides the complete Citizen Participation Plan for all grantees to follow, including Plymouth.

The City of Plymouth Public Hearing was held on February 28, 2019. At the Public Hearing, no public comments were received. Five of the seven social service providers were present to provide support for the services that are being funded.

#### **5. Summary of public comments**

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

No public comments were received. The Notice of Public Hearing was submitted to the local newspaper as well as featured on the City of Plymouth website.

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

No comments were not accepted.

#### **7. Summary**

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

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

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

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	PLYMOUTH	Housing & Redevelopment Authority

**Table 1 – Responsible Agencies**

### **Narrative**

The City of Plymouth is a CDBG entitlement community. Plymouth is also a member of the HOME consortium of suburban Hennepin County. Therefore, the County serves as the lead agency in the overall development and submittal of the Consortium Consolidated Plan and Annual Action Plans for participating jurisdictions, including CDBG grantees.

### **Consolidated Plan Public Contact Information**

James Barnes, HRA Manager

3400 Plymouth Blvd Plymouth, MN

763-509-5412

[jbarnes@plymouthmn.gov](mailto:jbarnes@plymouthmn.gov)

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

### **1. Introduction**

The development of the Hennepin County Consortium Consolidated Plan is led by Hennepin County. Because many of the agencies that work within the city also work county-wide, it was determined that only one contact needed to be made with these organizations. The responses in this section reflect the work completed by Hennepin County and outlined in the overall Consortium Consolidated Plan as well as work completed by the City of Plymouth.

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

These activities are coordinated by Hennepin County at the local level. One of Hennepin County's services to enhance coordination include development of a unit to focus specifically on housing stability for all county clients. Their work is to develop strategies to enhance prevention, support, and development of housing to meet the needs of residents within the county. Additionally, the county works with the City of Plymouth to provide assistance through the Continuum of Care department which works with HOME funds and the Office to End Homelessness.

Where appropriate, staff refers organizations and services agencies to each other to coordinate efforts. The City of Plymouth coordinates with programs such as PRISM's Rapid Rehousing which helps to make emergency payments to keep residents in their homes for a short period of time as well as working with TreeHouse to address youth in unstable living situations. The City has a close relationship with Hennepin County and refers any resident that may have additional home or mental health needs to a network of people within the County that are equipped to address issues that may arise for the City of Plymouth. The City of Plymouth also works with residents through the public safety department and the code enforcement department to assist in getting residents the help they may need. The City also works with Interfaith Outreach to refer residents to their Neighborhood Program which helps to build healthy and connected neighborhoods that can assist one another.

The City of Plymouth HRA works to connect residents that may have housing issues with tenant advocacy groups such as HOMELine and HousingLink to help assist with finding housing that can accommodate the residents needs.

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

This coordination is completed by the Minneapolis/Hennepin County Continuum of Care and the Office to End Homelessness. If a resident of Plymouth is facing issues of homelessness, the City would first refer to the Coordinated Entry Program through Hennepin County to help assist with the resident's issues. Additionally, the City would contact our partnering agencies such as Interfaith Outreach's Neighborhood Program, PRISM's Rapid Rehousing Program, or possibly CAP-HC (formerly CAPSH) to assist with potential foreclosure counseling depending on the needs of the resident. Hennepin County Coordinated Entry works with agencies in the Northwest Metro such as CEAP, PRISM, and the YMCA depending on age of the resident as well as location that could also be used as a referral source. The City of Plymouth will work to contact the Continuum of Care staff at Hennepin County to assist with residents of Plymouth that are at risk of homelessness or have experienced homelessness.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

N/A- Plymouth is not a recipient of ESG funds.

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

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

1	<b>Agency/Group/Organization</b>	HOME Line
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Home Line was consulted through Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for legal advocacy services for low/moderate income tenant households in Plymouth and suburban Hennepin County. See narrative in AP-85
2	<b>Agency/Group/Organization</b>	Community Action Partnership of Hennepin County
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CAP-HC was consulted through Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for housing counseling for low/moderate income households in Plymouth and suburban Hennepin County. See narrative in AP-85.
3	<b>Agency/Group/Organization</b>	People Responding in Social Ministry
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	PRISM was consulted through Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for emergency housing assistance and homelessness prevention services for low/moderate income households in Plymouth and suburban Hennepin County. See narrative in AP-85.
4	<b>Agency/Group/Organization</b>	Hammer Residences
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	HAMMER Residences was consulted through Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for rehabilitated rental housing for low/moderate income households with development disabilities in Plymouth and suburban Hennepin County. See narrative in AP-85.
5	<b>Agency/Group/Organization</b>	Senior Community Services (SCS)
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	SCS was consulted through Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for household maintenance assistance for low/moderate income senior households in Plymouth and suburban Hennepin County. See narrative in AP-85.

6	<b>Agency/Group/Organization</b>	City of Plymouth
	<b>Agency/Group/Organization Type</b>	Housing PHA Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Housing Choice Voucher (HCV) Department(which acts as the PHA for the City of Plymouth) was consulted throughout the needs assessment and goal setting process for the Consolidated Plan. Additionally, HCV staff are consulted periodically to identify local housing needs. Staff will refer residents to HousingLink to assist with finding housing and anticipate higher outcomes of finding housing that fits their needs.
7	<b>Agency/Group/Organization</b>	Metropolitan Council - Metro HRA
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Plymouth and the Metropolitan Council regularly coordinate and communicate regarding economic/community development and affordable housing issues including coordination between the Housing Policy Plan and the Consolidated Plan. Goals in the Consolidated Plan generally overlap with Metropolitan Council affordable housing goals for cities.
8	<b>Agency/Group/Organization</b>	Office to End Homelessness
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-homeless Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders Foundation Neighborhood Organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Office to End Homelessness played a key role in the development of all housing and homeless-related sections of the Hennepin County Consortium Consolidated Plan. Coordination will continue throughout the plan. It is anticipated that this coordination will result in lower levels of homelessness and increased access to services throughout the metro area to assist residents experiencing homelessness or other housing related issues. The City of Plymouth works with the Office to End Homelessness by referring any residents that may be experiencing homelessness or issues related to homelessness to social service providers and Hennepin County for support.
9	<b>Agency/Group/Organization</b>	INTERFAITH OUTREACH COMMUNITY PARTNERS
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Interfaith Outreach was consulted through Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for homelessness assistance for low/moderate income households in Plymouth and suburban Hennepin County. See AP-85 narrative.

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

Plymouth was actively involved in the Consortium consultation, development, and citizen participation process led by Hennepin County for the 2015-2019 Consolidated Plan. All agency types were consulted through the Consortium's Consolidated Plan development and goal-setting process. For this Action Plan, which is the fifth annual Action Plan in the 2015-2019 Consolidated Plan cycle, some agency types were consulted again in order to assess whether substantial trends or changes had occurred since the Consolidated Planning process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Hennepin County	The Plymouth CDBG Action Plan identified homelessness prevention activities as important goals. This includes direct homelessness prevention housing assistance as well as foreclosure prevention counseling and tenant advocacy to prevent eviction.
Comprehensive Plan	City of Plymouth	The Plymouth CDBG Action Plan has significant overlap with the Plymouth Comprehensive Plan. In particular, both the CDBG Action Plan and the Housing section of the Comprehensive Plan identify several goals related to providing affordable and well-maintained housing that is accessible for all income levels, household types, and life cycle stages.
Metropolitan Council	Metropolitan Council	The Plymouth CDBG Action Plan has overlap with the Housing Policy Plan. Both plans identify priorities related to maintaining existing affordable housing stock and providing a mix of affordable housing options for households of all life stages and economic means.

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

## **Narrative**

The Plymouth CDBG program attempts to address the widest range of needs possible despite limited resources. The Action Plan identifies a variety of goals to promote housing affordability, provide suitable and well-maintained housing, and accessibility to needed social services. These goals were developed in consultation with numerous public, non-profit, and private sector partners and agencies during the 2015-2019 Consolidated Plan process and throughout the annual Action Plan processes.

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

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

The City of Plymouth is part of the Hennepin County Consortium, and therefore the City's Action Plan is part of the Hennepin County Consortium Action Plan. The City has a Citizen Participation Plan that mirrors Hennepin County's and other Consortium members Citizen Participation Plans, which calls for the Hennepin County Consortium Action Plan to be available for public comment 30 days prior its submission to HUD.

In addition to public hearings conducted by the County Board, the City of Plymouth held a public hearing to receive comments regarding the annual projects and activities to be funded. The Plymouth Housing and Redevelopment Authority held a public hearing on February 28, 2019 and asked the public to comment on the proposed activities. Notice of the public hearing was published in the official City newspaper as well as on the City website. The City of Plymouth holds the public hearing at times and locations convenient to potential and actual beneficiaries. For future action plans, the City of Plymouth may utilize social media to provide information about public hearings and the Action Plan process.

Technical assistance is provided to any group, representing very low and low-income persons that want to develop funding proposals for any of the programs covered by the Action Plan. The City of Plymouth meets regularly with concerned agencies and groups to review and discuss affordable housing efforts and to identify ways in which the City of Plymouth can better serve the entire community with our resources including CDBG funding.

Plymouth will consider any future comments received from the public during the 5-year Consolidated Plan period, either informally or through the formal citizen participation process associated with each Annual Action Plan. All comments received will be evaluated by staff, and amendments to the goals of the Plan will be considered if warranted. Any resulting changes to Plan goals would be made in accordance with the procedures outlined in the City's Citizen Participation Plan.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Five of the seven social service agencies were present at the HRA Board meeting. They all spoke in favor of the Action Plan.	All comments were from the sub-grantees and were in favor of the Action Plan.	No comments were not accepted.	
2	Newspaper Ad	Non-targeted/broad community	No comments were received in response to the published legal notice	No comments were received in response to the published legal notice	No comments were not accepted	
3	Internet Outreach	Non-targeted/broad community	No comments were received in response to postings to the City of Plymouth website.	No comments were received in response to postings to the City of Plymouth website.	No comments were not accepted.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	270,798	50,000	0	320,798	0	For the 2019 CDBG program year, Plymouth anticipates a CDBG allocation of \$270,798. Additionally, \$50,000 of program income is anticipated. If the allocation amount is higher or lower than the anticipated figure, Plymouth will proportionally increase or decrease either First Time Homebuyer, Affordable Housing Development, or Housing Rehabilitation Loan programs accordingly to match actual allocation amounts.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
LIHTC	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	0	0	0	0	0	The HRA has been working with several private developers to utilize this resource to create new affordable apartment units. The HRA will continue to pursue opportunities to use LIHTC when possible.
Section 8	public - federal	Admin and Planning Housing	0	0	0	0	0	Currently the Plymouth HRA has funding for 225 vouchers (including 30 vouchers for non-elderly disabled). There are another 111 voucher holders residing in Plymouth who ported in from other jurisdictions.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Tax Exempt Bond Proceeds	public - local	Housing	0	0	0	0	0	Since 1995, the City has issued \$58,795,000.00 in tax-exempt housing revenue bonds and \$7,290,000.00 in taxable housing revenue bonds for the acquisition, re-financing and/ or renovation of 893 rental apartments. The City required that the owners make a certain percentage of their units affordable to and occupied by low-income households or make an annual payment for the life of the bonds to the HRA's Affordable Housing Account. As a result, 220 of these units are affordable to low-income renters.

Tax Increment Financing	public - local	Housing							The City's Tax Increment Housing Assistance Program (TIHAP) makes excess Tax Increments from existing and future Tax Increment Districts in the City available for eligible affordable housing developments. Of the funds received to date, the City has allocated \$236,000.00 to the Stone Creek Village apartment complex. In 2006 the City created a TIF Housing District to assist Common Bond communities with their development of Vicksburg Commons. In 2010, the City approved a loan of \$600,000.00 to the Westview Estates project. This project provides 67 workforce housing units assisting households at or below 60% of the area median income. In 2011, the City created a TIF District to support a 157-unit mixed income apartment development. The Axis opened in 2016 and includes 16 workforce housing units for up to 60% AMI. The City will consider the creation of additional TIF districts as appropriate to assist affordable housing projects as necessary to supplement outside funding.
			0	0	0	0	0	0	
Other	private	Housing Public Services							Interfaith Outreach and Community Partners: This non-profit organization has been very supportive of all efforts in
			0	0	0	0	0	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
								Plymouth of furthering affordable housing initiatives. Interfaith Outreach also has a significant housing fund to assist in funding affordable housing efforts.
Other	public - state	Housing	0	0	0	0	0	Minnesota Housing Finance Agency (MHFA): This agency provides first time homebuyer programs, housing rehabilitation programs, and development and redevelopment financing through their Consolidated RFP process. The HRA also developed a partnership in 2003 with the Center for Energy and Environment (CEE) pertaining to the MHFA Fix-Up Fund and MHFA Deferred Loan Program. While CEE remains the approved lender for the Fix-Up Fund, the HRA works in collaboration with them in marketing the program.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - local	Economic Development	0	0	0	0	0	Plymouth Economic Development Fund: The Fund was capitalized from the first \$100,000.00 in principal plus interest to be paid by Value Rx in repayment of a loan from the Minnesota Department of Employment and Economic Development (DEED) Economic Recovery Program (ERP). The Plymouth Economic Development Fund (PEDF) allows the HRA to provide loans at favorable terms for business activities in the City that could create new jobs, increase the tax base, or leverage other needed economic development funds. The City has issued one loan for \$180,000.00 to a company that relocated its headquarters to Plymouth.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - local	Housing	0	0	0	0	0	HRA Tax Levy: The HRA has used this levy for several years to provide subsidized rental housing for 195 senior citizen households utilizing approximately \$278,000.00 annually to eligible renters at Plymouth Towne Square and Vicksburg Crossing. An additional \$303,000.00 is utilized for the funding, administration and supervision of the HRA and City affordable housing programs. Additionally, in January 2016, the HRA approved a supplemental allocation of \$150,000 for the Housing Rehabilitation Loan Program to allow continued operation of the program to when CDBG funds are not available.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The HRA intends to pursue all possible resources to address its Action Plan goals. There are no specific matching requirements associated with Plymouth's CDBG program, although any opportunities to provide/obtain matching funding will be pursued. For example, clients of the Housing Rehabilitation Loan program are occasionally able to match their Plymouth CDBG loan with grants or loans from other programs, such as for lead abatement.

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

The City of Plymouth owns two senior rental housing developments. Plymouth Town Square, developed in 1994, has provided 99 affordable housing units / subsidized senior housing units through an annual amount of Plymouth HRA tax levy ranging from \$215,000.00 to \$320,000.00. By providing a deep subsidy, the HRA is working to help the residents at PTS obtain decent, affordable housing and to avoid homelessness. The 2017 occupancy averaged 97%. Vicksburg Crossing, built in 2006 with 96 units, offers affordable rents to low and moderate income residents. The HRA Board sets rents on an annual basis. A subsidy of \$18,000-\$60,000 from the HRA tax levy helps keep rent levels affordable. The occupancy for 2017 averaged 98.5%.

**Discussion**

The City of Plymouth utilizes a variety of federal, state, and local funding sources to meet the goals identified in this plan. This includes sources used on a recurring annual basis such as CDBG, Section 8, state housing agency programs, and the local HRA tax levy. Additional sources such as LIHTC, TIF, and housing revenue bonds have been used on a case by case basis in the past and will continue to be pursued when and where appropriate.

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeowner rehabilitation assistance	2015	2019	Affordable Housing		Preserve/Create Single Family Homeownership	CDBG: \$142,892	Homeowner Housing Rehabilitated: 9 Household Housing Unit
2	Direct homebuyer assistance	2015	2019	Affordable Housing		Preserve/Create Single Family Homeownership	CDBG: \$47,363	Direct Financial Assistance to Homebuyers: 4 Households Assisted
3	Rental housing rehabilitation	2015	2019	Affordable Housing Non-Homeless Special Needs		Preserve/Create Multifamily Rental Opportunities	CDBG: \$40,000	Rental units rehabilitated: 3 Household Housing Unit
4	Homeowner education	2015	2019	Non-Housing Community Development		Education, outreach, and services	CDBG: \$4,000	Public service activities other than Low/Moderate Income Housing Benefit: 59 Persons Assisted
5	Senior services	2015	2019	Non-Housing Community Development		Education, outreach, and services	CDBG: \$10,000	Public service activities other than Low/Moderate Income Housing Benefit: 60 Persons Assisted
6	Youth services	2015	2019	Non-Housing Community Development		Education, outreach, and services	CDBG: \$10,000	Public service activities other than Low/Moderate Income Housing Benefit: 65 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Homelessness prevention	2015	2019	Non-Housing Community Development		Education, outreach, and services	CDBG: \$23,900	Public service activities other than Low/Moderate Income Housing Benefit: 12 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 3 Households Assisted
8	Tenant counseling	2015	2019	Non-Housing Community Development		Education, outreach, and services	CDBG: \$8,230	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted
9	Fair Housing	2015	2019	Fair Housing		Education, outreach, and services	CDBG: \$5,000	

**Table 6 – Goals Summary**

## Goal Descriptions

1	Goal Name	Homeowner rehabilitation assistance
	Goal Description	Provide zero interest loans and grants to assist low/moderate income households to make needed home repairs and address lead based paint issues as needed.
2	Goal Name	Direct homebuyer assistance
	Goal Description	Provide zero interest deferred loans to low/moderate income first time homebuyer households to help make the purchase of a home more affordable.

3	<b>Goal Name</b>	Rental housing rehabilitation
	<b>Goal Description</b>	Rehabilitate rental housing units and group homes operated by non-profit agencies for low/moderate income adults with developmental disabilities.
4	<b>Goal Name</b>	Homeowner education
	<b>Goal Description</b>	Provide homeownership, foreclosure prevention, and reverse mortgage counseling services for low/moderate income households.
5	<b>Goal Name</b>	Senior services
	<b>Goal Description</b>	Provide household maintenance assistance to low/moderate income senior households.
6	<b>Goal Name</b>	Youth services
	<b>Goal Description</b>	Provide assistance for youth counseling and group sessions for low/moderate income at-risk youth.
7	<b>Goal Name</b>	Homelessness prevention
	<b>Goal Description</b>	Provide emergency, short-term housing assistance to low/moderate income households experiencing temporary financial crises.
8	<b>Goal Name</b>	Tenant counseling
	<b>Goal Description</b>	Provide counseling and legal advocacy to low/moderate income renter households.
9	<b>Goal Name</b>	Fair Housing
	<b>Goal Description</b>	Assist in regional efforts to further fair housing, including evaluation and implementation activities.

## **AP-35 Projects - 91.420, 91.220(d)**

### **Introduction**

The Plymouth HRA will implement the following activities during the program year in order to address the strategies and priorities of the 2015-2019 Consolidated Plan.

#	Project Name
1	Housing Rehabilitation
2	First Time Homebuyer Assistance
3	Affordable Rental Housing Rehabilitation
4	Homeownership Counseling
5	Tenant Counseling
6	Youth Services
7	Senior Services
8	Homelessness Prevention
9	Homelessness Prevention
10	Fair Housing
11	Program Administration

**Table 7 – Project Information**

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

The allocation priorities above were established based on the priorities and needs identified in the 2015-2019 Consolidated Plan. An effort was made to address a broad range of needs that have been identified in the City while accounting for the reality of limited funding. Obstacles to addressing underserved needs include an overall limited availability in funding as well as regulatory limitations regarding how funds can be used. For example, regulations limit the amount of CDBG funds which may be used for public services to no more than 15% of the grant amount plus program income. Recommendations for funding are based on previous years expenditures and addressing the priorities and needs of the citizens of the City of Plymouth.

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	Housing Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homeowner rehabilitation assistance
	<b>Needs Addressed</b>	Preserve/Create Single Family Homeownership
	<b>Funding</b>	:
	<b>Description</b>	The Plymouth HRA offers two programs to assist low/moderate-income homeowners rehabilitating their homes. The Housing Rehab Loan Program offers deferred zero interest loans to homeowners for needed home repairs up to \$40,000. The Emergency Repair Grant Program provides grants of up to \$5,000 for emergency/urgent home repairs for seniors.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	During the 2019 program year, the City of Plymouth expects to assist 9 households with housing rehabilitation. Six will receive housing rehabilitation loans and three households will receive emergency repair grants.
	<b>Location Description</b>	The program is available to residents city-wide that are of low/moderate-income households.
2	<b>Planned Activities</b>	The HRA will continue to operate two housing rehabilitation programs; the Housing Rehab Loan Program and the Emergency Repair Grant Program. The Housing Rehab Loan Program offers 0% interest deferred loans of up to \$30,000 for low and moderate-income homeowners to rehabilitate their owner-occupied homes. An additional \$10,000 (max \$50,000) is available for households in need of accessibility improvements for disabled residents and/or lead paint hazard reduction. Applications accepted year-round on a first-come first-serve basis. The loans must be repaid only if the property is sold or transferred within 20 years. Loan funds may be used for qualifying safety and energy efficiency upgrades, which may include repairing or replacing roofing, siding, windows, electrical, plumbing, heating, and insulation. Other repairs may also be eligible as determined by an inspection of the home.
	<b>Project Name</b>	First Time Homebuyer Assistance
	<b>Target Area</b>	
	<b>Goals Supported</b>	Direct homebuyer assistance
	<b>Needs Addressed</b>	Preserve/Create Single Family Homeownership

	<b>Funding</b>	:
	<b>Description</b>	This program provides direct homeownership assistance to low and moderate-income first time homebuyers who wish to buy a single-family home, condo, cluster home, or townhouse in the City of Plymouth. The programs provides financial assistance to eligible families through 0% interest deferred loans of up to \$35,000.00 to pay for eligible closing costs, up to 50% of the required down payment and a portion of the mortgage principle reduction.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The HRA expects to assist four households with direct homeownership during the program year.
	<b>Location Description</b>	The program is available city-wide to low/moderate-income households purchasing their first home. The home being purchased may be located anywhere within the City of Plymouth. The households purchasing the home is not required to have resided in the City of Plymouth prior to purchasing the home.
	<b>Planned Activities</b>	The program provides assistance to low and moderate income first time homebuyers who wish to buy a single-family home, condo, cluster home, or townhouse in Plymouth. The program provides financial assistance to eligible families through 0% interest deferred loans of up to \$35,000.00 to pay for eligible closing costs, up to 50% of the required down payment and a portion of the mortgage principle reduction. Applications are accepted throughout the year on a first-come, first-serve basis. Loans must be repaid if the property is sold, transferred, non-homesteaded, or 30 years from the initial purchase date, when the mortgage becomes due and payable. Due to a tight housing market within the City of Plymouth, there is expected carryover that will be used to help fund the program through the 2019 program year, as well as a small amount of funding from the 2019 allocation.
<b>3</b>	<b>Project Name</b>	Affordable Rental Housing Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Rental housing rehabilitation
	<b>Needs Addressed</b>	Preserve/Create Multifamily Rental Opportunities
	<b>Funding</b>	:

	<b>Description</b>	Assist with the rehabilitation of three affordable rental homes operated by Hammer Residences. Hammer Residences provides housing and support to individuals who have developmental disabilities. The projects will support housing for these individuals through necessary updates.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Four low/moderate-income individuals currently reside in the home that will be rehabilitated and modified for aging in place during the program year.
	<b>Location Description</b>	Three Hammer residences within the City of Plymouth will be rehabilitated. Those homes are: "14th Ave.", "McGlinch", and "Tyler".
	<b>Planned Activities</b>	Assist with the rehabilitation and accessibility modifications of three rental homes operated by Hammer Residences. Hammer Residences provides housing and support to individuals who have developmental disabilities. The HRA will provide funds to install rubber treads on stairs and security updates. A bathroom in one of the homes will be expanded to provide greater accessibility, and other modifications will be made to all of the homes as needed including new flooring and concrete ramp repairs for greater walker/wheelchair accessibility, driveway replacement to support the wear and tear from an accessible lift van, and necessary updates to plumbing.
4	<b>Project Name</b>	Homeownership Counseling
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homeowner education
	<b>Needs Addressed</b>	Education, outreach, and services
	<b>Funding</b>	:
	<b>Description</b>	Community Action Partnership of Hennepin County (CAP-HC) will provide homebuyer education, foreclosure prevention, reverse mortgage, and other homeowner counseling services to homeowner and/or potential homebuyer households in Plymouth.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	CAP-HC expects to assist 59 Plymouth households with housing counseling services during the program year.

	<b>Location Description</b>	CAP-HC housing counseling services are available to Plymouth residents city-wide.
	<b>Planned Activities</b>	CAP-HC will provide homebuyer education, foreclosure prevention, reverse mortgage, and other homeowner counseling services to 59 households in Plymouth. Services are available year round. Clients are issued a worksheet/budget form that demonstrates their assets and liabilities. Proof of income letters, pay stubs, W-2s, and account statements are all used to gather relevant client information.
<b>5</b>	<b>Project Name</b>	Tenant Counseling
	<b>Target Area</b>	
	<b>Goals Supported</b>	Tenant counseling
	<b>Needs Addressed</b>	Education, outreach, and services
	<b>Funding</b>	:
	<b>Description</b>	HomeLine offers a tenant advocacy hotline, tenant organizing for preservation of affordable housing, and tenant education services available to all Plymouth residents.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	200 Plymouth renter households will be assisted through the tenant hotline.
	<b>Location Description</b>	
	<b>Planned Activities</b>	The program is available city-wide to renter households in Plymouth.
<b>6</b>	<b>Project Name</b>	Youth Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Youth services
	<b>Needs Addressed</b>	Education, outreach, and services
	<b>Funding</b>	:
	<b>Description</b>	Family Hope Services TreeHouse Program helps at-risk teenagers by providing year-round counseling, support and other programs for youth at no charge to the participants. 65 low to moderate-income Plymouth youth will be served. Clients are required to create a welcome to TreeHouse form that contains information on gender, age, race & ethnicity, address and financial information.

	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TreeHouse expects to serve 65 youth from the City of Plymouth with CDBG funding during the 2019 program year.
	<b>Location Description</b>	The TreeHouse program is available to Plymouth youth city-wide. Free transportation to and from the Plymouth TreeHouse location is provided to participants that need it.
	<b>Planned Activities</b>	TreeHouse helps at-risk teenagers by providing year-round counseling, support, and other programs for youth at no charge to the participants. Clients are required to complete a welcome to TreeHouse form that contains information on gender, age, race & ethnicity, address, and financial information.
7	<b>Project Name</b>	Senior Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Senior services
	<b>Needs Addressed</b>	Education, outreach, and services
	<b>Funding</b>	:
	<b>Description</b>	Senior Community Services will provide low to moderate income seniors in the City of Plymouth with maintenance services through the H.O.M.E (Housing Outside Maintenance for the Elderly) Program. This will allow the seniors to stay in their homes with dignity and safety by providing homemaking, grab bars & other safety installations, minor repairs, exterior home maintenance, interior and exterior painting, yard work, lawn mowing, and snow removal on a sliding fee scale based on income.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	60 low income seniors will benefit from this funding.
	<b>Location Description</b>	All seniors who are residents of the City of Plymouth are able to access funding.

	<b>Planned Activities</b>	Senior Community Services will provide low/moderate income seniors in the City of Plymouth with maintenance services through the H.O.M.E (Housing Outside Maintenance for the Elderly) Program. This will allow the seniors to stay in their homes with dignity and safety by providing homemaking, grab bars & other safety installations, minor repairs, exterior home maintenance, interior and exterior painting, yard work, lawn mowing, and snow removal on a sliding fee scale based on income. Clients are required to complete a H.O.M.E Service Request form that contains gender, race & ethnicity, address and monthly income information. Proof of income letters, pay stubs, W-2s and social security and account statements are all used to gather relevant client information.
8	<b>Project Name</b>	Homelessness Prevention
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homelessness prevention
	<b>Needs Addressed</b>	Education, outreach, and services
	<b>Funding</b>	:
	<b>Description</b>	People Responding in Social Ministry (PRISM) will provide short-term (up to three months) housing subsistence payments on behalf of low/moderate-income persons living in the City of Plymouth in order to help prevent homelessness. Assistance may include utility payments to prevent cutoff of service and rent/mortgage payments to prevent eviction or foreclosure.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	PRISM expects to help 12 Plymouth households with homelessness prevention during the program year.
	<b>Location Description</b>	The program is available to low/moderate-income residents city-wide.
	<b>Planned Activities</b>	People Responding In Social Ministry (PRISM) will provide short-term (up to three months) housing subsistence payments on behalf of low/moderate income persons living in the City of Plymouth in order to help prevent homelessness. Assistance may include utility payment to prevent cutoff of service and rent/mortgage payments to prevent eviction or foreclosure. Clients are required to provide proof of income through paystubs, bank statements, tax returns or other forms. The program will be available to low/moderate income residents city-wide.

9	<b>Project Name</b>	Homelessness Prevention
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homelessness prevention
	<b>Needs Addressed</b>	Education, outreach, and services
	<b>Funding</b>	:
	<b>Description</b>	Interfaith Outreach and Community Partners will provide direct assistance to clients within their Project Success program. The participants are expected to be working towards an educational degree or other goal within two years while paying 30% of their rent.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Interfaith Outreach expects to help three families within their Project Success program.
	<b>Location Description</b>	The program is available to city-wide low/moderate-income households.
10	<b>Planned Activities</b>	Interfaith Outreach and Community Partners will provide direct assistance to clients within their Project Success program. The participants are expected to be working towards an educational degree or other goal within two years while paying 30% of their rent.
	<b>Project Name</b>	Fair Housing
	<b>Target Area</b>	
	<b>Goals Supported</b>	Fair Housing
	<b>Needs Addressed</b>	Education, outreach, and services
	<b>Funding</b>	:
	<b>Description</b>	Plymouth supports the Fair Housing activities of the Hennepin County Consortium and the Twin Cities Fair Housing Implementation Council (FHIC). Activities include outreach, education and enforcement activities. The project includes evaluation and monitoring of implemented activities.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A - Supports Fair Housing activities covering Hennepin County and the Twin Cities metro area, including within the City of Plymouth.
	<b>Planned Activities</b>	Plymouth supports the Fair Housing activities of the Hennepin County Consortium and the Twin Cities Fair Housing Implementation Council (FHIC). Activities include outreach, education, and enforcement activities. The project includes evaluation and monitoring of implemented activities.
11	<b>Project Name</b>	Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	Provides for: 1) Oversight, management, monitoring and coordination of the CDBG program. 2) Public information on CDBG Program activities available to all City residents.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A - Funding provides for the overall program administration for CDBG activities.
	<b>Location Description</b>	N/A - Funding provides for the overall program administration for CDBG activities.
	<b>Planned Activities</b>	Program management, monitoring, and evaluation of overall CDBG program, including the costs of staff engaged in program management.

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

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

The HRA CDBG programs will be available to low/moderate income households city-wide and will not be geographically targeted.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>

**Table 8 - Geographic Distribution**

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

Investments are not targeted geographically but are instead available to low/moderate income households city-wide. Investments are not targeted geographically because the City of Plymouth has no areas of concentrations of low/income or minority households nor any areas of concentrations of housing problems. This policy allows the City to serve as many low/moderate income households as possible throughout all areas.

### **Discussion**

All qualifying low/moderate income residents residing within the City of Plymouth are able to receive assistance through the Plymouth CDBG programs.

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

### **Introduction**

The City of Plymouth works whenever possible to assist with making housing affordable through programs offered by the City including the Rehabilitation and Emergency Programs for repairs, the First Time Homebuyer Program for new homeowners as well as through social service funding to assist with housing costs and maintenance.

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

The City is addressing affordable housing barriers in a variety of ways including the support of new affordable housing developments, entry cost assistance to first time homebuyers, tenant and homeowner education and support services, and rehabilitation assistance. The City is closely involved with researching and addressing impediments to fair housing. The City uses some of its CDBG funding to support HOME Line, a tenant advocacy and hotline organization. Finally, the City works with and supports developers to include affordable housing in their developments.

### **Discussion**

The City will continue to support currently operating programs as well as participating in regional opportunities to address affordable housing issues. The City will continue to assist with making housing affordable citywide.

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

### **Introduction**

Despite limited funding, the Plymouth CDBG program is designed to meet a wide range of needs, including assisting social services, affordable housing, and reducing lead-based paint hazards. The City works with a variety of public, non-profit, and private industry partners to accomplish its community development goals, both through the CDBG program and through other resources. Through a constant continuation of contact with our subgrantees, we were able to identify that there is still a need for tenant services and tenant advocacy, a rising need for funding to senior aging in place services due to rising demand and client volume, a steady continuum of youth services was identified through TreeHouse services, and PRISM has a continued need for rapid rehousing services as well as community services such as the food shelf. The City of Plymouth will be working with Interfaith Outreach to assist with a program related to education and employment through housing assistance, and will assist CAP-HC with additional existing programs to supplement assisting homeowners and potential homebuyers with counseling and outreach.

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

The City will continue to identify obstacles, such as lack of affordable housing, to unmet and underserved community needs and support the goals established in the 2015-2019 Consolidated Plan. The City's approach to meeting these affordable housing needs is to assist renters in purchasing homes by providing down payment and closing cost assistance combined with counseling and education to low to moderate income families. In order to preserve the affordable housing stock "Restrictive Covenants" have been placed on a number of new units built. These Restrictive Covenants run with the land for a period of 20 years and contain restrictions on the transfer of the property only to someone who is a low to moderate income resident. To preserve and expand the supply of decent, safe, and affordable housing, the City will provide financial assistance for rehabilitation and repair of owner-occupied units to low to moderate income families.

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

The portion of 2019 CDBG funds allocated to the Housing Rehabilitation Program allows low-income homeowners to stay in current housing while allowing the City to maintain a stable affordable housing base. The City and HRA make every effort to create affordable rental and owner-occupied housing opportunities as well as provide provisions that new developments remain affordable for years to come.

Although not funded with CDBG, the City has required an annual inspection of residential rental properties since 1994 to determine Code compliance and health or safety violations that need correction. This program ensures that rental properties are well maintained and that no substandard rental units are licensed in the City. The City Building Inspection Department currently inspects multi-

family rental properties annually and single-family rental properties every three years.

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

As part of the City's Rental Housing Licensing Program, all rental properties in the City are inspected at least every three years. The inspector has satisfied HUD's Risk Assessment Course and is a Certified Risk Assessor. All participants in the Housing Rehabilitation, First Time Homebuyer and Section 8 Programs, who reside or purchase housing that was built before 1978, receive copies of the EPA brochure "Protect Your Family From Lead In Your Home".

The Plymouth HRA has incorporated procedures in the guidelines for all federally funded programs to meet the requirements of the federal lead-based paint regulations. Discussion of the Lead-Based Paint (LBP) requirements take place at the initial meeting with HRA staff and the Certification of Receipt of LBP information is signed by the applicant and kept in the applicant's file. If deteriorated paint is found in a home built before 1978 and lead hazard reduction work may be needed because painted surfaces will be disturbed during rehabilitation, the appropriate level of lead testing and other actions are initiated. The HRA contracts with a certified Risk Assessor to perform the necessary tests to determine if and where there is a lead hazard risk. The Assessment report identifies the presence and location of LBP and the areas that need to be addressed. If LBP is found, the homeowner is notified. As a condition of receiving funding, LBP hazards must be addressed and lead safe work practices are required for all rehabilitation work that disturbs painted surfaces. Appropriate lead hazard reduction measures are also incorporated into the Scope of Improvements. Clearance of the unit is required and a copy of the clearance report is given to the homeowner and kept in the homeowner's file.

The above lead-based paint control actions enable the City of Plymouth to abate lead issues and be in full compliance with the Federal Lead-Based Paint rules.

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

Through its various programs, the City of Plymouth will identify and assist people and families that are below the poverty level when possible. We will utilize our network of social service agencies and where applicable assist them through CDBG resources and programs as well as local programs offered through the City of Plymouth, the Plymouth HRA and local non-profits. Programs that the City of Plymouth works with include tenant advocacy through HOMELine, a Rapid Rehousing Program through PRISM that helps assist with making mortgage or rent payments for a short period of time, a housing and educational program through Interfaith Outreach that helps with paying rent while a resident goes through a schooling or workforce development program to become more self-sufficient and earn higher wages, and housing and financial counseling through CAP-HC that assists with helping families make good financial decisions that will reduce poverty. CAP-HC also participates in a savings program that rewards clients that save with a \$3-\$1 match to help boost savings for things like a home downpayment or schooling expenses. Senior Community Services helps lower income seniors with needed home

maintenance through their HOME program by assisting with small handyman projects as well as yard maintenance to assist with aging in place especially for homeowners that own their home. TREEHouse gives resident youth a safe place and assists with programs to further education and assist homeless youth.

PRISM and Interfaith Outreach can also assist with basic needs through their food shelf and clothing programs that provide items to families that may be experiencing poverty and need these items for basic living.

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

The City of Plymouth has and will continue to coordinate with other institutions in the delivery of housing and community development programs. When possible, the City seeks to leverage its CDBG funds by coordinating with other state and local programs. For example, Plymouth has coordinated with Hennepin County to obtain Healthy Homes grant funding for lead-based paint hazard reduction for clients using our CDBG Housing Rehabilitation Loan Program. This allows households to remove lead-based paint hazards from the home while utilizing the CDBG funding to make other needed repairs, resulting in a greater impact to the living environment for the household.

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

The City of Plymouth has developed and continues to maintain strong collaborative relationships with other housing providers and social service agencies. The City has worked over the years to develop handicap accessible housing units with People Responding In Social Ministry (PRISM), Metropolitan Interfaith Council on Affordable Housing (MICA), Interfaith Outreach, and Habitat for Humanity.

The HRA requires recipients of their First Time Homebuyer Programs to attend homebuyer workshops presented by CAP-HC or other accredited Home Stretch workshops. CAP-HC seeks to assist lower-income households by providing them with comprehensive homeownership training and financial counseling. At the end of the training period, the family is able to purchase the home.

### **Discussion**

The City of Plymouth uses all available resources through the City, County, and state to assist homeowners and renters within the City. Any time that the City of Plymouth is alerted to a resident with housing needs, the response is to coordinate with other departments and agencies to assist that resident.

## Program Specific Requirements

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

#### Introduction

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	50,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>50,000</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	92.00%

## Discussion

Program income (PI) is occasionally received through the repayment of deferred zero interest loans made in previous years through the First Time Homebuyer and Housing Rehabilitation programs. When PI is received it is typically immediately reprogrammed to support current First Time Homebuyer and Housing Rehabilitation loan activities (depending on where the need/activity is greatest at the time the PI is received). The receipt of PI is somewhat unpredictable as it is generally triggered when previous loan recipients sell or refinance their homes. All PI received to date has been reprogrammed to support First Time Homebuyer and Housing Rehabilitation activities during the 2018 program year. The HRA anticipates receiving approximately \$50,000 in PI during the 2019 program year that will be reprogrammed to support projects during the program year. This estimate is based on loan repayment trends over the past five years.

The HRA does not have any funds or proceeds from section 108 loan guarantees, surplus funds, grant funds returned, or float-funded activities. The HRA also does not have any CDBG-assisted activities which qualify under the "urgent need" National Objective.

The HRA estimates that 92% of its CDBG funds will be used for activities that benefit persons of low and moderate income. This includes all of the HRA CDBG-assisted activities other than Program Administration (planning, management, monitoring, and evaluation of the overall CDBG program).

## Attachments

## Citizen Participation Comments

### AFFIDAVIT OF PUBLICATION

STATE OF MINNESOTA ) ss  
COUNTY OF HENNEPIN

Darlene MacPherson being duly sworn on an oath, states or affirms that he/she is the Publisher's Designated Agent of the newspaper(s) known as:

SS Wayzata/Plymouth

with the known office of issue being located in the county of:

HENNEPIN

with additional circulation in the counties of:

HENNEPIN

and has full knowledge of the facts stated below:

(A) The newspaper has complied with all of the requirements constituting qualification as a qualified newspaper as provided by Minn. Stat. §331A.02.

(B) This Public Notice was printed and published in said newspaper(s) once each week, for 1 successive week(s); the first insertion being on 01/24/2019 and the last insertion being on 01/24/2019.

### MORTGAGE FORECLOSURE NOTICES

Pursuant to Minnesota Stat. §580.033 relating to the publication of mortgage foreclosure notices: The newspaper complies with the conditions described in §580.033, subd. 1, clause (1) or (2). If the newspaper's known office of issue is located in a county adjoining the county where the mortgaged premises or some part of the mortgaged premises described in the notice are located, a substantial portion of the newspaper's circulation is in the latter county.

By: D. MacPherson  
Designated Agent

Subscribed and sworn to or affirmed before me on 01/24/2019 by Darlene MacPherson.

[Signature]

Notary Public



### Rate Information:

(1) Lowest classified rate paid by commercial users for comparable space:

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### CITY OF PLYMOUTH PUBLIC HEARING ON 2019 FUNDING FOR THE CITY OF PLYMOUTH'S COMMUNITY DEVELOPMENT BLOCK GRANT

On Thursday, February 28, 2019 at 7:00 a.m. at the Plymouth City Hall, 8400 Plymouth Blvd. North, Plymouth, Minnesota, the Plymouth Housing and Redevelopment Authority (HRA) will hold a public hearing to receive comments from the public as to the use of Community Development Block Grant (CDBG) funding the City anticipates receiving from the U.S. Department of Housing and Urban Development for the Program Year beginning July 1, 2019 and ending June 30, 2020. The HRA Commissioners will consider the comments made prior to and during this meeting when formulating their recommendations for the Plymouth City Council meeting on Tuesday, March 12, 2019. Funded activities will be available citywide. Please contact Jim Barnes at 763-808-5413 or [jimbarnes@plymouthmn.gov](mailto:jimbarnes@plymouthmn.gov) for more detailed information.

Published in the  
Sun Sailor  
January 24, 2019  
880635



## Citizen Participation Comments

← → ↻ 🏠 https://www.plymouthmn.gov/departments/community-development/housing

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## Housing

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The Housing Division serves as the liaison to the Plymouth [Housing and Redevelopment Authority \(HRA\)](#). The HRA is an independent governmental entity created by the City Council.

Money from the Community Development Block Grant program funds the city's [first-time homebuyer program](#), owner-occupied [rehabilitation program](#), and [emergency home repair program for seniors](#). CDBG also provides funding for a number of [social services partners](#), as described in the current [Hennepin County Consortium CDBG Action Plan](#). Additionally, the Housing Division administers the federal [Section 8 rent assistance](#) program and owns and operates two [senior housing](#) facilities.

View a list of [Publicly Subsidized and Naturally Occurring Affordable Housing \(NOAH\) Multi-Family Properties](#) (PDF).

The Housing Division works with residents, building owners and developers to assist in providing a broad range of housing options in the city. The division promotes and contributes to the economic health of the community through the creation and maintenance of affordable, life-cycle housing and active participation in the city's development and redevelopment processes.


### Studies and Updates

**2019 Draft CDBG Action Plan**  
[View the draft action plan](#) (PDF)

**2018 Plymouth Rental Housing Study Now Available**  
[View the rental housing study](#) (PDF)

## Citizen Participation Comments


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## Housing

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The Housing Division serves as the liaison to the Plymouth [Housing and Redevelopment Authority \(HRA\)](#). The HRA is an independent governmental entity created by the City Council.

Money from the Community Development Block Grant program funds the city's [first-time homebuyer program](#), owner-occupied [rehabilitation program](#), and [emergency home repair program for seniors](#). CDBG also provides funding for a number of [social services partners](#), as described in the current [Hennepin County Consortium CDBG Action Plan](#). Additionally, the Housing Division administers the federal [Section 8 rent assistance](#) program and owns and operates two [senior housing](#) facilities.

View a list of [Publicly Subsidized and Naturally Occurring Affordable Housing \(NOAH\) Multi-Family Properties](#) (PDF).

The Housing Division works with residents, building owners and developers to assist in providing a broad range of housing options in the city. The division promotes and contributes to the economic health of the community through the creation and maintenance of affordable, life-cycle housing and active participation in the city's development and redevelopment processes.

### Studies and Updates

**2019 Draft CDBG Action Plan**  
[View the draft action plan](#) (PDF)

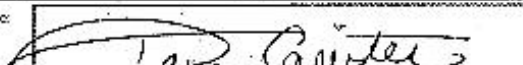
**2018 Plymouth Rental Housing Study Now Available**  
[View the rental housing study](#) (PDF)

# Grantee SF-424's and Certification(s)

OMB Number: 4040-0004  
Expiration Date: 12/31/2018

Application for Federal Assistance SF-424		
<p>1. Type of Submission</p> <p><input type="checkbox"/> Preapplication</p> <p><input checked="" type="checkbox"/> Application</p> <p><input type="checkbox"/> Changed/Corrected Application</p>		
<p>2. Type of Application:</p> <p><input checked="" type="checkbox"/> New</p> <p><input type="checkbox"/> Continuation</p> <p><input type="checkbox"/> Revision</p>		
<p>3. Revision, select appropriate letter(s):</p> <p>Other (Specify):</p>		
<p>5. Date Received:</p> <p>6-15-17-27-C005</p>		
<p>4. Applicant Identifier:</p> <p>6-15-17-27-C005</p>		
<p>5a. Federal Entity Identifier:</p> <p>5b. Federal Award Identifier:</p>		
<p>State (Use Only):</p>		
<p>6. Date Received by State:</p> <p>7. State Application Identifier:</p>		
<p>8. APPLICANT INFORMATION:</p>		
<p>a. Legal Name: City of Plymouth</p>		
<p>b. Employer/Taxpayer Identification Number (E/TIN):</p> <p>41-6068535</p>		
<p>c. Organizational DUNS:</p> <p>0291016785690</p>		
<p>d. Address:</p> <p>Street1: 3400 Plymouth Boulevard</p> <p>Street2:</p> <p>City: Plymouth</p> <p>County/Parish:</p> <p>State: MI</p> <p>Province:</p> <p>Country: United States</p> <p>Zip / Postal Code: 48170-1418</p>		
<p>e. Organizational Unit:</p> <p>Department Name: Community Development</p> <p>Division Name: Housing</p>		
<p>f. Name and contact information of person to be contacted on matters involving this application:</p> <p>Prefix: Mr.</p> <p>First Name: James</p> <p>Middle Name:</p> <p>Last Name: Brames</p> <p>Suffix:</p> <p>Title: Housing Program Manager</p> <p>Organizational Affiliation:</p> <p>Telephone Number: 734-769-4415</p> <p>Fax Number:</p> <p>Email: jbrames@plymouthmi.gov</p>		

<b>Application for Federal Assistance SF-424</b>		
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="(0) City or Township Government"/>		
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>		
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>		
<b>* Other (specify):</b> <input type="text"/>		
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>		
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14-200"/>		
<b>CFOA Title:</b> <input type="text" value="Community Development Block Grant Program"/>		
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="N/A"/>		
<b>* Title:</b> <input type="text" value="2019 Community Development Block Grant Program"/>		
<b>13. Competition Identification Number:</b> <input type="text"/>		
<b>Title:</b> <input type="text"/>		
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>		
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="City of Plymouth Community Development Block Grant Program"/>		
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>		

<b>Application for Federal Assistance SF-424</b>	
<b>15. Congressional Districts Of:</b>	
* a. Applicant: <input type="text" value="NA-003"/>	* b. Program/Project: <input type="text" value="NR-003"/>
Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="07/01/2018"/>	* b. End Date: <input type="text" value="06/30/2020"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="0.00,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.000.00"/>
* g. TOTAL	<input type="text" value="0.00,000.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review or <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)</b> <input checked="" type="checkbox"/> ** I AMRHH ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="David"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Carter"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="City Manager"/>	
* Telephone Number: <input type="text" value="703-595-5991"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="dcarter@cityofharrison.com"/>	
* Signature of Authorized Representative: 	* Data Entry: <input type="text" value="5-28-19"/>

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0036  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0548-0042), Washington, DC 20503.

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

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1551-1603, and 1685-1685), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §704), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§250c-3 and 250c-5), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§801 et seq.), as amended, relating to nondiscrimination in the sale, rental, or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-87)  
Prescribed by OMB Circular A-102

11. Will comply or has already complied, with the requirements of Titles I and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(s) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190); and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11860; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 175(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-823); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 105 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470; EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§459a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 105(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Lynchburg	5-29-19

8-4241 (Rev. 7-87) Back

## CERTIFICATIONS

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

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

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

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

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

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPEWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

5-29-19  
Date

### **Specific CDBG Certifications**

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies short, medium and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available;
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year 2019 shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed 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.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 1601-1619), and implementing regulations.

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

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

  
Signature/Authorized Official

5-29-19  
Date

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING:

#### A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31,

U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.