

# **Meeting Agenda - Final**

# **Community & Economic Development Committee**

Wednesday, September 28, 2016			5:00 PM	Council Chambers, 6th Floor		
1.	Call meeti	ng to order				
2.	Roll call of	membersh	nip			
3.	Approval o	of minutes f	rom previous meeting			
	<u>16-1521</u>	CEDC Mi	nutes from 9-21-16			
		<u>Attachmen</u>	ts: CEDC Minutes 9-21-16.pdf			
4.	Public He	arings/Ap	pearances			
5.	Action Ite	ms				
	<u>16-1377</u>	City Prog Funding	ram Funding Approval ar	d City Proposals for 2017 CDBG		
		0	ts: City Proposals Memo to CE	EDC Amended 9-28-16.pdf		
			CDBG Policy.pdf			
			HRLP CDBG Application.p	<u>df</u>		
			Dept Proposals CEDC Mer	no ORIGINAL 9-14-16.pdf		
		<u>Legislative</u>	<u>History</u>			
		9/14/16	Community & Economic Development Committee	recommended for approval		
		9/21/16	Common Council	referred to the Community & Economic Development Committee		
			This item was referred back to Committee by Alderperson Lobner.			

# 6. Information Items

7. Adjournment

Notice is hereby given that a quorum of the Common Council may be present during this meeting, although no Council action will be taken.

Any questions about items on this meeting are to be directed to Karen Harkness, Director, Community and Economic Development Department at 920-832-6468.

Reasonable Accommodations for Persons with Disabilities will be made upon Request and if Feasible.



# Meeting Minutes - Final Community & Economic Development Committee

Wed	Inesday, September 21, 201	6:30 PM	Council Chambers, 6th Floor
		SPECIAL	
1.	Call meeting to orde		
	Мее	ng called to order at 6:30 p.m.	
2.	Roll call of members	nip	
	Present:	4 - Coenen, Baranowski, Reed and Sieb	ers
	Excused:	1 - Mann	
	Alde Alde Robe Racl	s present: berson Joe Martin, District #4 berson Kathy Plank, District #7 t Brownlee, 5321 N. Haymeadow Avenue ael Crawford, 5533 N. Haymeadow Avenue Parrish, 5420 N. Haymeadow Avenue	
3.	Approval of minutes	from previous meeting	
	<u>16-1466</u> CEE	C Minutes from 9-14-16	
	Attac	ments: CEDC Minutes 9-14-16.pdf	
	Sieb	rs moved, seconded by Reed, that the I	Minutes be approved. Roll Call.

Motion carried by the following vote:

Aye: 3 - Coenen, Reed and Siebers

Excused: 1 - Mann

Abstained: 1 - Baranowski

# 4. Public Hearings/Appearances

5. Action Items

- <u>16-1312</u> Request to approve the Alexander Company & Iconica Development Agreement for Eagle Point for an approximate 8.1 acre site at 935 E. John Street in Tax Increment Financing District No. 8
  - Attachments:
     Memo on Alexander Co Iconica Development Agreement for E John

     Street.pdf
     Eagle Point Development Agreement FINAL 9-16-16.pdf

     TIF8.pdf
     TIF8.pdf

Baranowski moved, seconded by Siebers, that the Report Action Item be recommended for approval. Roll Call. Motion carried by the following vote:

- Aye: 4 Coenen, Baranowski, Reed and Siebers
- Excused: 1 Mann
- <u>16-1467</u> Request to approve the offer to purchase of 210 W. Edgewood Drive in the Town of Grand Chute and authorize the budget adjustment from the Industrial Park Land Fund for the associated acquisition and due diligence costs not to exceed \$610,000.00

 Attachments:
 Memo to CEDC & Finance on Purchase of 210 W Edgewood Dr.pdf

 210EdgewoodAirPhoto.pdf

 210EdgewoodMap.pdf

 Future Land Use Revise6\_16.pdf

 210 W Edgewood Accepted Offer.pdf

Baranowski moved, seconded by Siebers, that the Report Action Item be recommended for approval. Roll Call. Motion carried by the following vote:

- Aye: 4 Coenen, Baranowski, Reed and Siebers
- Excused: 1 Mann
- <u>16-1468</u> The Community and Economic Development Committee may go into closed session according to State Statute 19.85(1)(e) for the purpose of deliberating or discussing the purchasing of property on the northwest side of the City of Appleton and then reconvene into open session

The Community & Economic Development Committee did not go into closed session.

# 6. Information Items

## 7. Adjournment

Baranowski moved, seconded by Siebers, that the meeting be adjourned at 6:59 p.m. Roll Call. Motion carried by the following vote:

Aye: 4 - Coenen, Baranowski, Reed and Siebers

Excused: 1 - Mann



# MEMORANDUM

"...meeting community needs...enhancing quality of life."

TO:	Community and Economic Development Committee
FROM:	Nikki Gerhard, Community Development Specialist
DATE:	September 28, 2016
RE:	AMENDED City Program funding approval and City Proposals for 2017 Community Development Block Grant (CDBG) Funding

Per City of Appleton CDBG Policy, the process of allocating 2017 CDBG funds has begun. An award estimate of \$528,000 was budgeted for the 2017 Program Year. \$528,000 is only an estimate and is subject to change upon adoption of the Federal budget. On September 14, 2016, CEDC staff proposed the following amounts and breakdown for approval for the 2017 Budget:

	Proposed
Housing Rehabilitation Loan Program	\$80,290
Neighborhood Program	\$0
*CDBG Administrative Costs	\$40,282
Appleton Housing Authority	\$60,000
TOTAL	\$180,572
Funds made available to City Departments & Community Partners	\$347,428

\*includes funding for provision of HUD required Fair Housing Services at \$25,000

Since CEDC approval on September 14<sup>th</sup>, the amounts associated with administration costs for the Housing Rehab Loan Program and City Administration have been finalized as part of the City's budget process to reflect actual costs associated with these programs (salary, fringe benefits, and admin expenses). These revised amounts will be reflected in the City's Executive Budget that will be distributed to the Common Council on October 5<sup>th</sup>. At this time we are asking for CEDC approval of these revised amounts to be consistent with the Executive Budget.

	Adjusted	Difference from
	Proposed	Previous Approval
Housing Rehabilitation Loan Program	\$81,222	+\$932
Neighborhood Program	\$0	-
*CDBG Administrative Costs	\$49,192	+\$8,910
Appleton Housing Authority	\$60,000	-
TOTAL	\$190,414	+\$9,842
Funds made available to City Departments & Community Partners	\$337,586	(\$9,842)

\*includes funding for provision of HUD required Fair Housing Services at \$25,000

Proposals from City Departments were due September 2, 2016. One application was submitted. Upon receipt, the application was thoroughly reviewed by the Community and Economic Development Specialist for eligibility under HUD program regulations and it was determined that the proposed project was eligible.

The proposal from the Community & Economic Development Department is for \$200,000 to support site acquisition and infrastructure for "meeting community needs and enhancing quality of life" by creating a small home community that will expand housing options that are affordable for all residents of the City of Appleton. The entire proposal is attached.

The Department's request for CDBG funding supports our local Comprehensive Plan in several goals and objectives. The *Comprehensive Plan 2010-2030* and Future Land Use Map are intended to guide City growth and development in an organized, efficient manner. The Plan addresses a range of topics related to land use, housing and neighborhoods, economic development, transportation, utilities and community facilities, and more. Evaluating the proposed CDBG application for consistency with relevant goals, objectives, and policies is provided to give context for Council consideration of funding this application and its consistency with City goals.

## Goal 1 – Community Growth

Appleton will continue to provide opportunities for residential, commercial, and industrial growth, including appropriate redevelopment sites within the downtown and existing neighborhoods and greenfield development sites at the City's edge.

### Goal 3 – Housing Quality and Affordability

Appleton will provide a variety of rental and ownership housing choices in a range of prices affordable to community residents, and ensure that existing housing is adequately maintained in terms of physical quality and market viability.

*OBJECTIVE 5.3 Housing and Neighborhoods: Provide a range of housing styles that meet the needs and appeal to all segments of the community.* 

*OBJECTIVE 7.1 Utilities and Community Facilities: Provide a pattern of development that minimizes impacts to municipal services and utilities.* 

OBJECTIVE 10.1 Land Use:

Provide an adequate supply of suitable land meeting the demand for development of various land uses.

Furthermore, the Community and Economic Development Department's request for CDBG funding supports our local 2015-2019 Consolidated Plan, which was previously approved by City Council and HUD. The 2015-2019 Consolidated Plan is a five-year strategic plan that outlines the goals of the City of Appleton's Community Development Block Grant (CDBG) Program which is funded by the U.S. Department of Housing and Urban Development (HUD). The primary goal of the City of Appleton's CDBG Program is the creation of a thriving urban community through provision of assistance to low- and moderate-income households in the forms of basic shelter, affordable housing opportunities, expanded economic opportunities, suitable living environments and supportive services related to residential, financial and social stability. The plan summarizes the needs of the community and the goals and strategies the City will follow to achieve the planned outcomes.

Goal 3—Acquisition for New Housing Acquire and provide the City of Appleton with 15 new housing units

CEDC made a recommendation on September 14, 2016 to Common Council for the proposed allocations for City programs and funding for the proposal from the Community & Economic Development Department. That recommendation has been referred back for further review. Staff has prepared a detailed presentation to provide as additional support of their application.

Following CEDC and Council approval of City program funding and City Department applications, the next step in the CDBG allocation process are applications from community partners. Per the Community Development Block Grant Policy, after all community partner applications have been received (due September 29, 2016) and determined eligible, CEDD staff will supply the CDBG Advisory Board with the applications and all appropriate guidelines along with a summary of each proposal and an explanation of the proposal score sheet. These packets of information are expected to be distributed to the Advisory Board members on Monday, October 3, 2016. Board members are asked to allocate funding among the applicants and return their allocations to CEDD staff who will compile all results and will present allocation recommendations at an Advisory Board meeting on October 25, 2016, during which allocation amounts will be finalized based on the anticipated projected award. Funding recommendations from this Board will be presented as an Action Item to CEDC on October 26, 2016. CEDC's recommendation will then be presented to the Common Council for final approval.

If you have any questions, please contact me at 832-6469 or nikki.gerhard@appleton.org. Thank you!

Community and Economic Development Department, 100 North Appleton Street, Appleton, WI 54911 (920) 832-6468





### Community Development Block Grant (CDBG) Policy Adopted 9/8/2008, Amended 5/24/2010, 10/3/2012, 12/19/2012, 7/15/2015

### I. PURPOSE

To outline the following aspects of the local Community Development Block Grant (CDBG) Program: a) elements to which the City of Appleton must adhere in order to comply with federal regulations; b) locally-established guidelines; and c) priorities for subrecipient and City Program activity.

### II. POLICY

The federal CDBG program was established with the passage of the Housing and Community Development Act of 1974. CDBG funds are distributed to eligible governmental units in two forms:

- (1). Entitlement grants directly to cities and counties, and;
- (2). State grants, which involve annual competitions for non-entitlement communities.

Since 1975, the City of Appleton has received CDBG funds as an entitlement community. The amount of CDBG funds received each year varies based on the appropriation approved by the U.S. Congress and the number of governmental units eligible to participate. While the federal fiscal year operates from October 1 to September 30, the City selected April 1 to March 31 as its CDBG fiscal year. This selection was made as the federal government generally does not release the aforementioned funds until springtime. Federal oversight lies within the U.S. Department of Housing & Urban Development (HUD).

### III. FEDERAL REGULATIONS

The citation reference from Title 24 Part 570 – Community Development Block Grants can be found in parentheses next to each heading below. Please view that section for more information on the respective item.

### A. Federal Eligibility (24 CFR 570.201)

CDBG funds may be used for the following basic eligible activities:

- (1). Acquisition
- (2). Disposition
- (3). Public Facilities/Improvements
- (4). Clearance/Remediation
- (5). Public Services
- (6). Interim Assistance
- (7). Payment of Non-Federal Share
- (8). Urban Renewal Completion
- (9). Relocation
- (10). Loss of Rental Income
- B. Ineligible Activities (24 CFR 570.207)

The following activities may not be assisted with CDBG funds:

- (1). Buildings (or portions thereof) for the General Conduct of Government
- (2). General Government Expenses
- (3). Political Activities

The following activities are not eligible for CDBG funding, but may be allowed under certain circumstances:

(1). Purchase of Equipment

- (3). New Housing Construction
- (2). Operating/Maintenance Expenses
- (4). Income Payments
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- (11). Housing Services (12). Privately-Owned Utilities
- (13). Homeownership Assistance
- (14). Economic Development Assistance
- (15). Technical Assistance
- (16). Institutions of Higher Education
- (17). Rehabilitation/Preservation (24 CFR 570.202)
- (18). Planning (24 CFR 570.205)
- (19). Administration (24 CFR 570.206)





## C. Special Economic Development Projects (24 CFR 570.203)

CDBG funds may be used for special economic development activities in addition to other activities. Special economic development activities include:

- (1). Acquisition, construction, reconstruction, rehabilitation or installation of commercial or industrial buildings, structures, and other real property equipment and improvements
- (2). Assistance to a private for-profit business, including, but not limited to, grants, loans, loan guarantees, interest supplements, technical assistance, and other forms of support, for any activity where the assistance is appropriate to carry out an economic development project
- (3). Economic development services, including, but not limited to, outreach efforts; screening of applicants; reviewing/underwriting applications; preparation of all necessary agreements; management of activities; and the screening, referral, and placement of applicants for employment

### D. National Objectives (24 CFR 570.208)

In order to qualify for funding, activities must meet one of three CDBG national objectives:

- (1). Low & Moderate Income (LMI) Benefit
  - a. <u>Area Benefit</u>: activities available for the benefit of all the residents in a particular area, where at least 51 percent of those residents are LMI persons.
  - b. <u>Limited Clientele</u>: activities benefiting a specific group (i.e. abused children, elderly persons, battered spouses), at least 51 percent of whom are LMI persons.
  - c. <u>Housing</u>: activities carried out for the purpose of providing or improving permanent residential structures that, upon completion, will be occupied by LMI households.
  - d. Job Creation/Retention: activities designed to create or retain permanent jobs where at least 51 percent of the jobs involve the employment of LMI persons.
- (2). Slum & Blight Removal
  - a. <u>Area Basis</u>: activities undertaken to eliminate specific conditions of blight, physical decay, or environmental contamination that are located in a designated area of distress, including acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, or rehabilitation. Rehabilitation must eliminate conditions that are detrimental to public health/safety; acquisition and relocation must be precursors to other activities that eliminate blight.
  - b. <u>Spot Basis</u>: activities undertaken to eliminate specific conditions of blight, physical decay, or environmental contamination at specific sites not located in designated blighted areas, including acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, or rehabilitation. Rehabilitation must eliminate conditions that are detrimental to public health/safety; acquisition and relocation must be precursors to other activities that eliminate blight.
- (3). Urgent Need
  - a. Activities designed to alleviate existing conditions of recent origin (18 months) that pose serious threats to the health and welfare of the community; this objective may only be used if the community cannot finance necessary activities with other sources.





## E. <u>Categorical Limits</u>

- (1). At least 70 percent of CDBG funds utilized during three consecutive program years, as specified by the grantee, must be expended for LMI benefit; the costs of planning and program administration are excluded from this calculation. (24 CFR 570.200(a)(3))
- (2). The amount of CDBG funds obligated for public service activities in each program year may not exceed 15 percent of the total entitlement grant for that program year, plus 15 percent of the program income received during the preceding program year. (24 CFR 570.201(c)(1))
- (3). The amount of CDBG funds obligated for planning and administration activities in each program year may not exceed 20 percent of the total entitlement grant for that program year plus the program income received during that program year. (24 CFR 570.200(g))

## F. Program Income (24 CFR 570.426)

The City may reuse any revenue generated from projects undertaken with CDBG funding towards other eligible activities within the entitlement community. Furthermore, any program income earned by a subrecipient or City Program may be retained by the subrecipient or City Program provided the income is treated as additional CDBG funds and thus subject to all applicable federal and local requirements.

## G. Fair Housing (24 CFR 570.601)

The Secretary of HUD requires that:

- (1). Grantees must administer all activities related to housing and community development in a manner to affirmatively further the policies of the Fair Housing Act. (Public Law 90-284)
- (2). Entitlement communities shall conduct an Analysis of Impediments to Fair Housing Choice every five years, take action to overcome the effects of the identified impediments and maintain records reflecting the analysis and related actions taken.

## H. Environmental Review Procedures (24 CFR 570.604)

The environmental review procedures outlined in 24 CFR part 58 must be completed for each CDBG subrecipient and City Program activity, as applicable.

## I. Faith-Based Activities (24 CFR 570.200)

Religious or faith-based organizations are eligible to participate in the CDBG program. Local government representatives and CDBG program administrators shall not discriminate against an organization on the basis of its religious affiliation.

## J. Submission Requirements (24 CFR 570.302)

CDBG entitlement communities must submit the following documents:

- (1). Action Plan  $\rightarrow$  annually
- (2). Consolidated Annual Performance and Evaluation Report (CAPER)  $\rightarrow$  annually

(3). Consolidated Plan  $\rightarrow$  every three to five years, as chosen by the entitlement community

Creation of these documents must follow HUD requirements for content and citizen participation (see the City of Appleton CDBG Citizen Participation Plan).

## K. Location of Activities (24 CFR 570.309)

CDBG funds may be awarded to an activity outside the jurisdiction of the entitlement community only if it can be determined that the activity directly benefits the entitlement community's residents. Documentation of these benefits must be provided before CDBG funds are awarded for the activity.





## L. Conflict of Interest (24 CFR 570.611)

No persons affiliated with the entitlement community (including subrecipients and City Programs) who exercise or have exercised any responsibilities with respect to CDBG programming, or who are in a position to participate in a decision-making process, may obtain a financial interest or benefit from a CDBG-assisted activity (including subcontracts), either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter.

## IV. LOCAL PROGRAM GUIDELINES

## A. Program Oversight

The Community and Economic Development Committee (CEDC) – composed of five aldermen appointed by the Mayor – serves as the jurisdiction for Common Council oversight of the CDBG Program. Local financial oversight lies with the City of Appleton Finance Department. Local administrative/programmatic oversight lies with the City of Appleton Community and Economic Development Department (CEDD).

## B. <u>Consolidated Plan Submission</u>

The City of Appleton has elected to submit a Consolidated Plan to HUD every five years. The Citizen Participation Plan provides for and encourages citizens to participate in the development of the Consolidated Plan, which will begin approximately one year before the required submittal date.

## C. Definitions

- Subrecipient an entity charged with implementation of one or more activities funded with Appleton CDBG dollars
  - community partner subrecipient local agencies awarded CDBG-funding to implement an eligible activity via a competitive application process
  - public services subrecipient local agencies awarded CDBG-funding to implement an eligible public service activity via a competitive application process
- Adjusted award the amount of CDBG funds available to City Programs and subrecipients after administration, fair housing, and audit allocations are deducted

## D. Local Categorical Limits

The following limits expand upon federal categorical limits associated with the CDBG program:

- (1). At least 70 percent of CDBG funds utilized over three program years must be expended for LMI benefit; this excludes planning/CDBG administration activities.
- (2). The amount of CDBG funds obligated for public service activities in each program year may not exceed 15 percent of the adjusted award for that year.
- (3). The amount of CDBG funds obligated for planning/CDBG administration activities in each program year may not exceed 20 percent of the total entitlement grant for that year.
- (4). Any single award will not be less than \$10,000.

## E. <u>Audit Requirements</u>

Section 2 Part 200 of the Code of Federal Regulations and the State Single Audit Guidelines require major state programs and federal programs to complete a single audit. The necessary amount for fulfilling these requirements will be identified by the Finance Department and the City's independent auditors. This amount will be deducted from the estimated amount available for the program year and not included in the estimates of the adjusted award.





### F. Fair Housing Services

In keeping with the spirit of federal fair housing requirements, an annual allocation for fair housing services will be approved. This activity will be reported as an administrative expense, which claims no benefit. The City of Appleton will utilize the award to contract with an independent entity qualified to provide residents with a variety of fair housing services. This amount will be deducted from the estimated amount available for the program year and not included in the estimates of the adjusted award.

### G. Program Administration

HUD requires entitlement communities to provide for efficient and adequate administration of CDBG programming. Administration costs may only include: salary/fringe, necessary training/travel, supplies and telephone/postage, in addition to fair housing services and audit costs. The necessary amount for fulfilling this requirement will be identified by the Community and Economic Development and Finance Departments. This amount will be deducted from the estimated amount available for the program year and not included in the estimates of the adjusted award.

### H. Annual Allocation of CDBG Funding

The City of Appleton's Program Year begins April 1 and concludes March 31 of the following year. Each program year, administration, audit and fair housing costs, along with adequate funding for the Homeowner Rehabilitation Loan Program, the Neighborhood Program and Appleton Housing Authority will be subtracted from the annual entitlement award amount to determine the adjusted award. The adjusted award will first be available to City of Appleton Departments/Programs/component units that wish to undertake projects. After the City allocation process is complete, any remaining funds may be allocated to community partner applicants.

### I. City Allocation Process

Each year adequate funding will be allocated through the City Budget process to the following: Homeowner Rehabilitation Loan Program, Neighborhood Program, Administration Costs and Appleton Housing Authority. Then, other City of Appleton Departments will have the opportunity to submit an application for CDBG funding. The application will include information relating to goals, outputs, budget/financing, detailed activity descriptions, capacity and performance. CEDD staff, per HUD rules and regulations, will perform an administrative review of each plan to ensure that:

- 1. Proposed activities are included within the listing of eligible activities (24 CFR 570.201)
- 2. Proposed activities do not fall within a category of explicitly ineligible activities (24 CFR 570.207)
- 3. Proposed activities will meet one of the national objectives of the program (24 CFR 570.200)
- 4. Proposed activities will address priority needs as identified in the Consolidated Plan

Upon completion of the administrative review, the plans will be presented to the CEDC. CEDC will also review the submitted plans to ensure the proposed activities meet the four standards listed above and allocate adequate funds for each plan. CEDC's recommendation will then be presented to the Common Council for approval.

## J. <u>Community Partner Subrecipient Allocation Process</u>

The community partner application process will begin after allocations for City applications have been approved, and end with recommended allocations being announced after Council approval. Applications will be made available for approximately one month and should be submitted to the CEDD. All applications must be received by the announced deadline; no exceptions will be made. CEDD staff will perform an administrative review of each proposal, per HUD rules and regulations, to ensure the four



standards listed under letter E. above, will be met if proposed activities are funded.

Upon completion of the administrative review, the proposals will be presented to the CDBG Advisory Board which will review and make funding recommendations for each proposal. This Board will consist of the following members:

- 1. Mayor
- 2. Common Council President
- 3. Chairperson of the Community and Economic Development Committee or committee designee
- 4. Chairperson of the Appleton Redevelopment Authority or committee designee
- 5. Representative from an Experienced Outside Funding Agency on a rotating basis (i.e. United Way, Community Foundation, JJ Keller Foundation, U.S. Oil Basic Needs Partnership)
- 6. Citizen member from the City Plan Commission

CEDD staff will supply the Board with applications and all appropriate guidelines along with a summary of each proposal, and an explanation of the proposal score sheet. Board members are asked to allocate funding among the applicants and return their allocations to CEDD staff who will compile all results and present allocation recommendations at a Board meeting during which allocation amounts will be finalized. In completing their funding recommendation, the Board will utilize an estimated CDBG entitlement award dollar amount, which will be calculated based on past awards and any available information on HUD's future funding strategies. Funding recommendations from this Board will be presented as an Action Item to the CEDC. CEDC's recommendation will then be presented to the Common Council for final approval.

## K. Estimated vs. Actual Entitlement Award

If there is a differential between the estimated award and the actual award, the CDBG Advisory Board will be consulted and their recommendations will be presented to CEDC and Council for approval.

## L. Subrecipient Agreement/Letter of Understanding/Training Session

Community partner subrecipients of CDBG funds must enter into a subrecipient agreement with the City of Appleton. This subrecipient agreement serves as a formal contract addressing the various policies outlined in this document, in addition to contract amount/term, reimbursement requests, accomplishment reporting, monitoring, financial management guidelines, conflict of interest, and additional federal standards, including lead-based paint regulations and the Davis Bacon Act. Furthermore, each City Program receiving CDBG funds must sign a Letter of Understanding (LOU) indicating an understanding of the items above. To ensure all parties understand the requirements of their agreement or LOU, a mandatory training session will be held with new subrecipients before funds are released. Technical assistance from staff will be available to all subrecipients throughout the program year.

## M. Statement of Work

All subrecipients and City Programs shall submit a concise Statement of Work that illustrates an implementation plan for their CDBG activity. This Statement, which will be attached to the subrecipient agreement/LOU includes: national objective claimed, activity descriptions, intended beneficiaries (number and type), detailed budget and location(s) of program-related activity.

## N. <u>Report Submissions</u>

All subrecipients and City Programs are required to submit a report of their accomplishments with each payment request during the program year when applicable, as well as an Annual Report by April 15th, which is a comprehensive report covering the agreed upon objectives, activities and expenditures for the entire





contract period. If said reports are not attached to payment requests when required, payments will be withheld until the report is submitted.

### O. Change of Use

If a subrecipient or City Program wishes to utilize funds for an activity not identified on their original application, they are required to submit a detailed letter to the CEDD explaining the reasoning for and amount of the proposed change and a public comment period may be held per the Citizen Participation Plan.

### P. Displacement/Relocation

Due to the potential liability for long-term assistance and burdens placed on affected tenants, the City of Appleton will avoid funding CDBG projects that involve permanent residential displacement or business relocation unless displacement/relocation prove to be the only means available to correct a public health/safety hazard or other critical condition.

### Q. Procurement

The City of Appleton Procurement Policy applies to all CDBG activities, including both City Programs and subrecipients that involve the purchase of equipment, materials, supplies and/or services. A copy of this policy will be distributed to all subrecipients.

### R. <u>Audits</u>

All subrecipients are required to submit one copy of their audited financial statement immediately following the end of their fiscal year during which CDBG funds are received, unless an alternate arrangement has been made with the City of Appleton Finance Department. CDBG applications may include audit costs as a reimbursable expense.

### S. <u>Disputes</u>

Any dispute concerning a question of fact arising under a subrecipient program or City Program shall be resolved by CEDD staff, who shall relay his/her decision in writing to the subrecipient or City Program, in addition to furnishing a copy to the Mayor and the CEDC. The decision of CEDD staff shall be final and conclusive unless the subrecipient or City Program furnishes a written appeal to the CEDC within ten days of the date of receipt of such copy. The decision of the CEDC in such appeals shall be final and conclusive unless appealed to a court of competent jurisdiction within 30 days of receipt of the CEDC's decision.

### T. Unspent Grant Funds

Any uncommitted CDBG funds remaining at the end of the program year will be reprogrammed for use in the subsequent program year. The subrecipient shall submit a carryover request, including both documentation of plans for expending funds and a timeline for the expenditure, to CEDD staff by April 15. If any unspent grant funds remain after September 30, CEDD staff will meet with the subrecipient to determine if further action needs to be taken to expedite the expenditure of funds.

### U. <u>Termination</u>

If the subrecipient or City Program fails to fulfill, in timely and proper manner, its obligations under the Statement of Work, or if they violate any stipulations contained within the subrecipient agreement/LOU, the City has the right to terminate funding of their program. Written notice will be delivered at least 30 days before the termination.





## V. Examination of Records/Monitoring

The subrecipient and City Program shall maintain records (including books, documentation and other evidence) pertaining to the costs of carrying out their activity to the extent of detail that will adequately reflect net costs, direct and indirect labor, materials, equipment, supplies/services, and other expenses. Authorized representatives of the City or HUD shall have access to subrecipient and City Program records at reasonable times of the business day for inspection, audit or reproduction. Subrecipients and City Programs must make these records available throughout the program year and four years after it expires. Furthermore, CEDD staff may schedule monitoring visits with the subrecipient to evaluate the progress/performance of the program and provide technical assistance.

## W. Financial Management Systems

Subrecipients and City Programs must employ financial management systems that are capable of generating regular financial status reports indicating the dollar amount allocated (including budget revisions), amount obligated, and amount expended for each activity. The system must permit the comparison of actual expenditures and revenues against budgeted amounts. The City must be able to isolate/trace every CDBG dollar received.

## X. Payment Requests

Community partner subrecipients and City Programs will submit requests for payment with attached supporting documentation to the CEDD. Payment requests shall be allowed on a reimbursement basis (i.e. only after expenditures have been incurred) and shall be reviewed to ensure the expenditures are in conformity with the use of funds as described in the Statement of Work. If source documentation is deemed inadequate by Staff, all payments will be withheld until all required documents have been submitted. Payment requests received and approved will be processed and a check issued in accordance with the City of Appleton Finance Department weekly pay cycle. All payment requests must contain an original signature.

### Y. Program Income

Any program income (as defined under applicable federal regulations) gained from any activity of the subrecipient may be retained by the subrecipient or City Program provided the income is treated as additional CDBG funds subject to all applicable requirements governing the use of CDBG funds. Anticipated program income must be documented and described in the subrecipient or City Program proposal/application. Furthermore, any and all program income received must be reported to the City of Appleton's Community and Economic Development and Finance Departments, unless otherwise specified in this contract.

## Z. CDBG Activity Promotion

All subrecipients and City Programs are required to participate in promotion of the City of Appleton CDBG Program. Expectations will be outlined by staff at the beginning of the program year and may include, but are not limited to:

- Inclusion of the Appleton/CDBG logo in materials/at project sites
- Mentorship of a subrecipient new to the CDBG Program
- Participation in a CDBG Open House to showcase grant activities

## V. APPLICATION/PROPOSAL EVALUATION CRITERIA

### A. General

In order to receive CDBG funding, subrecipient and City Programs must meet a priority need, as identified





in the Five-Year Consolidated Plan. Additional preference, however, will be given to CDBG applicant activities that meet one or more of the following criteria:

- (1). Seek a one-time use of CDBG funding
- (2). Benefit residents of LMI census tracts (population at least 46.7 percent LMI)
- (3). Will result in additional housing units being placed on the tax roll
- (4). Demonstrate secured complementary sources of funding (i.e. leverage) and/or strong efforts to solicit and secure complementary funding.
- (5). Serve special needs populations, including, but not limited to:
  - a. Elderly/frail elderly
    - b. Persons with disabilities (developmental and physical)
    - c. Persons with HIV/AIDS and their families
    - d. Persons seeking solutions to alcohol and drug addiction

### B. Public Services (subject to 15 percent cap)

Preference will be given to Public Service CDBG applicants whose activities meet one or more of the following criteria:

- (1). Program service costs one time use
- (2). Administrative expenses one time use
- (3). Program service costs continual use
- (4). Administrative expenses continual use

### **PART A – CONTACT INFORMATION**

- 1. Program/Project Name: Community and Economic Development Housing Project
- 2. Contact Person Name/Title: Karen Harkness/Director
- 3. City Department: Community and Economic Development
- 4. Supervisor Name/Title (if applicable):
- 5. Telephone Number: (920) 832-6468
- 6. Fax Number: (920) 832-5994
- 7. Email Address: Karen.Harkness@appleton.org

#### **PART B - INDICATORS**

1. To be eligible for funding, the program/project for which you are requesting funding <u>must</u> address <u>one</u> <u>national objective</u>.

1

The project meets the needs of low- and moderate-income persons. At least 51 percent of the participants or beneficiaries of the project will meet the low- and moderate-income guidelines listed in Exhibit A.

The project is located in a low- and moderate-income area. In this case, the project must be available to all the residents of one of the areas identified on the map in Exhibit B and primarily residential. Typical activities funded are area street improvements, water and sewer lines, parks and other public facilities.

The project meets the needs of one of the following specific groups of people (low-mod limited clientele): abused children, elderly persons, battered spouses, homeless persons, severely disabled persons, illiterate adults, persons living with AIDS and migrant farm workers.

The project provides housing assistance to low- and moderate-income households. Fundable activities include housing rehabilitation, acquisition of property for housing and homeownership assistance.

The project creates or retains jobs for low- and moderate-income persons.

The project eliminates specific instances of blight or physical decay. The only activities to be funded under this category are acquisition, demolition or rehabilitation of buildings.

2.	Program category:	
	X Acquisition	🔀 Housing
	Administration/Planning	Public Facilities
	Economic Development	Public Services
3.	Priority need(s) met (use list provided in Exhibit	C):
	a) Acquisition for new housing	
	b) Improve and maintain housing stock	
	c) <u>Neighborhood revitalization</u>	
4.	Proposed output type and number (select more th	an one if necessary):
	persons directly served	$\boxed{5}$ housing units rehabilitated/acquired
	$\boxed{5}$ households directly served	jobs created/retained
	businesses rehabilitated	other (specify:)
5.	Check one HUD-defined objective that best related	es to your potential CDBG-funded program:
	$\Box \underline{Create Suitable Living Environments} \rightarrow address i$	ssues in daily life (social barriers, physical barriers, etc.)
	$\square$ Provide Decent Affordable Housing $\rightarrow$ address in	ndividual, family, or neighborhood housing needs
	$\square \underline{Expand Economic Opportunity} \rightarrow address economic Description address $	omic development (job creation, commercial rehab, etc.)
6.	Check one HUD-defined outcome that best relate	es to your potential CDBG-funded program:

- $\square \underline{Availability/Accessibility} \rightarrow \text{make basic services more readily available/accessible to low-income persons}$
- $\bigtriangleup$  Affordability  $\rightarrow$  make basic services more affordable for low-income persons in a variety of ways
- $\Box$  Sustainability  $\rightarrow$  improve the overall viability of communities (blight elimination, LMI benefits, etc.)

# PART C - FUNDING INFORMATION

(limit narrative responses to the space provided)

- 1. CDBG funds requested (minimum of \$10,000): \$200,000
- 2. Percent of total program/project budget that will be covered by this CDBG award: 33%
- 3. Is it anticipated that CDBG funding will be needed for this activity in the future? If so, describe the reason and plan for future funds.

There may be additional requests in 2018 and possibly 2019, particularly if we increase the number of units. This will depend on the finalized site, cost of acquisition and infrastructure.

### 4. Amounts of prior year CDBG awards received by your department:

2016-2017 = for this particular project/\$535,325 as a department 2015-2016 = for this particular project/\$523,813 as a department 2014-2015 = for this particular project/\$525,200 as a department

## 5. Detailed program/project budget for CDBG funds (Please be as detailed and specific as possible)

Program/Project Activity	CDBG Award Allotment
Salaries	\$
Fringe	\$
Office space (program only)	\$
Utilities	\$
Communications	\$
Copies/Printing	\$
Supplies and Materials	\$
Mileage	\$
Audit	\$
Indirect costs (specify)	\$
Other (specify): Acquisition of land/infrastructure	\$200,000
Other (specify)	\$
TOTAL:	\$200,000

6. If using the funds for wages/salaries, please list the titles of the positions and the percentage of the total wages/salary for each that will be funded by this CDBG award.

N/A - No salaries will be funded with this project

7. If the entire amount of your request is not allocated, will the activity still be possible? And if so, how will the activity be altered to allow for the smaller award?

Yes, additional funding from other sources will be sought. The project may be reduced in scope.

- Leverage Source (i.e. general funds, capital funds, etc.) Amount Status a) Other Federal/State Funding \$250,000 in process \$50,000 in process b) Private Donations \$100,000 c) In-Kind Donations from other agencies in process \$ (select one) d) (select one) \$ e)
- 8. SPECIFIC major sources that will/may also fund this program/project in 2017:

# 9. Describe your efforts to secure additional/complementary funding for your program/project. If this program/project will generate program income, please note the amount and how it will be spent.

Private Donations and In-Kind Donations from other agencies have already been offered for this project. Although no specific amounts have been committed yet, there are enough in-kind offers to fill the gaps for funding this project, as necessary. The intent is to apply for other federal and/or State funding, as needed, to fund the development/construction portion of the project. Due to the community support and interest in this project, those funds may not be necessary. The project is not expected to generate program income.

## **PART D – PROJECT DESCRIPTION**

(limit narrative responses to the space provided)

# 1. Describe the activities to be carried out through this grant request and how this activity relates to the mission of your department and the City.

The City of Appleton's mission is "meeting community needs and enhancing quality of life." Our Department delivers programs and services to fulfill the City's mission and a recent collaboration with local agencies produced the Project RUSH (Research to Understand and Solve Homelessness) report that illustrates specific needs in our community. Our proposal is to address the City's mission and Project RUSH through the creation of a small home community. This will expand housing options that are affordable for all residents of the City of Appleton.

# 2. Describe how the project meets the national objective and how it fits into the program category, both chosen above (Part B).

The objective of the project is to provide decent affordable housing which would serve households where at least 51% of the beneficiaries are low and moderate-income.

3. Identify the projected target population the proposed CDBG-funded program/project will serve (i.e. age, race, residency, disability, income level, other unique characteristics/information). The projected target population will be primarily low- to moderate-income households with incomes below 80% CMI. It is anticipated that the majority of the beneficiaries will also be elderly, disabled, and/or minorities. However, the housing will not be limited to that clientele.

4. Describe how this program/project is unique and/or coordinates with others to avoid duplication of services and meets the high priority needs of the community as chosen in Part B.

This project will specifically address a housing need of the community as identified in the Project RUSH study. The goal is to develop 5 affordable housing units in a small home community that will be permanently affordable to low- and moderate-income residents of the City of Appleton. The intent is to acquire and clear the land and prepare it for development with CDBG funds. Non-profit housing agencies will then work with City staff to develop the housing for that site as deemed appropriate by the City of Appleton. Our department may be involved in helping to secure additional funding from other state and federal resources for the development of that housing, if necessary.

### **PART E – OUTCOMES**

#### (limit narrative responses to the space provided)

1. Describe how the potential CDBG-funded program relates to the outcome chosen above (Part B). The project will provide new decent, safe, and affordable housing in Appleton, constructed in a way that will ensure the dwelling will retain value, as well as improve blighted areas of the City.

2. Briefly describe data that will be collected and/or analysis used to measure success in achieving the objective and outcome identified above (Part B) for the target population. The number of housing units constructed, the number of low- to moderate- income residents affected, and the elimination of blighted neighborhoods will determine the success of this project.

## PART F - ATTACHMENTS

- 1. Please attach the following information relating to your program/project:
  - Detailed Budget Breakdown (most current)
  - Department Structure Chart
  - N/A Descriptive Material (brochures, flyers, fact sheets, etc.)

## **PART G – AUTHORIZATION**

Name of Department Head

Title of Department Head Development

Signature of Department Head

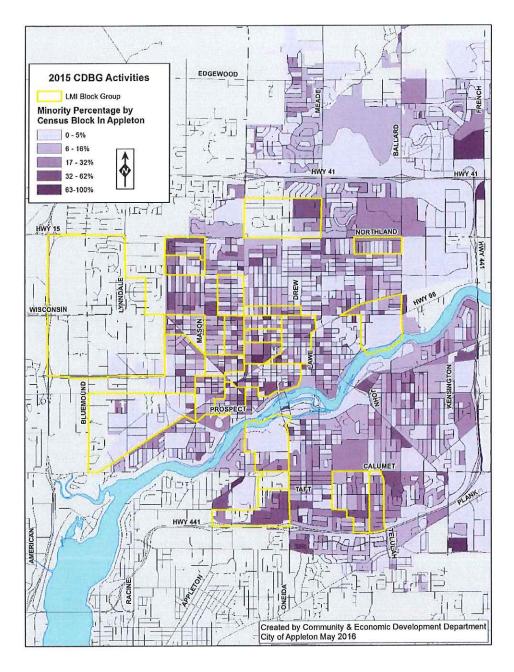
# EXHIBIT A: FY 2016 Income Limits Documentation System

<u>.</u>	<u> </u>	
Outagamie	County,	wisconsin

	l'		ataBanne e					
FY 2015 Income								
Limit Category	1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
Extremely Low	\$	\$	\$	\$				
(30%)	15,550	17,750	20,160	24,300	\$ 28,440	\$ 32,580	\$ 36,730	\$ 40,890
	\$	\$	\$	\$				
Very Low (50%)	25,850	29,550	33,250	36,900	\$ 39,900	\$ 42,850	\$ 45,800	\$ 48,750
	\$	\$	\$	\$		54 58-4		24. Mr
Low (80%)	41,350	47,250	53,150	59,050	\$ 63,800	\$ 68,500	\$ 73,250	\$ 77,950

NOTE: Outagamie County is part of the Appleton, WI MSA, so all information presented here applies to all of the Appleton, WI MSA. The Appleton, WI MSA contains the following areas: Calumet County, WI; and Outagamie County, WI.

EXHIBIT B



# **EXHIBIT C: Priority Needs – City of Appleton**

As an Entitlement Community, the City of Appleton provides grant assistance for local projects through use of Community Development Block Grants (CDBG). Each year, organizations may apply for funding to implement activities that meet the goals and objectives as defined in the City's Five-Year Consolidated Plan. The priority needs for 2015-2019, around which these goals revolve, are included in the following table:

Five-Year Goals	Five-Year Goal Outcomes
Improve and maintain housing stock	175 owner-occupied homes rehabilitated
Homebuyer assistance	40 first-time homebuyers receive downpayment assistance
Rental rehabilitation	40 rental units rehabilitated
Acquisition for new housing	15 new housing units
Public facilities improvement and maintenance	900 persons assisted through allocations to community based agencies for facility improvement and maintenance activities
Neighborhood revitalization	10,000 persons assisted through various public facility improvements
Public services	5,500 persons assisted through provision of various public services

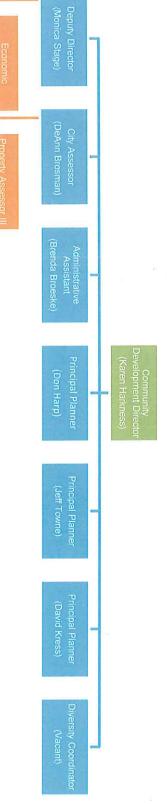
**Goals and Outcomes Summary** 

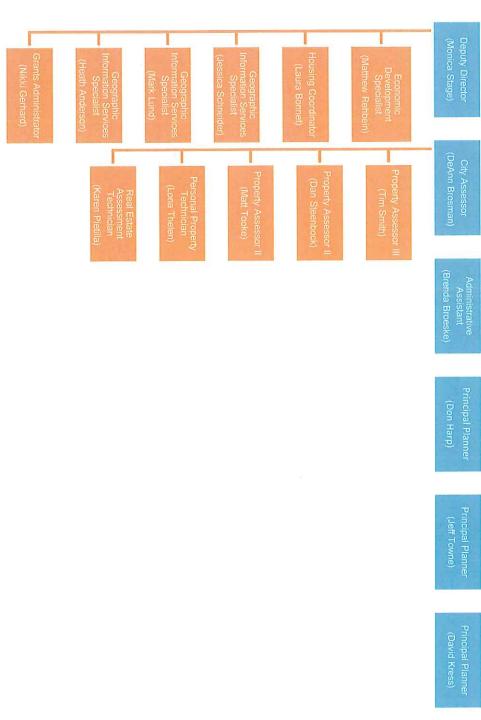
# Project Budget - CEDD Housing Project

Site Acquisition/Prep (CDBG Request)	\$ 200,000
In-Kind Donations	\$ 100,000
Private Donations	\$ 50,000
Federal/State Funding	\$ 250,000
Total Project Budget	\$ 600,000











# MEM O R A N D U M

"...meeting community needs...enhancing quality of life."

TO:	Community and Economic Development Committee
FROM:	Nikki Gerhard, Community Development Specialist
DATE:	September 14, 2016
RE:	City Program funding approval and City Proposals for 2017 Community Development Block Grant (CDBG) Funding

Per City of Appleton CDBG Policy (attached), the process of allocating 2017 CDBG funds has begun. An award estimate of \$528,000 was budgeted for the 2017 Program Year. \$528,000 is only an estimate and is subject to change upon adoption of the Federal budget. Also according to City CDBG Policy, the CEDC must approve allocations for City Programs. Those proposed amounts total \$180,572, and are listed in the 2017 Budget as follows:

Housing Rehabilitation Loan Program - **\$80,290** Neighborhood Program - **\$0** \*CDBG Administrative Costs for the Community and Economic Development Department - **\$40,282** Appleton Housing Authority - **\$60,000** 

\*includes funding for provision of HUD required Fair Housing Services

The balance of funds, \$347,428, is made available first to City departments and then community partners.

Proposals from City Departments were due September 2, 2016. One application was submitted. Upon receipt, the application was thoroughly reviewed by the Community and Economic Development Specialist for eligibility under HUD program regulations and it was determined that the proposed project was eligible.

The proposal from the Community & Economic Development Department is for "meeting community needs and enhancing quality of life" by creating a small home community that will expand housing options that are affordable for all residents of the City of Appleton. The entire proposal is attached.

CEDC is asked to make a recommendation to Common Council for the proposed allocations for City programs and funding for the proposal from the Community & Economic Development Department.

If you have any questions, please contact me at 832-6469 or nikki.gerhard@appleton.org. Thank you!

Community and Economic Development Department, 100 North Appleton Street, Appleton, WI 54911 (920) 832-6468







### Community Development Block Grant (CDBG) Policy Adopted 9/8/2008, Amended 5/24/2010, 10/3/2012, 12/19/2012, 7/15/2015

## I. PURPOSE

To outline the following aspects of the local Community Development Block Grant (CDBG) Program: a) elements to which the City of Appleton must adhere in order to comply with federal regulations; b) locally-established guidelines; and c) priorities for subrecipient and City Program activity.

## II. POLICY

The federal CDBG program was established with the passage of the Housing and Community Development Act of 1974. CDBG funds are distributed to eligible governmental units in two forms:

- (1). Entitlement grants directly to cities and counties, and;
- (2). State grants, which involve annual competitions for non-entitlement communities.

Since 1975, the City of Appleton has received CDBG funds as an entitlement community. The amount of CDBG funds received each year varies based on the appropriation approved by the U.S. Congress and the number of governmental units eligible to participate. While the federal fiscal year operates from October 1 to September 30, the City selected April 1 to March 31 as its CDBG fiscal year. This selection was made as the federal government generally does not release the aforementioned funds until springtime. Federal oversight lies within the U.S. Department of Housing & Urban Development (HUD).

## III. FEDERAL REGULATIONS

The citation reference from Title 24 Part 570 – Community Development Block Grants can be found in parentheses next to each heading below. Please view that section for more information on the respective item.

## A. Federal Eligibility (24 CFR 570.201)

CDBG funds may be used for the following basic eligible activities:

- (1). Acquisition
- (2). Disposition
- (3). Public Facilities/Improvements
- (4). Clearance/Remediation
- (5). Public Services
- (6). Interim Assistance
- (7). Payment of Non-Federal Share
- (8). Urban Renewal Completion
- (9). Relocation
- (10). Loss of Rental Income
- B. Ineligible Activities (24 CFR 570.207)

The following activities may not be assisted with CDBG funds:

- (1). Buildings (or portions thereof) for the General Conduct of Government
- (2). General Government Expenses
- (3). Political Activities

The following activities are not eligible for CDBG funding, but may be allowed under certain circumstances:

(1). Purchase of Equipment

(3). New Housing Construction(4). Income Payments

(11). Housing Services

(12). Privately-Owned Utilities

(15). Technical Assistance

(13). Homeownership Assistance

(18). Planning (24 CFR 570.205)

(14). Economic Development Assistance

(17). Rehabilitation/Preservation (24 CFR 570.202)

(16). Institutions of Higher Education

(19). Administration (24 CFR 570.206)

(2). Operating/Maintenance Expenses





# C. Special Economic Development Projects (24 CFR 570.203)

CDBG funds may be used for special economic development activities in addition to other activities. Special economic development activities include:

- (1). Acquisition, construction, reconstruction, rehabilitation or installation of commercial or industrial buildings, structures, and other real property equipment and improvements
- (2). Assistance to a private for-profit business, including, but not limited to, grants, loans, loan guarantees, interest supplements, technical assistance, and other forms of support, for any activity where the assistance is appropriate to carry out an economic development project
- (3). Economic development services, including, but not limited to, outreach efforts; screening of applicants; reviewing/underwriting applications; preparation of all necessary agreements; management of activities; and the screening, referral, and placement of applicants for employment

## D. National Objectives (24 CFR 570.208)

In order to qualify for funding, activities must meet one of three CDBG national objectives:

- (1). Low & Moderate Income (LMI) Benefit
  - a. <u>Area Benefit</u>: activities available for the benefit of all the residents in a particular area, where at least 51 percent of those residents are LMI persons.
  - b. <u>Limited Clientele</u>: activities benefiting a specific group (i.e. abused children, elderly persons, battered spouses), at least 51 percent of whom are LMI persons.
  - c. <u>Housing</u>: activities carried out for the purpose of providing or improving permanent residential structures that, upon completion, will be occupied by LMI households.
  - d. Job Creation/Retention: activities designed to create or retain permanent jobs where at least 51 percent of the jobs involve the employment of LMI persons.
- (2). Slum & Blight Removal
  - a. <u>Area Basis</u>: activities undertaken to eliminate specific conditions of blight, physical decay, or environmental contamination that are located in a designated area of distress, including acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, or rehabilitation. Rehabilitation must eliminate conditions that are detrimental to public health/safety; acquisition and relocation must be precursors to other activities that eliminate blight.
  - b. <u>Spot Basis</u>: activities undertaken to eliminate specific conditions of blight, physical decay, or environmental contamination at specific sites not located in designated blighted areas, including acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, or rehabilitation. Rehabilitation must eliminate conditions that are detrimental to public health/safety; acquisition and relocation must be precursors to other activities that eliminate blight.
- (3). Urgent Need
  - a. Activities designed to alleviate existing conditions of recent origin (18 months) that pose serious threats to the health and welfare of the community; this objective may only be used if the community cannot finance necessary activities with other sources.





## E. <u>Categorical Limits</u>

- (1). At least 70 percent of CDBG funds utilized during three consecutive program years, as specified by the grantee, must be expended for LMI benefit; the costs of planning and program administration are excluded from this calculation. (24 CFR 570.200(a)(3))
- (2). The amount of CDBG funds obligated for public service activities in each program year may not exceed 15 percent of the total entitlement grant for that program year, plus 15 percent of the program income received during the preceding program year. (24 CFR 570.201(e)(1))
- (3). The amount of CDBG funds obligated for planning and administration activities in each program year may not exceed 20 percent of the total entitlement grant for that program year plus the program income received during that program year. (24 CFR 570.200(g))

# F. Program Income (24 CFR 570.426)

The City may reuse any revenue generated from projects undertaken with CDBG funding towards other eligible activities within the entitlement community. Furthermore, any program income earned by a subrecipient or City Program may be retained by the subrecipient or City Program provided the income is treated as additional CDBG funds and thus subject to all applicable federal and local requirements.

# G. Fair Housing (24 CFR 570.601)

The Secretary of HUD requires that:

- (1). Grantees must administer all activities related to housing and community development in a manner to affirmatively further the policies of the Fair Housing Act. (Public Law 90-284)
- (2). Entitlement communities shall conduct an Analysis of Impediments to Fair Housing Choice every five years, take action to overcome the effects of the identified impediments and maintain records reflecting the analysis and related actions taken.

## H. Environmental Review Procedures (24 CFR 570.604)

The environmental review procedures outlined in 24 CFR part 58 must be completed for each CDBG subrecipient and City Program activity, as applicable.

## I. Faith-Based Activities (24 CFR 570.200)

Religious or faith-based organizations are eligible to participate in the CDBG program. Local government representatives and CDBG program administrators shall not discriminate against an organization on the basis of its religious affiliation.

# J. <u>Submission Requirements (24 CFR 570.302)</u>

CDBG entitlement communities must submit the following documents:

- (1). Action Plan  $\rightarrow$  annually
- (2). Consolidated Annual Performance and Evaluation Report (CAPER)  $\rightarrow$  annually

(3). Consolidated Plan  $\rightarrow$  every three to five years, as chosen by the entitlement community

Creation of these documents must follow HUD requirements for content and citizen participation (see the City of Appleton CDBG Citizen Participation Plan).

# K. Location of Activities (24 CFR 570.309)

CDBG funds may be awarded to an activity outside the jurisdiction of the entitlement community only if it can be determined that the activity directly benefits the entitlement community's residents. Documentation of these benefits must be provided before CDBG funds are awarded for the activity.





# L. <u>Conflict of Interest (24 CFR 570.611)</u>

No persons affiliated with the entitlement community (including subrecipients and City Programs) who exercise or have exercised any responsibilities with respect to CDBG programming, or who are in a position to participate in a decision-making process, may obtain a financial interest or benefit from a CDBG-assisted activity (including subcontracts), either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter.

# IV. LOCAL PROGRAM GUIDELINES

## A. Program Oversight

The Community and Economic Development Committee (CEDC) – composed of five aldermen appointed by the Mayor – serves as the jurisdiction for Common Council oversight of the CDBG Program. Local financial oversight lies with the City of Appleton Finance Department. Local administrative/programmatic oversight lies with the City of Appleton Community and Economic Development Department (CEDD).

# B. <u>Consolidated Plan Submission</u>

The City of Appleton has elected to submit a Consolidated Plan to HUD every five years. The Citizen Participation Plan provides for and encourages citizens to participate in the development of the Consolidated Plan, which will begin approximately one year before the required submittal date.

## C. <u>Definitions</u>

- Subrecipient an entity charged with implementation of one or more activities funded with Appleton CDBG dollars
  - community partner subrecipient local agencies awarded CDBG-funding to implement an eligible activity via a competitive application process
  - public services subrecipient local agencies awarded CDBG-funding to implement an eligible public service activity via a competitive application process
- Adjusted award the amount of CDBG funds available to City Programs and subrecipients after administration, fair housing, and audit allocations are deducted

## D. Local Categorical Limits

The following limits expand upon federal categorical limits associated with the CDBG program:

- (1). At least 70 percent of CDBG funds utilized over three program years must be expended for LMI benefit; this excludes planning/CDBG administration activities.
- (2). The amount of CDBG funds obligated for public service activities in each program year may not exceed 15 percent of the adjusted award for that year.
- (3). The amount of CDBG funds obligated for planning/CDBG administration activities in each program year may not exceed 20 percent of the total entitlement grant for that year.
- (4). Any single award will not be less than \$10,000.

# E. <u>Audit Requirements</u>

Section 2 Part 200 of the Code of Federal Regulations and the State Single Audit Guidelines require major state programs and federal programs to complete a single audit. The necessary amount for fulfilling these requirements will be identified by the Finance Department and the City's independent auditors. This amount will be deducted from the estimated amount available for the program year and not included in the estimates of the adjusted award.





# F. Fair Housing Services

In keeping with the spirit of federal fair housing requirements, an annual allocation for fair housing services will be approved. This activity will be reported as an administrative expense, which claims no benefit. The City of Appleton will utilize the award to contract with an independent entity qualified to provide residents with a variety of fair housing services. This amount will be deducted from the estimated amount available for the program year and not included in the estimates of the adjusted award.

# G. Program Administration

HUD requires entitlement communities to provide for efficient and adequate administration of CDBG programming. Administration costs may only include: salary/fringe, necessary training/travel, supplies and telephone/postage, in addition to fair housing services and audit costs. The necessary amount for fulfilling this requirement will be identified by the Community and Economic Development and Finance Departments. This amount will be deducted from the estimated amount available for the program year and not included in the estimates of the adjusted award.

# H. Annual Allocation of CDBG Funding

The City of Appleton's Program Year begins April 1 and concludes March 31 of the following year. Each program year, administration, audit and fair housing costs, along with adequate funding for the Homeowner Rehabilitation Loan Program, the Neighborhood Program and Appleton Housing Authority will be subtracted from the annual entitlement award amount to determine the adjusted award. The adjusted award will first be available to City of Appleton Departments/Programs/component units that wish to undertake projects. After the City allocation process is complete, any remaining funds may be allocated to community partner applicants.

## I. <u>City Allocation Process</u>

Each year adequate funding will be allocated through the City Budget process to the following: Homeowner Rehabilitation Loan Program, Neighborhood Program, Administration Costs and Appleton Housing Authority. Then, other City of Appleton Departments will have the opportunity to submit an application for CDBG funding. The application will include information relating to goals, outputs, budget/financing, detailed activity descriptions, capacity and performance. CEDD staff, per HUD rules and regulations, will perform an administrative review of each plan to ensure that:

- 1. Proposed activities are included within the listing of eligible activities (24 CFR 570.201)
- 2. Proposed activities do not fall within a category of explicitly ineligible activities (24 CFR 570.207)
- 3. Proposed activities will meet one of the national objectives of the program (24 CFR 570.200)
- 4. Proposed activities will address priority needs as identified in the Consolidated Plan

Upon completion of the administrative review, the plans will be presented to the CEDC. CEDC will also review the submitted plans to ensure the proposed activities meet the four standards listed above and allocate adequate funds for each plan. CEDC's recommendation will then be presented to the Common Council for approval.

# J. <u>Community Partner Subrecipient Allocation Process</u>

The community partner application process will begin after allocations for City applications have been approved, and end with recommended allocations being announced after Council approval. Applications will be made available for approximately one month and should be submitted to the CEDD. All applications must be received by the announced deadline; no exceptions will be made. CEDD staff will perform an administrative review of each proposal, per HUD rules and regulations, to ensure the four





standards listed under letter E. above, will be met if proposed activities are funded.

Upon completion of the administrative review, the proposals will be presented to the CDBG Advisory Board which will review and make funding recommendations for each proposal. This Board will consist of the following members:

- 1. Mayor
- 2. Common Council President
- 3. Chairperson of the Community and Economic Development Committee or committee designee
- 4. Chairperson of the Appleton Redevelopment Authority or committee designee
- 5. Representative from an Experienced Outside Funding Agency on a rotating basis (i.e. United Way, Community Foundation, JJ Keller Foundation, U.S. Oil Basic Needs Partnership)
- 6. Citizen member from the City Plan Commission

CEDD staff will supply the Board with applications and all appropriate guidelines along with a summary of each proposal, and an explanation of the proposal score sheet. Board members are asked to allocate funding among the applicants and return their allocations to CEDD staff who will compile all results and present allocation recommendations at a Board meeting during which allocation amounts will be finalized. In completing their funding recommendation, the Board will utilize an estimated CDBG entitlement award dollar amount, which will be calculated based on past awards and any available information on HUD's future funding strategies. Funding recommendations from this Board will be presented as an Action Item to the CEDC. CEDC's recommendation will then be presented to the Common Council for final approval.

## K. Estimated vs. Actual Entitlement Award

If there is a differential between the estimated award and the actual award, the CDBG Advisory Board will be consulted and their recommendations will be presented to CEDC and Council for approval.

## L. <u>Subrecipient Agreement/Letter of Understanding/Training Session</u>

Community partner subrecipients of CDBG funds must enter into a subrecipient agreement with the City of Appleton. This subrecipient agreement serves as a formal contract addressing the various policies outlined in this document, in addition to contract amount/term, reimbursement requests, accomplishment reporting, monitoring, financial management guidelines, conflict of interest, and additional federal standards, including lead-based paint regulations and the Davis Bacon Act. Furthermore, each City Program receiving CDBG funds must sign a Letter of Understanding (LOU) indicating an understanding of the items above. To ensure all parties understand the requirements of their agreement or LOU, a mandatory training session will be held with new subrecipients before funds are released. Technical assistance from staff will be available to all subrecipients throughout the program year.

## M. Statement of Work

All subrecipients and City Programs shall submit a concise Statement of Work that illustrates an implementation plan for their CDBG activity. This Statement, which will be attached to the subrecipient agreement/LOU includes: national objective claimed, activity descriptions, intended beneficiaries (number and type), detailed budget and location(s) of program-related activity.

## N. <u>Report Submissions</u>

All subrecipients and City Programs are required to submit a report of their accomplishments with each payment request during the program year when applicable, as well as an Annual Report by April 15th, which is a comprehensive report covering the agreed upon objectives, activities and expenditures for the entire





contract period. If said reports are not attached to payment requests when required, payments will be withheld until the report is submitted.

## O. Change of Use

If a subrecipient or City Program wishes to utilize funds for an activity not identified on their original application, they are required to submit a detailed letter to the CEDD explaining the reasoning for and amount of the proposed change and a public comment period may be held per the Citizen Participation Plan.

## P. Displacement/Relocation

Due to the potential liability for long-term assistance and burdens placed on affected tenants, the City of Appleton will avoid funding CDBG projects that involve permanent residential displacement or business relocation unless displacement/relocation prove to be the only means available to correct a public health/safety hazard or other critical condition.

## Q. Procurement

The City of Appleton Procurement Policy applies to all CDBG activities, including both City Programs and subrecipients that involve the purchase of equipment, materials, supplies and/or services. A copy of this policy will be distributed to all subrecipients.

## R. <u>Audits</u>

All subrecipients are required to submit one copy of their audited financial statement immediately following the end of their fiscal year during which CDBG funds are received, unless an alternate arrangement has been made with the City of Appleton Finance Department. CDBG applications may include audit costs as a reimbursable expense.

## S. <u>Disputes</u>

Any dispute concerning a question of fact arising under a subrecipient program or City Program shall be resolved by CEDD staff, who shall relay his/her decision in writing to the subrecipient or City Program, in addition to furnishing a copy to the Mayor and the CEDC. The decision of CEDD staff shall be final and conclusive unless the subrecipient or City Program furnishes a written appeal to the CEDC within ten days of the date of receipt of such copy. The decision of the CEDC in such appeals shall be final and conclusive unless appealed to a court of competent jurisdiction within 30 days of receipt of the CEDC's decision.

## T. <u>Unspent Grant Funds</u>

Any uncommitted CDBG funds remaining at the end of the program year will be reprogrammed for use in the subsequent program year. The subrecipient shall submit a carryover request, including both documentation of plans for expending funds and a timeline for the expenditure, to CEDD staff by April 15. If any unspent grant funds remain after September 30, CEDD staff will meet with the subrecipient to determine if further action needs to be taken to expedite the expenditure of funds.

## U. <u>Termination</u>

If the subrecipient or City Program fails to fulfill, in timely and proper manner, its obligations under the Statement of Work, or if they violate any stipulations contained within the subrecipient agreement/LOU, the City has the right to terminate funding of their program. Written notice will be delivered at least 30 days before the termination.



## City of Appleton COMMUNITY DEVELOPMENT BLOCK GRANT



## V. <u>Examination of Records/Monitoring</u>

The subrecipient and City Program shall maintain records (including books, documentation and other evidence) pertaining to the costs of carrying out their activity to the extent of detail that will adequately reflect net costs, direct and indirect labor, materials, equipment, supplies/services, and other expenses. Authorized representatives of the City or HUD shall have access to subrecipient and City Program records at reasonable times of the business day for inspection, audit or reproduction. Subrecipients and City Programs must make these records available throughout the program year and four years after it expires. Furthermore, CEDD staff may schedule monitoring visits with the subrecipient to evaluate the progress/performance of the program and provide technical assistance.

### W. Financial Management Systems

Subrecipients and City Programs must employ financial management systems that are capable of generating regular financial status reports indicating the dollar amount allocated (including budget revisions), amount obligated, and amount expended for each activity. The system must permit the comparison of actual expenditures and revenues against budgeted amounts. The City must be able to isolate/trace every CDBG dollar received.

#### X. Payment Requests

Community partner subrecipients and City Programs will submit requests for payment with attached supporting documentation to the CEDD. Payment requests shall be allowed on a reimbursement basis (i.e. only after expenditures have been incurred) and shall be reviewed to ensure the expenditures are in conformity with the use of funds as described in the Statement of Work. If source documentation is deemed inadequate by Staff, all payments will be withheld until all required documents have been submitted. Payment requests received and approved will be processed and a check issued in accordance with the City of Appleton Finance Department weekly pay cycle. All payment requests must contain an original signature.

#### Y. <u>Program Income</u>

Any program income (as defined under applicable federal regulations) gained from any activity of the subrecipient may be retained by the subrecipient or City Program provided the income is treated as additional CDBG funds subject to all applicable requirements governing the use of CDBG funds. Anticipated program income must be documented and described in the subrecipient or City Program proposal/application. Furthermore, any and all program income received must be reported to the City of Appleton's Community and Economic Development and Finance Departments, unless otherwise specified in this contract.

#### Z. <u>CDBG Activity Promotion</u>

All subrecipients and City Programs are required to participate in promotion of the City of Appleton CDBG Program. Expectations will be outlined by staff at the beginning of the program year and may include, but are not limited to:

- Inclusion of the Appleton/CDBG logo in materials/at project sites
- Mentorship of a subrecipient new to the CDBG Program
- Participation in a CDBG Open House to showcase grant activities

## V. APPLICATION/PROPOSAL EVALUATION CRITERIA

#### A. General

In order to receive CDBG funding, subrecipient and City Programs must meet a priority need, as identified



## City of Appleton COMMUNITY DEVELOPMENT BLOCK GRANT



in the Five-Year Consolidated Plan. Additional preference, however, will be given to CDBG applicant activities that meet one or more of the following criteria:

- (1). Seek a one-time use of CDBG funding
- (2). Benefit residents of LMI census tracts (population at least 46.7 percent LMI)
- (3). Will result in additional housing units being placed on the tax roll
- (4). Demonstrate secured complementary sources of funding (i.e. leverage) and/or strong efforts to solicit and secure complementary funding.
- (5). Serve special needs populations, including, but not limited to:
  - a. Elderly/frail elderly
  - b. Persons with disabilities (developmental and physical)
  - c. Persons with HIV/AIDS and their families
  - d. Persons seeking solutions to alcohol and drug addiction

#### B. <u>Public Services (subject to 15 percent cap)</u>

Preference will be given to Public Service CDBG applicants whose activities meet one or more of the following criteria:

- (1). Program service costs one time use
- (2). Administrative expenses one time use
- (3). Program service costs continual use
- (4). Administrative expenses continual use



RCVd 9/1/16 (2

#### **PART A – CONTACT INFORMATION**

- 1. Program/Project Name: Community and Economic Development Housing Project
- 2. Contact Person Name/Title: Karen Harkness/Director
- 3. City Department: Community and Economic Development
- 4. Supervisor Name/Title (if applicable):
- 5. Telephone Number: (920) 832-6468
- 6. Fax Number: (920) 832-5994
- 7. Email Address: Karen.Harkness@appleton.org

#### **PART B - INDICATORS**

1. To be eligible for funding, the program/project for which you are requesting funding <u>must</u> address <u>one</u> <u>national objective</u>.

1

The project meets the needs of low- and moderate-income persons. At least 51 percent of the participants or beneficiaries of the project will meet the low- and moderate-income guidelines listed in Exhibit A.

The project is located in a low- and moderate-income area. In this case, the project must be available to all the residents of one of the areas identified on the map in Exhibit B and primarily residential. Typical activities funded are area street improvements, water and sewer lines, parks and other public facilities.

The project meets the needs of one of the following specific groups of people (low-mod limited clientele): abused children, elderly persons, battered spouses, homeless persons, severely disabled persons, illiterate adults, persons living with AIDS and migrant farm workers.

The project provides housing assistance to low- and moderate-income households. Fundable activities include housing rehabilitation, acquisition of property for housing and homeownership assistance.

The project creates or retains jobs for low- and moderate-income persons.

The project eliminates specific instances of blight or physical decay. The only activities to be funded under this category are acquisition, demolition or rehabilitation of buildings.

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Ζ.	Program category:	
	X Acquisition	🔀 Housing
	Administration/Planning	Public Facilities
	Economic Development	Public Services
3.	Priority need(s) met (use list provided in Exhibit	C):
	a) <u>Acquisition for new housing</u>	
	b) Improve and maintain housing stock	
	c) <u>Neighborhood revitalization</u>	
4.	Proposed output type and number (select more t	han one if necessary):
	persons directly served	5 housing units rehabilitated/acquired
	$\boxed{5}$ households directly served	jobs created/retained
	businesses rehabilitated	other ( <i>specify</i> :)
5.	Check one HUD-defined objective that best rela	tes to your potential CDBG-funded program:
	$\Box \underline{Create Suitable Living Environments} \rightarrow address$	issues in daily life (social barriers, physical barriers, etc.)
	$\boxed{\qquad Provide Decent Affordable Housing} \rightarrow address = 10000000000000000000000000000000000$	individual, family, or neighborhood housing needs
	$\Box$ Expand Economic Opportunity $\rightarrow$ address econ	omic development (job creation, commercial rehab, etc.)

6. Check one HUD-defined outcome that best relates to your potential CDBG-funded program:

- $\square$  Availability/Accessibility  $\rightarrow$  make basic services more readily available/accessible to low-income persons
- $\bigwedge$  Affordability  $\rightarrow$  make basic services more affordable for low-income persons in a variety of ways
- Sustainability  $\rightarrow$  improve the overall viability of communities (blight elimination, LMI benefits, etc.)

#### **PART C – FUNDING INFORMATION**

(limit narrative responses to the space provided)

- 1. CDBG funds requested (minimum of \$10,000): \$200,000
- 2. Percent of total program/project budget that will be covered by this CDBG award: 33%
- 3. Is it anticipated that CDBG funding will be needed for this activity in the future? If so, describe the reason and plan for future funds. There may be additional requests in 2018 and possibly 2019, particularly if we increase the put

There may be additional requests in 2018 and possibly 2019, particularly if we increase the number of units. This will depend on the finalized site, cost of acquisition and infrastructure.



#### 4. Amounts of prior year CDBG awards received by your department:

2016-2017 = for this particular project/\$535,325 as a department 2015-2016 = for this particular project/\$523,813 as a department 2014-2015 = for this particular project/\$525,200 as a department

#### 5. Detailed program/project budget for CDBG funds (Please be as detailed and specific as possible)

Program/Project Activity	CDBG Award Allotment		
Salaries	\$		
Fringe	\$		
Office space (program only)	\$		
Utilities	\$		
Communications	\$		
Copies/Printing	\$		
Supplies and Materials	\$		
Mileage	\$		
Audit	\$		
Indirect costs (specify)	\$		
Other (specify): Acquisition of land/infrastructure	\$200,000		
Other (specify)	\$		
TOTAL:	\$200,000		

6. If using the funds for wages/salaries, please list the titles of the positions and the percentage of the total wages/salary for each that will be funded by this CDBG award.

N/A-No salaries will be funded with this project

7. If the entire amount of your request is not allocated, will the activity still be possible? And if so, how will the activity be altered to allow for the smaller award?

Yes, additional funding from other sources will be sought. The project may be reduced in scope.

- Status Leverage Source (i.e. general funds, capital funds, etc.) Amount \$250,000 in process a) Other Federal/State Funding \$50,000 in process b) Private Donations \$100,000 in process c) In-Kind Donations from other agencies \$ (select one) d) e) \$ (select one)
- 8. SPECIFIC major sources that will/may also fund this program/project in 2017:

# 9. Describe your efforts to secure additional/complementary funding for your program/project. If this program/project will generate program income, please note the amount and how it will be spent.

Private Donations and In-Kind Donations from other agencies have already been offered for this project. Although no specific amounts have been committed yet, there are enough in-kind offers to fill the gaps for funding this project, as necessary. The intent is to apply for other federal and/or State funding, as needed, to fund the development/construction portion of the project. Due to the community support and interest in this project, those funds may not be necessary. The project is not expected to generate program income.

#### **PART D – PROJECT DESCRIPTION**

(limit narrative responses to the space provided)

1. Describe the activities to be carried out through this grant request and how this activity relates to the mission of your department and the City.

The City of Appleton's mission is "meeting community needs and enhancing quality of life." Our Department delivers programs and services to fulfill the City's mission and a recent collaboration with local agencies produced the Project RUSH (Research to Understand and Solve Homelessness) report that illustrates specific needs in our community. Our proposal is to address the City's mission and Project RUSH through the creation of a small home community. This will expand housing options that are affordable for all residents of the City of Appleton.

2. Describe how the project meets the national objective and how it fits into the program category, both chosen above (Part B).

The objective of the project is to provide decent affordable housing which would serve households where at least 51% of the beneficiaries are low and moderate-income.

3. Identify the projected target population the proposed CDBG-funded program/project will serve (i.e. age, race, residency, disability, income level, other unique characteristics/information). The projected target population will be primarily low- to moderate-income households with incomes below 80% CMI. It is anticipated that the majority of the beneficiaries will also be elderly, disabled, and/or minorities. However, the housing will not be limited to that clientele.



4. Describe how this program/project is unique and/or coordinates with others to avoid duplication of services and meets the high priority needs of the community as chosen in Part B.

This project will specifically address a housing need of the community as identified in the Project RUSH study. The goal is to develop 5 affordable housing units in a small home community that will be permanently affordable to low- and moderate-income residents of the City of Appleton. The intent is to acquire and clear the land and prepare it for development with CDBG funds. Non-profit housing agencies will then work with City staff to develop the housing for that site as deemed appropriate by the City of Appleton. Our department may be involved in helping to secure additional funding from other state and federal resources for the development of that housing, if necessary.

#### **PART E – OUTCOMES**

#### (limit narrative responses to the space provided)

1. Describe how the potential CDBG-funded program relates to the outcome chosen above (Part B). The project will provide new decent, safe, and affordable housing in Appleton, constructed in a way that will ensure the dwelling will retain value, as well as improve blighted areas of the City.

2. Briefly describe data that will be collected and/or analysis used to measure success in achieving the objective and outcome identified above (Part B) for the target population. The number of housing units constructed, the number of low- to moderate- income residents affected, and the elimination of blighted neighborhoods will determine the success of this project.

#### **PART F – ATTACHMENTS**

- 1. Please attach the following information relating to your program/project:
  - Detailed Budget Breakdown (most current)
  - Department Structure Chart
  - N/A Descriptive Material (brochures, flyers, fact sheets, etc.)

#### **PART G – AUTHORIZATION**

ame of Department Head

E ZIONEMUC Dave Lopment MMUAD Title of Department Head

Signature of Department Head

Date



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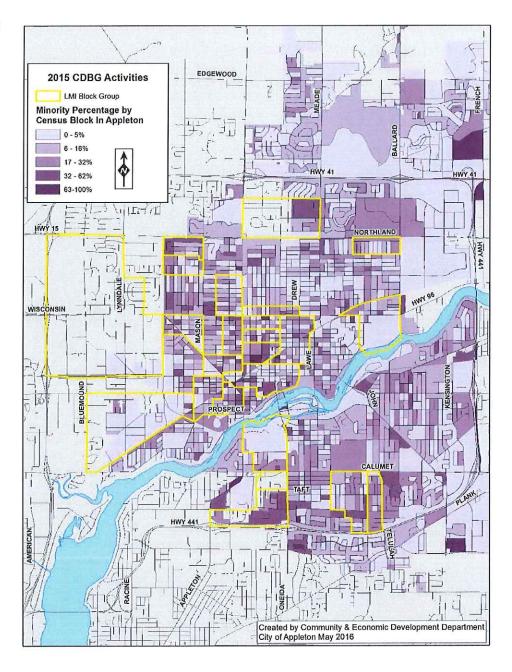
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## EXHIBIT A: FY 2016 Income Limits Documentation System Outagamie County, Wisconsin

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FY 2015 Income Limit Category	1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
Extremely Low	\$	\$	\$	\$	2			
(30%)	15,550	17,750	20,160	24,300	\$ 28,440	\$ 32,580	\$ 36,730	\$ 40,890
Very Low (50%)	ې 25,850	ې 29.550	ې 33,250	ې 36,900	\$ 39,900	\$ 42,850	\$ 45,800	\$ 48,750
101, 2011 (30/0)	\$	\$	\$	\$	÷ 20,000	÷ .1,000	+ .5,000	+ .5,700
Low (80%)	41,350	47,250	53,150	59,050	\$ 63,800	\$ 68,500	\$ 73,250	\$ 77,950

NOTE: Outagamie County is part of the Appleton, WI MSA, so all information presented here applies to all of the Appleton, WI MSA. The Appleton, WI MSA contains the following areas: Calumet County, WI; and Outagamie County, WI.

EXHIBIT B





## **EXHIBIT C: Priority Needs – City of Appleton**

As an Entitlement Community, the City of Appleton provides grant assistance for local projects through use of Community Development Block Grants (CDBG). Each year, organizations may apply for funding to implement activities that meet the goals and objectives as defined in the City's Five-Year Consolidated Plan. The priority needs for 2015-2019, around which these goals revolve, are included in the following table:

Five-Year Goals	Five-Year Goal Outcomes
Improve and maintain housing stock	175 owner-occupied homes rehabilitated
Homebuyer assistance	40 first-time homebuyers receive downpayment assistance
Rental rehabilitation	40 rental units rehabilitated
Acquisition for new housing	15 new housing units
Public facilities improvement and maintenance	900 persons assisted through allocations to community based agencies for facility improvement and maintenance activities
Neighborhood revitalization	10,000 persons assisted through various public facility improvements
Public services	5,500 persons assisted through provision of various public services

**Goals and Outcomes Summary** 

Project Budget - CEDD Housing Project

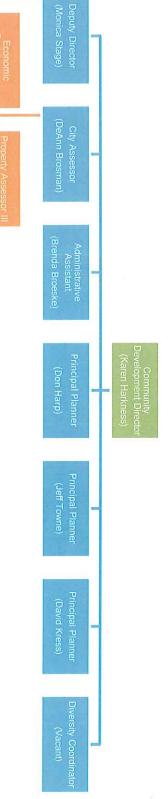
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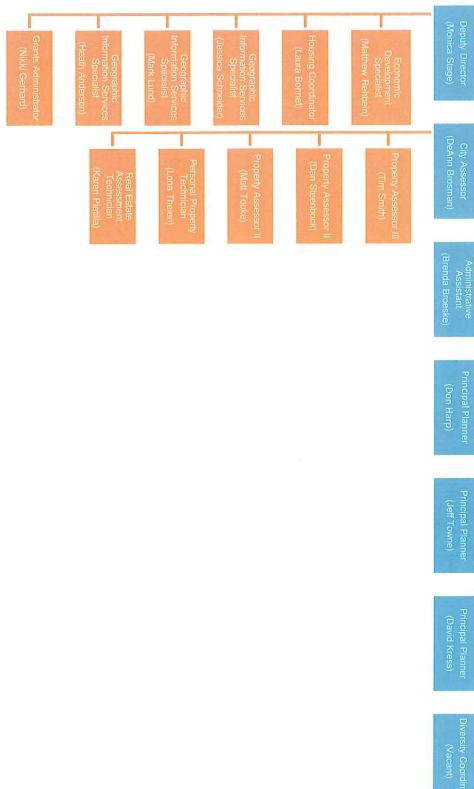
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Site Acquisition/Prep (CDBG Request)	\$ 200,000
In-Kind Donations	\$ 100,000
Private Donations	\$ 50,000
Federal/State Funding	\$ 250,000
Total Project Budget	\$ 600,000

2







\$

