

The City of Bloomington

HENNEPIN COUNTY CONSORTIUM

CONSOLIDATED PLAN FY 2015-2019

and ANNUAL ACTION PLAN FY 2015

DRAFT



Consortium Members:
Urban Hennepin County
Bloomington · Eden Prairie
Minnetonka · Plymouth



Consolidated Plan

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Executive Summary

ES-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The City of Bloomington will utilize Community Development Block Grant (CDBG) funds to achieve a number of goals that best serve the citizens of Bloomington. The City will use its entitlement funds to achieve the goals/outcomes that are identified within this plan. The City has incorporated performance measures into the Consolidated and Action Plan to ensure that the Plan is results orientated and that it meets its one and five year goals. The planned activities serve a large number of low/moderate income households. Overall, at least 80 percent of the grant will be expended on activities for low/moderate income households in Bloomington.

2. Summary of the objectives and outcomes identified in the Plan

The City will carry out activities that will provide for the preservation of the City's housing stock, provide essential services to seniors and to support Fair Housing activities.

The activity to receive the largest amount of funding is the single-family rehabilitation program which serves low/moderate income homeowners with low interest loans to repair/update their homes. The rehabilitation loan program is coupled with the lead based paint activity to assist in the abatement of lead hazards in pre-1978 homes utilizing CDBG funds. In this way, the City is ensuring that no threats remain to the health of occupants from lead paint. This activity serves low/moderate income households at or below 80% median.

The City will provide CDBG funds to Senior Community Service's Household and Maintenance for the Elderly (H.O.M.E.) Program to provide outside maintenance and home making services to low/moderate income seniors. This is an important service that allows seniors to continue to reside in their homes.

Lastly, the City contributes to the Hennepin County CDBG Consortium for Fair Housing Services. The City will allocate funds for the continuation of Fair Housing Services in suburban Hennepin County (including Bloomington). These funds may be used for education and research, housing discrimination testing and enforcement and Fair Housing counseling and clearinghouse activities.

3. Evaluation of past performance

The City has a long history of actively working to preserve and upgrade the condition of it's' neighborhoods. The CDBG-funded single-family rehabilitation loan program (including lead-based paint abatement) have been a very successful and important part of these efforts.

In addition, the City has a long-standing commitment to serving its' senior population. The CDBG funded H.O.M.E. program through Senior Community services has been a very successful and important part of these efforts. The City will continue this activity given the strong need in the community and the past performance of Senior Community Services.

Fair Housing continues to be a focus of the City of Bloomington. Past funding has provided for paired testing, among other activities that are coordinated by the lead agency of the consortium, Hennepin County. The City, as part of the consortium, focuses this activity based upon the results of the Analysis of Impediments that is completed by the metro-wide efforts of the Fair Housing Implementation Council (FHIC).

4. Summary of citizen participation process and consultation process

The Bloomington Plan is part of the Hennepin County Consortium Plan. Bloomington's Plan will be made available for public comment 30 days prior to going before the Hennepin County Board for a public hearing. In addition, prior to the County's hearing, the Bloomington City Council will hold a public hearing for approval of the plan and to receive any public comments.

The Consortium Action Plan provides the complete Citizen Participation Plan for all members to follow, including Bloomington. The Citizen Participation Plan details the efforts to broaden public participation in the development of the Action Plan. In addition to the Consortium's hearing and comment period, the City of Bloomington provides two opportunities for public comments. The City's Action Plan is a subject of public hearings at both the City's HRA and Council prior to adoption and submission to be included in the Hennepin County Consortium Action Plan.

Please note that all citizens and all other interested parties are also able to comment on Bloomington's Action Plan through the Hennepin County Consortium's public comment and hearing process.

In an ongoing effort to determine the best use of this limited resource, City staff may meet with interested businesses, developers, community and faith-based organizations to review specific proposals for utilization of the City's CDBG funds. Unfortunately, the City is unable to fund most of the proposals due to decreasing annual CDBG funds from HUD and the need to fund existing high-impact activities (such as single-family rehabilitation and H.O.M.E. maintenance for the elderly).

The Human Services Department has staff that has been trained by the local United Way to assess the need of homeless persons within the City and make recommendations to the City Council on how to best utilize City resources to respond to found needs. Human Services also operates a help line which connects people with needed services, including homeless, at the City and County level. These organizations and service providers receive over \$130,000 in funding. The primary source of these public service funds is the City's own General Fund.

5. Summary of public comments

No public comments were received at the hearing held by the Bloomington City Council on March 18, 2015. All interested parties are also able to provide comment on the entire plan through Hennepin County's comment period and public hearing process.

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

Not applicable. No comments were received.

7. Summary

In summary, the City continues to serve as many low/moderate income households as possible, while given that the funding for the City's grant has been reduced since the early 2000's This reduced funding, could impact the City's ability to keep up with the needs of low/moderate income households in the City. The City is hopeful that funding will soon be restored to former levels or increased, so it may initiate new projects and services to low and moderate income households.

The Process

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

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

Agency Role	Name	Department/Agency
CDBG Administrator	BLOOMINGTON	Housing and Redevelopment Authority (HRA)

Table 1– Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.200(b), 91.215(I)

1. Introduction

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

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

These activities are coordinated by Hennepin County at the local level. Where appropriate, the city may refer organizations and services agencies to each other to coordinate efforts.

In addition, the city's HRA operates a Housing Choice Voucher program of 551 units that serves a wide variety of low-income populations, including elderly, the disabled and families. The HRA's staff is trained to assist participants to connect with services such as mental health and public health services.

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

This coordination is completed by the Minneapolis/Hennepin County Continuum of Care and the Office to End Homelessness. In addition, the City, through its Human Services Division, provides essential referrals to homeless persons to connect them to services.

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

Not applicable. Bloomington does not receive ESG funds. Please refer to the Hennepin County section on this.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2– Agencies, groups, organizations who participated

1	Agency/Group/Organization	Senior Community Services (SCS)
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency's CEO and other staff were interviewed and briefed on the plan activities proposed by the City of Bloomington.
2	Agency/Group/Organization	Cornerstone Advocacy
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency's Executive Director and other staff were interviewed and briefed on the plan and activities proposed by the City of Bloomington.
3	Agency/Group/Organization	HOME Line
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through Hennepin County and the City's process for funding of non-profits.
4	Agency/Group/Organization	COMMUNITY ACTION PARTNERSHIP OF SUBURBAN HENNEPIN
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through Hennepin County and the City's process for funding of non-profits.
5	Agency/Group/Organization	City of Bloomington
	Agency/Group/Organization Type	PHA Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City, through its HRA was consulted for the need assessment and Goal setting process for the Consolidated Plan.
6	Agency/Group/Organization	Metropolitan Council - Metro HRA
	Agency/Group/Organization Type	Housing PHA Services - Housing Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Bloomington and the Metropolitan Council regularly coordinate and communicate regarding economic/community development and affordable housing issues including coordination between the Housing Policy Plan and the Consolidated Plan. Goals in the Consolidated Plan may overlap with Metropolitan Council affordable housing goals.

7	Agency/Group/Organization	Office to End Homelessness
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders Foundation Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Office to End Homelessness has played a key role in the development of all housing and homeless-related sections of the plan. Coordination will continue throughout the plan.
8	Agency/Group/Organization	Hennepin County Human Services and Public Health Department.
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - Federal Other government - State Other government - County Regional organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consortium staff met with staff from Hennepin County Human Services and Public Health Department (HSPHD) regarding market conditions, housing needs, gaps in service, and recommendations for priorities. Additionally, HSPHD staff participates in HOME application reviews.

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

Bloomington was actively involved in the Consortium consultation, development, and citizen participation process led by Hennepin County. All agency types were consulted through the Consortium's Consolidated Plan development and goal-setting process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Hennepin County	The Office to End Homelessness has played a key role in the development of all housing and homeless-related sections of the plan. Coordination will continue throughout the plan.
City of Bloomington Comprehensive Plan	City of Bloomington	The city's comprehensive plan lays out development of the city for the next 30 years. It also identifies affordable housing efforts within the city, which may be impacted by the city's CDBG efforts.

Table 3– Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City of Bloomington works closely with Hennepin County Consortium in the implementation of the Consolidated Plan. The Consortium includes Hennepin County and several units of local government, including Minnetonka and Eden Prairie. Staff representing each member of the Consortium meet regularly to coordinate the creation and implementation of the Consolidated Plan, and to share outcomes from each of the cities' housing and economic development programs. The City of Bloomington also works with a variety of State Agencies on different aspects of the plan, such as the Minnesota Housing Finance Agency, the Department of Employment and Economic Development (DEED) and the Minnesota Department of Health (MDH). Coordination with the State may include utilizing state funding programs for economic development, consulting with state agencies on data and regulations for lead-based paint and environmental review.

Narrative

PR-15 Citizen Participation - 91.401, 91.105, 91.200(c)

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

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

The City of Bloomington does significant outreach to citizens and interested agencies to broaden public participation in the development and approval of the Plan. In addition to the Consortium outreach, the City sought input through its own process to develop the plan through the solicitation of comments and public hearings.

The City of Bloomington's Plan, as part of the Consortium's entire Plan, was made available for public comment 30 days prior to going before the Hennepin County Board for a public hearing on April 21, 2015. This is the final public hearing on the consortiums plan, included the City of Bloomington's plan.

In addition and prior to the Consortium's hearing, the Bloomington City Council held a public hearing for comments on the development and approval of the City's plan. This hearing also serves to receive any comments from the public or interested organizations prior to submission to the Hennepin County for inclusion it the Consortiums Plan.

The Consortium's Plan provides the complete Citizen Participation Plan for all members to follow, including Bloomington. The Citizen Participation Plan details the efforts to broaden public participation in the development of the Action Plan.

In addition to the Consortium's hearing and comment period, the City of Bloomington provides two opportunities for public comments on the plan and its development. The City's Action Plan is a subject of public hearings at both the City's HRA and Council prior to adoption and submission to be included in the Hennepin County Consortium Action Plan.

Please note that all citizens and all other interested parties are able to comment on the development of Bloomington's Action Plan by the submission of written comments, public testimony at either the HRA meeting or the City Council's public hearing. In addition, any member of the public or interested organization may offer input or comment through the Hennepin County Consortium's public comment and hearing process. Lastly, Hennepin County's an online survey of Hennepin County residents to provide feedback on the Consolidated Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	The City of Bloomington's Housing and Redevelopment Authority held a public meeting at 5:30 p.m. on March 10, 2015 to accept comments on the development of the plan and to recommend the plan for approval to the City Council. The HRA's agenda and meeting schedule is posted on the City's website, including the plan or summary of the plan. Comments received on the plan will be considered for this or future plans.	No comments were received at the HRA's meeting regarding this plan.	Not applicable. No comments were received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non-targeted/broad community	<p>The City of Bloomington's City Council held a public hearing at 7:00 p.m. on March 10, 2015 to accept comments on development of the plan and to recommend the plan for approval to HUD and Hennepin County, the lead agency of the consortium. Notice of the hearing was published ten or more days prior to the hearing. The City Council's meeting dates, times and agendas are made available on the City's website: www.BloomingtonMN.gov, including the plan or summary of the plan.</p>	No comments were received.	Not applicable. No comments were received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Newspaper Ad	Non-targeted/broad community	The City of Bloomington's City Council held a public hearing at 7:00 p.m. on March 10, 2015 to accept comments on the development of the plan and to recommend the plan for approval to HUD and Hennepin County, the lead agency of the consortium. Notice of the hearing was published ten or more days prior to the hearing. The City Council's meeting dates, times and agendas are made available on the City's website: www.BloomingtonMN.gov , including the plan or summary of the plan.	No comments were received.	Not applicable. No comments were received.	

Table 4– Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The city, through its own Comprehensive Plan, Housing Goals/Housing Action Plan with the Metropolitan Council, and annual CDBG funding, is regularly reviewing the community's needs for low to moderate income persons.

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Due to the limited funding available through its' CDBG grant, the City of Bloomington has determined that Public Facilities are not a high need for these limited funds.

How were these needs determined?

The City of Bloomington has chosen over many years to focus the limited funds available from CDBG on the activities described in this plan.

Describe the jurisdiction's need for Public Improvements:

Due to the limited funding available through its' CDBG grant, the City of Bloomington has determined that Public Improvements are not a high need for these limited funds.

How were these needs determined?

The City of Bloomington has chosen over many years to focus the limited funds available from CDBG on the activities described in this plan.

Describe the jurisdiction's need for Public Services:

Due to the limited funding available though it's CDBG grant, the City of Bloomington has long focused its' CDBG Public Service funding on serving the growing needs of seniors in the community.

How were these needs determined?

The City of Bloomington has chosen over many years to focus the limited funds available from CDBG on the Household and Outside Maintenance for Elderly (H.O.M.E.) program to serve the growing senior community in Bloomington.

Based on the needs analysis above, describe the State's needs in Colonias

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The city, through its Comprehensive Plan and Housing Goals/Housing Action Plan with the Metropolitan Council, to regularly review the market. The review helps the city to determine what areas it needs to focus on in order to make housing and other services available to all residents of the community.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

This section relates to non-housing community development assets. Cities seeking assistance under the Community Development Block Grant (CDBG) program are required to provide a concise summary of the priority non-housing community development needs eligible for assistance under CDBG eligibility categories, in accordance with a table prescribed by HUD.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	62	3	0	0	0
Arts, Entertainment, Accommodations	3,905	9,308	10	11	1
Construction	928	1,287	2	2	-1
Education and Health Care Services	6,599	8,008	17	9	-8
Finance, Insurance, and Real Estate	4,424	12,734	12	15	3
Information	1,027	3,315	3	4	1
Manufacturing	3,500	5,406	9	6	-3
Other Services	1,510	1,878	4	2	-2
Professional, Scientific, Management Services	4,843	12,349	13	15	2
Public Administration	0	0	0	0	0
Retail Trade	4,587	11,848	12	14	2
Transportation and Warehousing	1,012	1,123	3	1	-1
Wholesale Trade	2,524	10,375	7	12	6
Total	34,921	77,634	--	--	--

Table 5 - Business Activity

Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	47,405
Civilian Employed Population 16 years and over	43,829
Unemployment Rate	7.54
Unemployment Rate for Ages 16-24	25.98
Unemployment Rate for Ages 25-65	5.65

Table 6 - Labor Force

Data Source: 2007-2011 ACS

Occupations by Sector	Number of People
Management, business and financial	12,336
Farming, fisheries and forestry occupations	1,949
Service	3,747
Sales and office	12,818
Construction, extraction, maintenance and repair	2,050
Production, transportation and material moving	1,898

Table 7 – Occupations by Sector

Data Source: 2007-2011 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	30,985	75%
30-59 Minutes	8,994	22%
60 or More Minutes	1,110	3%
Total	41,089	100%

Table 8 - Travel Time

Data Source: 2007-2011 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,620	350	800
High school graduate (includes equivalency)	7,374	559	1,502
Some college or Associate's degree	11,314	824	2,127
Bachelor's degree or higher	14,869	774	2,276

Table 9 - Educational Attainment by Employment Status

Data Source: 2007-2011 ACS

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	115	228	271	561	381
9th to 12th grade, no diploma	737	615	414	681	753
High school graduate, GED, or alternative	1,730	2,057	2,033	5,345	4,927
Some college, no degree	2,437	2,391	2,195	5,518	3,308
Associate's degree	383	759	1,039	2,369	674
Bachelor's degree	1,572	3,728	2,820	6,278	3,276
Graduate or professional degree	58	1,049	1,115	2,929	1,628

Table 10 - Educational Attainment by Age

Data Source: 2007-2011 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	20,502
High school graduate (includes equivalency)	30,004
Some college or Associate's degree	37,811
Bachelor's degree	49,027
Graduate or professional degree	71,357

Table 11 – Median Earnings in the Past 12 Months

Data Source: 2007-2011 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors in the city of Bloomington, both by percentage of jobs, as well as percentage of workers are:

- Education & Healthcare Services
- Professional, Scientific, Management Services
- Retail Trade
- Finance, Insurance, and Real Estate
- Arts, Entertainment, Accommodations

Describe the workforce and infrastructure needs of the business community:

Due to the limited funding available through its' CDBG grant, the City of Bloomington has determined that economic development, education, etc., are not a high need for these limited funds.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period.

Describe any needs for workforce development, business support or infrastructure these changes may create.

Due to the limited funding available through its' CDBG grant, the City of Bloomington has determined that economic development, education, etc., are not a high need for these limited funds.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The City of Bloomington is home to the second largest employment base in the Twin Cities metro, offering positions at every skill and education level.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

None.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City of Bloomington has several plans that impact economic growth. First, the City's Comprehensive Plan is the overall plan that guides development within the City. This important plan is revised every 10 years. The City also has several district plans that help to focus economic growth. These plans include the South Loop District Plan, Normandale Lake District Plan and the Penn American District Plan. The plans help to focus and attract development and economic development.

Discussion

The City of Bloomington is located in the second largest employment base in the Twin Cities metro (the 494 Corridor), offering positions at every skill and education level.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

For the purposes of this section "concentration" is defined as census tracts where more than 10% of LMI households experience multiple housing problems. The most common housing problem among low- and moderate-income (LMI) households in Bloomington is cost burden (paying more than 30% of income), which is common to LMI households across the City. A review of the American Community Survey data provided by HUD, 20% or more of LMI households experience cost burden in every census tract in Bloomington. However, problems of overcrowding and substandard housing are not common in Bloomington. There are no census tracts in Bloomington where more than 5% of LMI households experience overcrowding or substandard housing. Thus there are no areas in Bloomington that meet the above definition of concentration of multiple housing problems. Rather the problem of cost-burden is prevalent among LMI households in all areas of the City and is not specific to any particular geographic area.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The City of Bloomington does not have any areas where racial or ethnic minorities or low-income families are concentrated.

The Consolidated Plan regulations require that grantees define the term "area of minority concentration" and then identify and describe those areas in the jurisdiction that meet the definition. For the purposes of this section "area of minority concentration" is defined as a census tract having more than 40% of households which are of racial or ethnic minorities. A review of the American Community Survey data provided by HUD, no census tracts in Bloomington have areas of minority concentration.

The Consolidated Plan regulations also require that grantees define the term "area of low-income concentration" and then identify and describe those areas in the jurisdiction that meet the definition. For the purposes of this section "area of low-income concentration" is defined as a census tract having more than 40% of households which are low-income. A review of the American Community Survey data provided by HUD, Bloomington does not have any areas where low-income families are concentrated.

What are the characteristics of the market in these areas/neighborhoods?

Not applicable - see above. The city does not have areas of concentration.

Are there any community assets in these areas/neighborhoods?

Not applicable - see above. The city does not have areas of concentration.

Are there other strategic opportunities in any of these areas?

Not applicable - see above. The city does not have areas of concentration.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 12 - Geographic Priority Areas

1	Area Name:	City of Bloomington
	Area Type:	City-Wide
	Other Target Area Description:	City-Wide
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

The Bloomington CDBG program activities will be available to low/moderate income persons city-wide and will not be geographically targeted. Bloomington's CDBG activities are provided on a limited clientele basis (available to all qualifying households in the City) rather than on an area-benefit basis (principally benefiting or available to persons within a specific area). Because the housing problems or needs, such as cost-burden are experienced by LMI households across the City and not concentrated in any particular area, Bloomington makes its CDBG activities available to LMI households city-wide.

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

Table 13 – Priority Needs Summary

1	Priority Need Name	Rehabilitation of Existing Units
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	
	Associated Goals	Preserve and Create Single Family Homeownership
	Description	Rehabilitation loans of up to \$35,000 for owner occupied dwelling units. Includes testing for lead-based paint for applicable homes in the rehab program.
	Basis for Relative Priority	
2	Priority Need Name	Public Service
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	
	Associated Goals	Senior Services
	Description	<ul style="list-style-type: none"> • Funding for the H.O.M.E. program for seniors for outside maintenance and chores services. • Fair housing activities coordinated through Hennepin County.
	Basis for Relative Priority	

Narrative (Optional)

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Bloomington intends to pursue all resources available to address its planned 2015 program year activities. The following list provides information on CDBG and other funds used for community development and housing programs within the City.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	415,634	400,000	300,000	1,115,634	4,462,536	The City of Bloomington is an entitlement jurisdiction for the Community Development Block Grant Program.

Table 14 - Anticipated Resources

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

The City of Bloomington intends to pursue all possible resources to address its Consolidated Plan goals. There are no specific matching requirements associated with Bloomington's CDBG program, although any opportunities to provide/obtain matching funding will be pursued.

For example, clients of the Single-Family Rehabilitation Loan Program are occasionally able to provide funds to their CDBG loan through their own resources or obtain other grants, such as for lead-paint abatement.

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

The City of Bloomington's HRA owns 41 single-family rental homes that provide affordable housing to larger families. Twenty of the homes are part of the HRA's Housing Choice Project-Based Voucher program. The other twenty-one homes make up the HRA's Rental Homes for First-Time Home Buyers program. This program assists renters achieve the goal of homeownership through an escrow feature.

Discussion

The City of Bloomington will utilize a variety of federal, state and local funding to achieve the goals identified in this plan. This includes sources used on a recurring basis, including CDBG, Housing Choice Vouchers and HRA levy funds. Additional sources such as LIHTC, TIF and housing revenue bonds have been used on a case by case basis in the past and will continue to be pursued when and where appropriate.

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Bloomington	Government	Non-homeless special needs neighborhood improvements public services	Jurisdiction
Senior Community Services (SCS)	Subrecipient	Non-homeless special needs public services	Jurisdiction

Table 15 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Hennepin County is the lead agency of the Hennepin County Consortium. Hennepin County is recognized as a capable administrator in delivering a housing and community development system that aligns with federal and county priorities with the assistance of our partnering agencies and municipalities. The City of Bloomington is also an experienced administrator of its CDBG programs and has existing partnerships with agencies to deliver a wide range of housing and social services in order to stretch limited funding to meet as many needs as possible.

A significant gap in the institutional delivery system is the need for the additional private and/or non-profit developers of new affordable housing in Bloomington. In order to make the most impact given limited funding and the high cost of new housing construction, Bloomington has historically targeted its CDBG funding to the rehabilitation of homes owned by low/moderate income homeowners. When possible, Bloomington has partnered with private and non-profit housing developers to provide assistance for the construction of new affordable housing through local funding sources such as Tax Increment Financing, Housing Revenue Bonds, and local tax levies. Because available funding sources are not sufficient to cover the entire costs of new construction the City must rely on such partners in the private and non-profit sector. In order to address this gap, the City will work with private and non-profit developers to find new opportunities to partner in the creation of new affordable housing, and will pursue all available local, state, and federal funding sources to provide such assistance when possible.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		
Life Skills	X		
Mental Health Counseling	X		
Transportation	X		
Other			

Table 16 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Hennepin County is the principal provider of these services within the Consortium jurisdictions. The County’s Family Homeless Prevention and Assistance Program (FHPAP) partners with other funding sources to coordinate service delivery and ensure families gain stable housing whether they need short term rental assistance, financial counseling, job counseling, or legal help. Prevention programs connect people with mainstream services and local nonprofit agencies that work in the area where the family lives. In particular, suburban prevention programs funded by ESG and FHPAP work with specific cities and their food shelves to ensure that families can get support in their local communities. Hennepin County social services are dispersed to "service hubs" in the northwest, west, and south suburbs.

The Office to End Homelessness employed a full-time Adult Discharge Planning Coordinator to work directly with Hennepin County Corrections and the Hennepin County Medical Center to improve discharge strategies and outcomes. As a result, and the advent of the Affordable Care Act, Hennepin County has implemented Hennepin Health, which provides health insurance and wrap around social services, including housing, to Medicaid-eligible single adults. Hennepin County participates in hospital to home programming, so that homeless individuals being discharged from a hospital are provided with housing during their recuperation and help locating permanent housing. Heading Home Hennepin has also worked with County Corrections on a Transition from Jail to Community pilot to help people exiting our Adult Correctional Facility find appropriate and affordable housing.

Hennepin County is committed to outreach and engagement and has a robust street outreach program. Outreach is provided at locations where homeless individuals are known to congregate, including parks, overpasses, abandoned structures, and other places not meant for human habitation. Through outreach efforts, professionals are able to develop relationships with individuals, understand their service and housing preferences, create "best practices," and recommend policy changes and resource development priorities.

The bulk of outreach services to the unsheltered homeless populations are provided by: St. Stephen's Street Outreach Program, People Incorporated - Metro Homeless Outreach Program, Hennepin County - PATH/Access, Minnesota AIDS Project and the StreetWorks Collaborative for Youth. Hennepin County has provided funding for the creation of two Opportunity Centers, which serve as one-stop-shop services centers for single adults and youth. Both centers opened in 2010 and each have over twenty agencies co-located on site.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Within the homeless population, special niche populations receive services that are tailored to their specific needs. Veterans are offered veteran-specific housing as well as being eligible for permanent supportive housing if they are chronically homeless.

- Within the Consortium's area, specific programming has been developed for the refugee population, which experiences unique challenges to housing, in part because of their trauma, large family size, lack of English skills, lack of recognized credentials and schooling, and barriers to integrating into American society.
- Chemically-dependent single adults have both sober housing and "wet housing" available, depending on their needs and ability to maintain sobriety.

- While Native Americans are less than one percent of the county's population, they are seven percent of the homeless population and more than one quarter of the unsheltered population. Several Native American focused programs address these specific needs.
- Families homeless grew dramatically during the Great Recession while single adult homelessness grew much more slowly. Funding for family homelessness has responded by redirecting some funds to rapid rehousing services, focusing on repeat shelter users, and expanding capacity to meet this

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The strengths of the delivery system include a diverse and experienced base of housing, community development, and social service providers and organizations. Coordination among the state, the county, and regional and local governments has resulted in significant planning initiatives and working policy groups, such as the Hennepin County and City of Minneapolis Commission to End Homelessness, and the City County Task Force on Lead Hazard Control. One result of this coordination has been the consolidated request for proposal (RFP) issued by public and private funders statewide, including Hennepin County. Annually, the county issues its Coordinated Request for Proposals (CRFP) that includes funding from the county's Affordable Housing Incentive Fund (AHIF), Transit Oriented Development (TOD), Supportive Housing Initiative Fund (SHIF), and Group Residential Housing (GRH), and federal funding from the HOME program and Continuum of Care of the Homeless program. These funding opportunities are further coordinated with federal Community Development Block Grant (CDBG) and Emergency Shelter Grant (ESG) programs. Another example of the effectiveness of the coordination between the Consortium partners is the success of the Consortium in meeting the majority of the Consolidated Plan 2005-2009 goals.

Hennepin County and Minneapolis' 10 year plan to end homelessness, Heading Home Hennepin, has been a collaborative effort driven in large part by the efforts of social service agencies and faith-based organizations who have taken the lead in providing services for the chronically homeless in our community. The City and Hennepin County collaborate to identify the needs and coordinate implementation of the ESG funding through the City-County Office to End Homelessness and Heading Home Hennepin. Over the next five years, Hennepin County will implement a Coordinated Assessment process, bringing together all aspects of the continuum of homeless services into a unified process. Each person seeking homeless services will be assessed within one week for their vulnerability and people will be triaged to the most appropriate level of intervention needed to end their homelessness.

The gaps that do remain in housing delivery result from the shortages of local, state and federal funding, such as rental assistance. Other gaps include remaining fragmentation of certain programs serving special needs populations. Although the consolidated RFP was noted above, a number of other funding sources continue to have separate submission requirements and deadlines. Each funding source also continues to have variations in program complexity and requirements.

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and Create Single Family Homeownership	2015	2019	Affordable Housing	City of Bloomington	Rehabilitation of Existing Units	CDBG: \$551,268	Homeowner Housing Rehabilitated: 150 Household Housing Unit
2	Senior Services	2015	2019	Non-Housing Community Development	City of Bloomington	Public Service	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
3	Fair Housing Activities	2015	2019	Non-Housing Community Development	City of Bloomington		CDBG: \$25,000	Other: 0 Other

Table 17 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve and Create Single Family Homeownership
	Goal Description	In order to preserve and maintain Bloomington supply and quality single-family homes, the City will make deferred payment loans of up to \$35,000 for low/moderate income homeowners to rehabilitate their single-family homes. This program is offered Citywide and will help approximately 30 low/moderate families maintain their homes each year of the plan. This program helps maintain the overall housing stock within the City of Bloomington. This is the only activity that produces program income and the proceeds are reinvested into the rehabilitation loan program according to the activity's budget and acts as a revolving loan fund.

2	Goal Name	Senior Services
	Goal Description	In order to assist seniors living in Bloomington, the City's CDBG will fund the Home Maintenance Program (H.O.M.E.), a program of Senior Community Service. This service provides for household and outside maintenance chore services for elderly and persons with disabilities who are presumed to be low and moderate income. This program is offered citywide and will benefit approximately 100 households during each year of the plan. This program's accomplishment is to allow seniors and disabled persons to remain in their homes.
3	Goal Name	Fair Housing Activities
	Goal Description	This activity is to further fair housing initiatives as part of the Hennepin County Consortium. Activities may include enforcement, training, education and outreach.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The HOME Investment Partnerships Program (HOME) provides grants to states and localities that communities use to fund buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct assistance to low-income people. Bloomington is not HOME recipient. Rather, HOME funds are allocated to and coordinated by Hennepin County for affordable projects county-wide, excluding the City of Minneapolis.

Bloomington's CDBG housing programs are generally oriented towards the rehabilitation of the city's existing owner-occupied housing stock. During the 2015-2019 Consolidated Plan cycle, Bloomington expects to assist approximately 150 low- and moderate-income families through the program each year. The City estimates that of the 150 families to be assisted in PY2015, 15 will be extremely low-income, 60 will be low-income and 75 will be moderate-income.

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

All participants in Bloomington's CDBG housing programs receive an EPA pamphlet "How to Protect Your Family from Lead in the Home". Recipients of CDBG assistance through Bloomington's Housing Rehabilitation Loan are required to conduct a lead risk assessment if the home was built before 1978. In all cases, the home must receive lead clearance. If lead hazards are identified in a Housing Rehab loan project, they must either be fully abated or reduced with interim controls and/or safe work practices, depending on the amount of rehab funding being provided. Additionally, the City, using CDBG funds, will pay for initial and clearance testing for lead hazards. Rehab loan clients an additional \$10,000 in loan funding in order to help cover the costs of any required lead hazard reduction work. This funding for testing is also made available to owners of rental units and are renting to a Housing Choice Voucher program participant.

How are the actions listed above integrated into housing policies and procedures?

Requirements for lead hazard testing, lead hazard reduction, and clearance are fully integrated into Bloomington's CDBG housing programs. Applicants to the Housing Rehab Loan program are provided with an EPA lead pamphlet. Clients approved to participate in the Housing Rehab loan programs are informed of all relevant testing and hazard reduction requirements associated with the program they are using. The written program guidelines (which are provided to participants) specify the policies and procedures regarding testing, hazard reduction, and clearance. Lastly, HRA staff gather documentation for all projects to record that the procedural guidelines were followed.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City of Bloomington actively works with the goal to reduce the number of poverty-level families through policies and programs aimed to assist those families. The City coordinates its services to poverty-level families through its programs offered by its Public Health Division (i.e.: WIC, public health nurses, etc.), it's HRA (i.e.: affordable housing, including Section 8 Vouchers) and it's Human Services Division (i.e.: low-income elderly services, free evening meals). The City also coordinates efforts with the local school district and offers reduced participation fees for its activities offered though its Park and Recreation Division.

As a member of the Hennepin County Consortium, the City of Bloomington adopts the goals and policies of the Hennepin County anti-poverty strategy. As the City of Bloomington resides in Hennepin County, residents are able to receive assistance through anti-poverty programs coordinated at the County level. Hennepin County assists individuals and families access resources that help them move into self-sufficiency. Hennepin County Human Services delivers a variety of services to individuals or families that assists with basic needs or encourages client change around specific objectives. Efforts include:

- social programs (safety net services such as food support, emergency shelter and cash assistance);
- help for people who are developmentally disabled;
- services for seniors;
- services for veterans;
- behavioral and chemical health services;
- protective services for children and adults;
- child support; and
- health care through Medical Assistance.

Hennepin County workforce development efforts help alleviate poverty by improving family and individual economic opportunities that lead to a sustainable living wage. The county works with private and non-profit sectors to train and match employees; and partners with colleges, universities and training programs to develop a strong future workforce. Initiatives include:

- Workforce Activities Alignment - Creation of workforce coordinator position
- Workforce Entry Program (WEP) - Meeting the demand for skilled trade persons while developing the county's economic resources by providing unemployed individuals the means to earn a better living.
- A-GRAD Initiative - Improving high school graduation rates
- Workforce Investment Network - Partnerships to create workforce opportunities for targeted communities and reducing economic disparities
- Step-Up Program - High school internships at the county

- Employment Pays Program - Employment supports for individuals with high behavioral health needs
- NorthPoint/Urban League - Training and employment partnership

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

Anti-poverty programs in suburban Hennepin County (including the City of Bloomington) are coordinated by Hennepin County. In addition, the City, through its Housing and Redevelopment Authority (HRA) works to provide affordable housing opportunities to poverty-level families. Affordable housing is a high community priority.

The HRA operates a Housing Choice Voucher program of 551 units and it is the primary method to house poverty-level families within Bloomington. The HRA also works to attract new affordable housing development to the City. The most recent effort was assisting the development of 50 new Low-Income Housing Tax-Credit (LIHTC) units in 2008. The City provided CDBG funds to reduce land costs for the project. The HRA is actively looking to find another opportunity to serve poverty-level families through the development of affordable housing. However, being a fully developed City, locating land to be developed (or redeveloped) is extremely challenging. To that end, the City and HRA are looking for new ways to serve poverty-level families. The HRA, in 2015, will project-base eight vouchers in a new construction, market-rate rental development of 394 units. This strategy will allow poverty-level families to reside in market-rate development that would otherwise be beyond their means. A second phase of this project (2017), for an additional 400 units, will also be an opportunity for the HRA to place poverty-level families in a market rate rental development. The HRA is also actively looking to partner with a non-profit land trust in 2016 to provide affordable home-ownership opportunities to low-income families. The City may dedicate some of its PY2016 CDBG funds to this effort.

SP-80 Monitoring - 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Bloomington will execute an annual contract with any sub-recipient receiving funds through the Action Plan. The City will be the responsible entity to ensure contract administration and compliance for activities funded out of Bloomington CDBG funds. Staff has extensive experience in monitoring such activities. The City staff will ensure compliance of sub-recipients through annual on-site monitoring for compliance with program regulations, procedures and meeting goals and objectives of the program and Action Plan. Such monitoring will include random file reviews, review of financial documentation and annual performance reports. In addition to the monitoring of sub-recipients, the City has developed extensive internal control procedures to ensure the funds are utilized in compliance with program guidelines and prudent financial practices.

Expected Resources

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

Introduction

The City of Bloomington intends to pursue all resources available to address its planned 2015 program year activities. The following list provides information on CDBG and other funds used for community development and housing programs within the City.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	415,634	400,000	300,000	1,115,634	4,462,536	The City of Bloomington is an entitlement jurisdiction for the Community Development Block Grant Program.

Table 18 - Expected Resources – Priority Table

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

The City of Bloomington intends to pursue all possible resources to address its Consolidated Plan goals. There are no specific matching requirements associated with Bloomington's CDBG program, although any opportunities to provide/obtain matching funding will be pursued. For example, clients of the Single-Family Rehabilitation Loan Program are occasionally able to provide funds to their CDBG loan through their own resources or obtain other grants, such as for lead-paint abatement.

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

The City of Bloomington's HRA owns 41 single-family rental homes that provide affordable housing to larger families. Twenty of the homes are part of the HRA's Housing Choice Project-Based Voucher program. The other twenty-one homes make up the HRA's Rental Homes for First-Time Home Buyers program. This program assists renters achieve the goal of homeownership through an escrow feature.

Discussion

The City of Bloomington will utilize a variety of federal, state and local funding to achieve the goals identified in this plan. This includes sources used on a recurring basis, including CDBG, Housing Choice Vouchers and HRA levy funds. Additional sources such as LIHTC, TIF and housing revenue bonds have been used on a case by case basis in the past and will continue to be pursued when and where appropriate.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and Create Single Family Homeownership	2015	2019	Affordable Housing			CDBG: \$275,634	Homeowner Housing Rehabilitated: 30 Household Housing Unit
2	Senior Services	2015	2019	Non-Housing Community Development			CDBG: \$20,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
3	Fair Housing Activities	2015	2019	Non-Housing Community Development		Public Service	CDBG: \$5,000	Other: 0 Other

Table 19 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve and Create Single Family Homeownership
	Goal Description	In order to preserve and maintain Bloomington supply and quality single-family homes, the City will make deferred payment loans of up to \$35,000 for low/moderate income homeowners to rehabilitate their single-family homes. This program is offered Citywide and will help approximately 30 low/moderate families maintain their homes per year. This program helps maintain the overall housing stock within the City of Bloomington. This is the only activity that produces program income and the proceeds are reinvested into the rehabilitation loan program according to the activity's budget and acts as a revolving loan fund.
2	Goal Name	Senior Services
	Goal Description	In order to assist seniors living in Bloomington, the City's CDBG will fund the Home Maintenance Program (H.O.M.E.), a program of Senior Community Service. This service provides for household and outside maintenance chore services for elderly and persons with disabilities who are presumed to be low and moderate income. This program is offered citywide and will benefit approximately 100 households during each year of the plan. This program's accomplishment is to allow seniors and disabled persons to remain in their homes.
3	Goal Name	Fair Housing Activities
	Goal Description	This administrative activity is to further fair housing initiatives as part of the Hennepin County Consortium. Activities may include enforcement, training, education and outreach.

AP-35 Projects - 91.420, 91.220(d)

Introduction

Activities that will be undertaken during 2015 will address priority needs and local objectives. The activities that are part of the 2015 Action Plan are to be completed within the program year. Of the total grant of \$419,321 the City will use \$320,634 or 77% to serve low and moderate income activities. The balance of funds is used for Fair Housing activities and administration expenses.

#	Project Name
1	Administration
2	Single-Family Rehabilitation Loans
3	Lead-Based Paint
4	Fair Housing
5	H.O.M.E.

Table 20 – Project Information

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

The City of Bloomington will utilize Community Development Block Grant (CDBG) funds to achieve a number of goals that best serve the citizens of Bloomington. The City will use its entitlement funds to achieve the goals/outcomes as noted in the following the plan. The City has prioritized its activities on the needs of the community, given the very limited funding available from the CDBG program.

AP-38 Project Summary

Project Summary Information

1	Project Name	Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$90,000
	Description	General program administrative expenses.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	Single-Family Rehabilitation Loans
	Target Area	
	Goals Supported	Preserve and Create Single Family Homeownership
	Needs Addressed	Rehabilitation of Existing Units
	Funding	CDBG: \$275,634
	Description	Revolving rehab loan program to low/mod income homeowners.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	This is a Revolving Loan Fund. Deferred payment loans of up to \$35,000 for low/moderate income homeowners to rehabilitate single-family homes. This program is offered Citywide and could help approximately 30 low/moderate families maintain their homes. This program helps maintain the overall housing stock within the City of Bloomington. This is the only activity that produces program income and the proceeds are reinvested into the rehabilitation loan program according to the above budget.
3	Project Name	Lead-Based Paint
	Target Area	
	Goals Supported	Preserve and Create Single Family Homeownership
	Needs Addressed	Rehabilitation of Existing Units
	Funding	CDBG: \$25,000
	Description	Funding for lead-based paint and clearance testing for rehab loan program participants and owners of rental units participating in the Section 8 Voucher Program.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Lead based paint initial and clearance testing.
4	Project Name	Fair Housing
	Target Area	

	Goals Supported	Fair Housing Activities
	Needs Addressed	Public Service
	Funding	CDBG: \$5,000
	Description	Further fair housing initiatives as part of the Hennepin County Consortium.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	This administrative activity is to further fair housing initiatives as part of the Hennepin County Consortium. Activities may include enforcement, training, education and outreach.
5	Project Name	H.O.M.E.
	Target Area	
	Goals Supported	Senior Services
	Needs Addressed	Public Service
	Funding	CDBG: \$20,000
	Description	Home and Outside Maintenance for Elderly (H.O.M.E.) program is a service of Senior Community Services (SCS) which provides for household and outside maintenance for low/mod income elderly and disabled persons.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	The Home Maintenance Program (H.O.M.E.), a program of Senior Community Services, provides for household and outside maintenance chore services for elderly and persons with disabilities who are low and moderate income. This program is offered citywide and will benefit approximately 100 households during the year. This program's accomplishment is to allow seniors and disabled persons to remain in their homes.
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AP-50 Geographic Distribution - 91.420, 91.220(f)

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

The Bloomington CDBG program activities will be available to low/moderate income persons city-wide and will not be geographically targeted. Bloomington's CDBG activities are provided on a limited clientele basis (available to all qualifying households in the City) rather than on an area-benefit basis (principally benefiting or available to persons within a specific area). Because the housing problems or needs, such as cost-burden are experienced by LMI households across the City and not concentrated in any particular area, Bloomington makes its CDBG activities available to LMI households city-wide.

Geographic Distribution

Target Area	Percentage of Funds
City of Bloomington	

Table 21 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Not applicable - see above.

Discussion

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

Introduction

Despite limited funding, Bloomington's CDBG program is designed to meet a wide range of needs, including services for seniors, fair housing activities, housing rehabilitation and reducing lead-based paint hazards. The City works with a variety of public, non-profit, and private industry partners to accomplish its community development goals, both through the CDBG program and through other resources.

Actions planned to address obstacles to meeting underserved needs

The City will continue to identify obstacles, such as lack of affordable housing, to unmet and underserved community needs and support the goals established in the 2015-2019 Consolidated Plan. The City's approach to meeting these affordable housing needs is to provide affordable housing opportunities includes the City's HRA and the Housing Choice Voucher program. In addition, to preserve and expand the supply of decent, safe, and affordable housing, the City will provide financial assistance for rehabilitation and repair of owner-occupied units of low to moderate income families. Other activities that would meet unmet needs not addressed by our limited CDBG funding will be identified and other resources may be sought to meet the need.

The City has chosen activities that best serve the needs of the Citizens of Bloomington, given limited funding of the CDBG Program. Over the past several funding cycles, the City's total grant has been reduced by nearly \$160,000 from its high point of \$522,000 in FY2003. This reduction has created obstacles to expanding existing activities or funding new activities to meet underserved needs.

Creating additional affordable housing is inhibited by the lack of vacant land. All housing development will occur as redevelopment, driving the land acquisitions costs to an extremely high level. Although the real estate market has tempered somewhat over the last few years, land acquisition costs in Bloomington remain high. Additional decline in dollars from other funders also inhibits the amount of affordable housing which can be either preserved or created.

Actions planned to foster and maintain affordable housing

The biggest affordable housing activity that the Bloomington HRA manages is our 551 unit Housing Choice Voucher program. This important community resources assists 551 families every month. These families include elderly, disabled and single-parent households.

In addition, the Bloomington HRA owns 20 single-family homes in our Assisted Rental Housing Program. The units maintain their affordability through the HRA's action to project-base 20 vouchers from its tenant-based Section 8 program in these units. Originally, the units were part of the HRA's Public Housing program, which ended in 2012. The HRA's Public Housing program was developed in 1995;

however the program failed to be self-supporting. The HRA had to provide additional funding over several years to cover shortfalls in the Public Housing program. This use of local levy funds to support this federal program was necessary as a result of several years of reduced funding by HUD. The HRA received approval from HUD to terminate its Public Housing program and transfer the units to the Section 8 Housing Choice Voucher program.

In addition, the City of Bloomington's HRA currently has 21 single-family homes in its Rental Home for First-Time Home Buyers program. This program was originally funded by Hennepin County HOME funds. This program serves families that are making the transition from renting to owning their own home. The program escrows a portion of their monthly rent for future use as a down payment on the purchase of a home.

The Bloomington HRA is responsible for maintenance and management of all 41 of the above single-family affordable rental units.

The HRA used FY 2007 funding for the land acquisition-substantial rehabilitation activity to assist in funding the land acquisition for the development of 50 new units of affordable tax-credit rentals. The HRA worked with Sherman and Associates to acquire the land for the units with the CDBG funds at 8735 Portland Avenue South. The amount of CDBG expended was \$257,000. In addition, the HRA contributed \$343,000 of its own funds to the project, for a total of \$600,000. The affordability of these tax-credit apartments will provide additional needed workforce housing in the City. The project completed lease up in the fall of 2009. Due to reduced CDBG grants, the City has not been able to fund this activity in recent years.

Actions planned to reduce lead-based paint hazards

The City will continue to comply with all requirements of Title X-Residential Paint Hazard Reduction Act of 1992. Additionally, the Bloomington HRA is using a portion of the CDBG funds for lead abatement activities in its Section 8 Rent Assistance Program and CDBG Single Family Rehabilitation Loan Program. The Bloomington HRA also informs all tenants participating in the Section 8 Program, public housing and rental home program of potential hazards of lead paint.

All recipients of rehabilitation funds must have a lead paint inspection performed on their home prior to receiving a loan. Any lead that is found must then be abated using CDBG funds. The Bloomington Public Health Department also makes referrals for testing when cases of lead poisoning are suspected.

The Bloomington HRA also keeps Section 8 landlords up to date regarding lead paint through its quarterly Rental Collaborative meetings.

The Bloomington HRA has two staff people who are trained lead inspectors and risk assessors. The Bloomington HRA provides CDBG funding to owners of rental property with Section 8 households with

children below the age of six where the units will have to be tested for lead. Also, all of their Single Family rehabilitation activities (approximately 35 units) through the CDBG Program will have to be assessed and abated of lead paint.

Collaborative efforts: The City of Bloomington's Public Health Division advises the staff of the HRA of any known persons with lead poisoning who may be seeking services from the HRA/CDBG funded activities. In addition, the City partners with Hennepin County to provide lead paint abatement services for single-family rehabilitation clients whose family composition qualifies.

Actions planned to reduce the number of poverty-level families

The HRA provides affordable housing to poverty-level families through its Housing and Redevelopment Authority. This stable housing offers families and individuals the structure necessary to work on their income issues, such as education, new jobs and other important factors to overcome poverty.

Actions planned to develop institutional structure

The City of Bloomington has and will continue to coordinate with other institutions in the delivery of housing and community development programs. For example, in the past, the City has partnered with the National Handicapped Housing Institute, Sherman & Associates and Sand Companies for the development of new affordable and/or accessible housing.

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

The city of Bloomington has its own Housing and Redevelopment Authority. The HRA manages the CDBG program for the City and the two entities work closely together to achieve shared goals. In addition the HRA manages 551 units of affordable housing through its Housing Choice Voucher program. This important community resources assists 551 families every month. These families include elderly, disabled and single-parent households.

In addition, the Bloomington HRA owns 20 single-family homes in our Assisted Rental Housing Program. The units maintain their affordability through the HRA's action to project-base 20 vouchers from its tenant-based Section 8 program in these units. Originally, the units were part of the HRA's Public Housing program, which ended in 2012. The HRA's Public Housing program was developed in 1995; however the program failed to be self-supporting. The HRA had to provide additional funding over several years to cover shortfalls in the Public Housing program. This use of local levy funds to support this federal program was necessary as a result of several years of reduced funding by HUD. The HRA received approval from HUD to terminate its Public Housing program and transfer the units to the Section 8 Housing Choice Voucher program.

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The Bloomington HRA is responsible for maintenance and management of all 41 of the above single-family affordable rental units.

The HRA coordinates social service efforts with the City's Human Services and Public Health divisions. Human Services is the primary City division that delivers or coordinates services with outside entities for seniors, low income families, disabled individuals and others in the community. Public Health provides WIC and other essential services to the community.

Discussion

Program Specific Requirements

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

Introduction

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

Discussion

Attachments

Grantee SF-424's and Certification(s)

OMB Number: 4510-0004
Expiration Date: 8/31/2015

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		* If Revision, select appropriate letter(s) <input type="text"/> * Other (Specify): <input type="text"/>	
* 3. Date Received:		4. Applicant Identifier:	
<input type="text"/>		<input type="text"/>	
5a. Federal Entity Identifier:		5b. Federal Award Identifier:	
<input type="text"/>		<input type="text"/>	
State Use Only:			
6. Date Received by State:		7. State Application Identifier:	
<input type="text"/>		<input type="text"/>	
8. APPLICANT INFORMATION:			
* a. Legal Name: <input type="text" value="City of Bloomington"/>			
* b. Employer/Taxpayer Identification Number (EIN/TIN):		* c. Organizational DUNS:	
<input type="text" value="61-6504990"/>		<input type="text" value="0716879280000"/>	
d. Address:			
* Street1:	<input type="text" value="1600 West Old Shakopee Road"/>		
Street2:	<input type="text"/>		
* City:	<input type="text" value="Bloomington"/>		
County/Parish:	<input type="text"/>		
* State:	<input type="text" value="MN: Minnesota"/>		
Province:	<input type="text"/>		
* Country:	<input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code:	<input type="text" value="55431-3027"/>		
e. Organizational Unit:			
Department Name:		Division Name:	
<input type="text"/>		<input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	<input type="text"/>	* First Name:	<input type="text" value="Bryan"/>
Middle Name:	<input type="text"/>		
* Last Name:	<input type="text" value="Hartman"/>		
Suffix:	<input type="text"/>		
Title:	<input type="text" value="Program Manager"/>		
Organizational Affiliation:			
<input type="text"/>			
* Telephone Number:	<input type="text" value="952-502-8343"/>	Fax Number:	<input type="text" value="952-554-4977"/>
* Email:	<input type="text" value="bhartman@cityofbloomington.gov"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City of Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (Specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="HUD"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14-218"/>	
CFDA Title: <input type="text" value="Community Development Block Grants/Entitlement Grants (CDBG)"/>	
* 12. Funding Opportunity Number: <input type="text" value="R-15-MR-27-COGL"/>	
* Title: <input type="text" value="2015 Community Development Block Grants/Entitlement Grants (CDBG)"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Single-family rehabilitation loans, fair housing activities, lead-based paint testing, household services for elderly, administrations"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:
 * a. Applicant: [] * b. Program/Project: [3]

Attach an additional list of Program/Project Congressional Districts if needed:
 [] Add Attachment [] Delete Attachment [] View Attachments

17. Proposed Project:
 * a. Start Date: [07/01/2015] * c. End Date: [06/30/2016]

* 8. Estimated Funding (\$):

* a. Federal	415,634.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	415,634.00

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?
 a. This application was made available to the State under the Executive Order 12372 Process for review on []
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.
 c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
 Yes No
 If "Yes", provide explanation and attach:
 [] [] []

21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)
 I AGREE
 ** The list of certifications and assurances or an internet site where you may obtain the list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: [] * First Name: [] * Last Name: []
 Middle Name: []
 * Last Name: [William / Wendt] Suffix: []
 * Title: Mayor / City Manager
 * Telephone Number: [52-533-8754] * Fax Number: []
 * Email: [w.wendt@cityofbloomington.gov]
 * Signature of Authorized Representative: [Signature] * Date Signed: [6/24/2015]

Reviewed and approved by the City Attorney Amy K. Adkins, Acting Date 6/19/15

CERTIFICATIONS

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

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

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

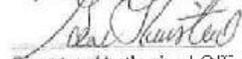
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

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

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

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

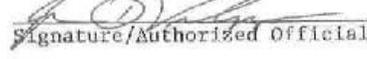
Section 3: It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



Signature/Authorized Official
Mayor

5/4/15

Date



Signature/Authorized Official
City Manager

5/4/15

Date

Reviewed and approved by the City Attorney



City Attorney

Specific CDBG Certifications

The Entitlement Community certifies that:

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

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

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

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

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) ~~2015~~, ~~2016~~ (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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

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

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

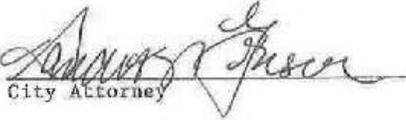

Signature/Authorized Official 5/4/15
Date

Mayor
Title


Signature/Authorized Official 5/4/15
Date

City Manager
Title

Reviewed and approved by the City Attorney


City Attorney

Appendix - Alternate/Local Data Sources