

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Pursuant to the Housing and Community Development Act of 1974, the City of Moorhead is designated as an entitlement community and therefore receives an annual allocation of Community Development Block Grant (CDBG) funds from the US Department of Housing and Urban Development (HUD). CDBG funds are used to develop viable urban communities by providing decent housing, suitable living environments, and economic opportunities, primarily to low- and moderate-income persons.

The 2024 Annual Action Plan was developed using citizen participation, current statistics, and alignment of activities with goals and objectives outlined in the corresponding, approved 5-Year Plan. This Action Plan is a result of all planning efforts.

2. Summarize the objectives and outcomes identified in the Plan

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

According to 2020 Decennial Census, Moorhead has a population of 44,505 people and is included in the Fargo-Moorhead Metropolitan Statistical Area (MSA), which has an overall population of 249,843 people. The City has prepared this plan in collaboration with local service providers, area agencies, and citizens who share a common goal to address Moorhead's community development needs in a way that utilizes resources efficiently and thoughtfully.

See AP-20 which contains a table of the City's goals and objectives. For 2024, Moorhead plans to address affordable housing needs through homeowner housing rehabilitation, acquisition for affordable housing, supporting the efforts of governmental and private agencies through the provision of technical assistance, and the rehabilitation of an affordable rental housing development. Other objectives include addressing homeless needs through supporting the continuation of emergency, transitional, and permanent supportive housing and supporting the initiatives of these service providers to expand homeless prevention services including outreach, coordinated assessment, shelter services, transportation, and transitional housing through technical support, certificates of consistency for funding applications, transportation vouchers and other means. The City will address its objective of

meeting non-homeless special needs services through supporting initiatives of service providers to maintain and expand services, outreach, and assessment for special needs populations through technical support, certificates of consistency for funding applications and other means. The City will work to meet non-housing community development needs of low-income youth by providing positive recreational and developmental opportunities in local parks. 2024 projected outcomes include 6 home rehabilitation loans, 1-2 accessibility improvements to homes, discounted bus passes for 150 extremely low-income persons, recreational activity program for 65 youths.

3. Evaluation of past performance

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

The year 2023 was the fourth year of a five-year Consolidated Plan cycle for housing and community development. The City of Moorhead's 2023 CDBG expenditures were consistent with its Consolidated Plan and one-year action plan. The City prioritized its available Community Development Block Grant (CDBG) resources on activities to maintain and create affordable housing opportunity within the community as follows:

Single Family Home Rehabilitation Loan Program: this program addressed affordable housing preservation by completing safety, energy, and structural improvements to six housing units occupied by low-moderate income households.

Homelessness Objectives: To reach out to low-income people many of whom are primarily homeless, CDBG funds were utilized for the Opportunities Under Transit (OUT) program which provides discounted bus passes for extremely low-income persons. This program is available to all individuals who are earning at 30% of the AMI with the majority of those who access the program are referred by one of our area homeless shelters. This program provides those who income qualify the opportunity to access transportation in the Moorhead area.

Other Non-housing Community Development: The City continued an important CDBG program in 2023, recreational opportunities for low-to-moderate income youth. In 2023, 25 kids participated in after school programming provided by Moorhead Park and Recreational Department, and 27 kids participated in the Youth Program with the Afro-American Development Center. The Moorhead Park program provides afterschool activities, assistance with homework and a healthy snack.

Non-homeless Special Needs Services: The City continued an important CDBG program in 2023 which provided snow removal service to homeowners who were senior and/or disabled. This important program provided these income qualifying homeowners to ability to safely access their homes.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

For the 2024 Annual Action Plan, a community public meeting was held to gain knowledge from the public on items of interest to be included in the 2024 Action Plan. This public meeting was held September 15, 2023. There was one individual from the community that attended the input meeting, and no comments were received.

A public hearing (12/11/2023), service provider and agency outreach for updates, and a 30-day comment period (11/23/2023 – 12/23/2023).

A majority of in-depth citizen participation and consultation occurred during the development of the 5-Year Plan (2020-2024). Citizens were engaged in the planning by means of a community survey that was prepared and administered by the City. The purpose of the survey was to have citizens identify the most important housing and non-housing community development needs in Moorhead and gain insight into fair housing. See Appendices for survey. The survey results were compared alongside notes taken during conversations with local service providers/agencies (consultations) and statistical data provided by agencies or the US Census Bureau. The survey was ultimately used to illustrate correlations among citizens, service providers, agencies, and available data. 335 people participated in the development of the 5-Year Plan.

The City worked to broaden public participation by holding a public meeting, a public hearing and encouraging participation in a 30-day comment period. The City advertised the public meeting, hearing and comment period in the official newspaper of the City. The City also sent out an electronic notification to registered subscribers in an effort to engage them in development of the plan. In order to accommodate disabled persons and non-English speakers, all advertisements included this language, “In advance of the public hearing, alternative formats of this information or accommodation for persons with disabilities or limited English proficiency will be made upon request (10-hour notice is required). To make arrangements for services, call 218-299-5434; for TDD/Relay service dial 711.” No services were requested. The proposed action plan was made available on the City’s website and at the public library and Moorhead Public Housing Agency. City staff also worked with local service agencies that service low-to-moderate income clientele in order to solicit input during the planning process.

5. Summary of public comments

There were no public comments that were received during the public comment period for the 2024 Annual Action Plan. A majority of in-depth citizen participation and consultation occurred during the development of the 5-Year Plan (2020-2024). Citizens were engaged in the planning by means of a community survey that was prepared and administered by the City. The purpose of the survey was to have citizens identify the most important housing and non-housing community development needs in Moorhead and gain insight into fair housing. See Appendices for survey. The survey results were

compared alongside notes taken during conversations with local service providers/agencies (consultations) and statistical data provided by agencies or the US Census Bureau. The survey was ultimately used to illustrate correlations among citizens, service providers, agencies, and available data. 335 people participated in the development of the 5-Year Plan.

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

All comments are accepted and considered in the development of the 2024 Action Plan.

7. Summary

The Executive Summary includes a brief introduction along with a summary of the objectives and outcomes identified in the need's assessment. Areas of need that were summarized related to housing, homelessness, non-homeless special needs, and non-housing community development needs. Brief sections on the evaluation of past performance and the citizen participation/consultation process were also included.

DRAFT

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

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

Describe the agency/entity 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 | MOORHEAD | City of Moorhead |

Table 1 – Responsible Agencies

Narrative (optional)

The City of Moorhead is the Lead & Responsible Agency for the administration of the Community Development Block Grant (CDBG). The program is managed by the Governmental Affairs Department and the main contact is the Community Development Program Administrator.

Consolidated Plan Public Contact Information

Tanya Kunza

Community Development Program Administrator

500 Center Ave/PO Box 779

Moorhead, MN 56561

218.299.5375

tanya.kunza@moorheadmn.gov

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

For the 2024 Annual Action Plan, the citizen participation process included a community public meeting (09/15/2023), a public hearing (12/11/2023), service provider and agency outreach for updates, and a 30-day comment period (11/23/2023 – 12/23/2023).

A majority of in-depth citizen participation and consultation occurred during the development of the 5-Year Plan (2020-2024). Citizens were engaged in the planning by means of a community survey that was prepared and administered by the City. The purpose of the survey was to have citizens identify the most important housing and non-housing community development needs in Moorhead and gain insight into fair housing. See Appendices for survey. The survey results were compared alongside notes taken during conversations with local service providers/agencies (consultations) and statistical data provided by agencies or the US Census Bureau. The survey was ultimately used to illustrate correlations among citizens, service providers, agencies, and available data. 335 people participated in the development of the 5-Year Plan.

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))

In addition to required consultations with health and housing agencies in preparation of the Consolidated Plan, Moorhead City staff also has regular interaction with the following agencies: Moorhead Public Housing Agency (MPHA), Clay County Housing & Redevelopment Authority (CCHRA), Lakes and Prairies Community Action Partnership which manages a Family Homeless Prevention & Housing Assistance Program (FHPAP) and homebuyer education, Lake Agassiz Habitat for Humanity, Successful Outcomes for Tenants and Landlords (SOFTL), Fargo Moorhead Coalition to End Homelessness, West Central Minnesota Continuum of Care (CoC), and Creative Care for Reaching Independence (CCRI) (which help the special needs population to live and work independently), Churches United homeless shelters, MATBUS, and Legal Services of Northwest Minnesota (eviction mitigation).

All of the 24 local agencies that participated in the development of the 5-Year Plan are easily accessible and understand that the relationship with the City is reciprocal. Outreach during the citizen participation process energized relationships, providing opportunity for enhanced coordination between health and housing agencies and the City of Moorhead. The interconnectedness among local agencies is

also strong; they rely on each other for services and regularly collaborate to meet the needs of their clients. A coordinated assessment system further connects providers and clients to services and information.

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.

The City of Moorhead meets quarterly with the Coordinator of the West Central Minnesota Continuum of Care. The City is appreciated for ongoing support of homelessness projects, specifically with recent capital improvements at the Churches United Micah's Mission homeless shelter, food support and emergency housing assistance, all funded by CDBG-CV.

The City met with the West Central Minnesota Continuum of Care (CoC) lead contact to discuss needs and opportunities within the community. The City also worked with the CoC on sections of the Consolidated Plan to address needs related to homelessness. The City, in 2018 used CDBG funding to install a bus shelter in close proximity to Bright Sky Apartments which is a 43-unit permanent supportive housing development operated by Churches United for the Homeless. The CoC noted the network of non-profit service providers as one of Moorhead's greatest strengths/assets. Some of Moorhead's weaknesses noted by the CoC and other area agencies, with particular consideration of homeless persons or persons at risk of homelessness, were related to the lack of affordable housing opportunity, lack of case management resources, and public transportation gaps.

The City consulted and coordinated with public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families, homeless individuals and families, including veterans, youth and persons with special needs. West Central CoC and Lakes & Prairies Community Action Partnership work very closely with those populations. The City actively works to support those organizations and subsequently to address the needs of those populations. The City has funded programs operated by those organizations. City staff actively participates in the CoC and attends quarterly meetings.

Public Transit. The Metro Area Transit (MATBUS) system has added routes, increased frequency, and extended hours on evening routes to accommodate rider needs. Ongoing marketing efforts (i.e., television, radio, billboard, newspapers, and website), are made to increase awareness of the service. MATBUS added two new Moorhead/Dilworth routes in 2014. One route increased access to southeast Moorhead where development efforts are ongoing. This new route opened up more employment opportunities, particularly for people who rely on public transit. Public transportation via MATBUS was provided at no cost during a significant portion of the pandemic.

Public Utilities Moorhead Public Service (MPS) rates are comparable to other regional providers because they do not add various adjustments to their bills called rate riders. MPS does not add fuel

adjustments, environmental costs, or conservation fees. There are energy assistance programs in the community through West Central Communities Action, Inc., Clay County Social Services, and Salvation Army to help with utility costs.

Police Transports. Due to jurisdictional restrictions, the Moorhead Police Department cannot transport a person across state lines who is being held on a peace officers 72-hour detox hold, which is a state statute that give police the authority under law to detain against a persons will for their own wellbeing. This authority is not legal in another state.

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

The City of Moorhead meets quarterly with the Coordinator of the West Central Minnesota Continuum of Care and also attends CoC Homeless to housed task force and meets on a regular basis with the FM Homeless

Coalition. The West Central Minnesota CoC has written standards for provision of ESG funds. The West Central CoC will continue to refine its written standards as the region adapts and further develops our regional CARES (Coordinated Assessment, Referral and Evaluation System) network and develops improved strategies for targeting resources. CARES is a system of assessing homeless client needs and tracking data among service providers. The community has transitioned into this system over the last 6 years. CARES is designed to reduce the amount of time a person is homeless or prevent homelessness by connecting clients to services faster. In the past, multiple needs assessments were conducted by multiple service providers, increasing client confusion and the amount of time a person waited to access services. CARES allow for a single needs assessment and a database; once the information is inputted into the system, all service providers can access the information and run reports. Needs are assessed using a Service Prioritization Decision Assistance Tool (SPDAT or VI-SPDAT). Area agencies are currently using the VI-SPDAT tool, which was designed for use in outreach assessment with homeless individuals; it combines the medical risk factors of the Vulnerability Index (VI) with the social risk factors of the SPDAT. Once clients are assessed, the end result produces a number used to rank needs by priority.

Instead of the traditional first come-first serve concept, those who need help the most are the first to be connected to services. This tool has improved the service delivery system and further connects agencies. The City of Moorhead and the City of Fargo provided CDBG funding for the development of CARES.

The West Central Minnesota CoC focuses on chronic homeless, families with children, unaccompanied youth, and persons coming from the streets or emergency shelter. Chronic homeless persons and families are given priority in coordinated assessment, open shelter beds, and permanent supportive

housing lists according to the CoC Coordinator. Families with children or unaccompanied youth are given priority in rapid-rehousing and transitional housing programs. The CoC may utilize funds for the following target areas: prevention, emergency shelter, motel voucher, domestic violence shelter, permanent housing, and transitional housing that includes programming related to financial literacy, rental assistance, case management, advocacy, and housing education. The City of Moorhead attends the discussions of the ESG programs and hears the evaluation of them and their outcomes. The CoC conducts quarterly program reviews.

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

Table 2 – Agencies, groups, organizations who participated.

| | | |
|---|--|---|
| 1 | Agency/Group/Organization | Moorhead Public Housing Agency |
| | Agency/Group/Organization Type | Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Civic Leaders |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted in person, over the phone, and through email multiple times during the planning period. Outcomes of the consultation are continued support for housing projects and technical assistance as needed. Moorhead Public Housing Agency (MPHA) discussed their current coordination with CAPLP (Community Action Lakes and Prairies) regarding homeless individuals sleeping in the stairwells and entrances. MPHA discussed how this has increased over the past year resulting in increased police calls to the building and increased drug activity. MPHA is coordinating with CAPLP's homeless outreach workers and meets with them weekly. the outreach workers have been given access to the building to do sporadic checks and walk throughs in hopes to interact and assist individuals who are not tenants but whom are sleeping in the common areas. The hope is to connect these individuals with appropriate services. |

| | | |
|---|--|--|
| 2 | Agency/Group/Organization | Clay County Housing and Redevelopment Authority |
| | Agency/Group/Organization Type | Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Civic Leaders |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Market Analysis Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted over the phone and through email during the planning period. Outcomes of the consultation are continued support for housing projects, particularly permanent supportive housing projects for the homeless. |
| 3 | Agency/Group/Organization | LAKES AND PRAIRIES COMMUNITY ACTION PARTNERSHIPS |
| | Agency/Group/Organization Type | Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Education |

| | | |
|---|--|--|
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted in person, over the phone, and through email during the planning period. Outcomes of the consultation are maintaining relationships to better understand the needs and assets of the Moorhead community, partnering on solutions when needed. |
| 4 | Agency/Group/Organization | Churches United for the Homeless |
| | Agency/Group/Organization Type | Housing Services - Housing Services-homeless |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Churches United operates two homeless shelters and one food bank. Consulted via email and phone during the planning period. Outcomes of the consultation are maintaining relationships to better understand homelessness in Moorhead, partnering on solutions when needed. |

| | | |
|---|--|--|
| 5 | Agency/Group/Organization | Clay County Social Services |
| | Agency/Group/Organization Type | Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims Health Agency Child Welfare Agency Other government - County |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Market Analysis Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted via email during the planning period. Outcomes of the consultation are maintaining relationships to better understand needs in Moorhead, partnering on solutions when needed. |
| 6 | Agency/Group/Organization | West Central Minnesota Continuum of Care |
| | Agency/Group/Organization Type | Services-homeless Regional organization |

| | | |
|---|--|--|
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted via Webex during the planning period. Outcomes of the consultation are maintaining relationships to better understand homelessness in Moorhead, partnering on solutions when needed. |
| 7 | Agency/Group/Organization | Lake Agassiz Habitat for Humanity |
| | Agency/Group/Organization Type | Housing |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Market Analysis |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted via phone and email during the planning period. Outcomes of the consultation are maintaining relationships to better understand the needs of people living in Moorhead, partnering on solutions when needed. |
| 8 | Agency/Group/Organization | Cass Clay Community Land Trust |
| | Agency/Group/Organization Type | Housing |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Market Analysis |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted in person, via phone, and email during the planning period. Outcomes of the consultation are maintaining relationships to better understand the needs of people living in Moorhead, partnering on solutions when needed. |

| | | |
|----|--|---|
| 9 | Agency/Group/Organization | Sparklight |
| | Agency/Group/Organization Type | Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Business Leaders Major Employer |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs Market Analysis |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted in person, via phone, and email during the planning period. Discussed market needs, service available in the community. Gathered information on accessibility of internet services for public housing tenants. Learned information on available programs for all low-income residents to access broadband services. Outcomes of the consultation are maintaining relationships to better understand the needs of people living in Moorhead, partnering on solutions when needed, sharing program details with partners. |
| 10 | Agency/Group/Organization | Midco |
| | Agency/Group/Organization Type | Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Business Leaders Major Employer |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs Market Analysis |

| | | |
|----|--|---|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted in person, via phone, and email during the planning period. Discussed market needs, service available in the community. Gathered information on accessibility of internet services for public housing tenants. Learned information on available programs for all low-income residents to access broadband services. Outcomes of the consultation are maintaining relationships to better understand the needs of people living in Moorhead, partnering on solutions when needed, sharing program details with partners. |
| 11 | Agency/Group/Organization | Clay County Public Health |
| | Agency/Group/Organization Type | Services-Health Health Agency Agency - Emergency Management Other government - County Civic Leaders |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs COVID |

| | | |
|----|---|--|
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>Consulted with local county public health regarding emergency management services for resiliency. Consulted during the planning period on an ongoing basis via in-person meetings, emails, and virtual meetings. Meetings were held regularly to discuss overflow homeless shelter needs, covid quarantine needs for homeless individuals accessing the shelters, food supply needs, etc. Emergency management personnel from the City and County attended these meetings. The City of Moorhead and Clay County share concerns regarding mitigating the threats of natural hazards, especially as climate change poses to amplify them as low-to moderate-income residents are disproportionately impacted. The greatest natural hazard risks faced by Moorhead residents are flooding, severe storms, strong winds, and droughts. Discussions took place in regard to the region's response to flooding and the FM Area Diversion progress and construction that is occurring. Outcomes included increased awareness of community emergency management needs and coordination of local resources. The City has some ongoing projects that are working to address needs identified.</p> |
| 12 | <p>Agency/Group/Organization</p> | <p>FAMILY HEALTHCARE CENTER</p> |
| | <p>Agency/Group/Organization Type</p> | <p>Services-homeless Services-Health Health Agency</p> |
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Homeless Needs - Chronically homeless Non- Housing Community Needs</p> |
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>Email, and in person. Consulted to gain knowledge on their mobile clinic and what areas they serviced in the City of Moorhead. Their mobile clinic is currently providing dental care to Moorhead public schools for students who don't have access to dental care. Outcome of consultation is to build relationships and identify needs.</p> |

| | | |
|----|--|---|
| 13 | Agency/Group/Organization | FARGO MOORHEAD METROPOLITAN COUNCIL OF GOVERNMENTS |
| | Agency/Group/Organization Type | Other government - Local Planning organization |
| | What section of the Plan was addressed by Consultation? | Market Analysis Economic Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Email. To build relationship; identify needs. Currently they are doing a housing market needs study. |
| 14 | Agency/Group/Organization | Moorhead Public Schools |
| | Agency/Group/Organization Type | Services-Children Services-Persons with Disabilities Services-Education |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Families with children |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Email, Outreach. Anticipated outcome to build relationship to better understand educational needs in Moorhead along with how the school district collaborates and works with children residing in homeless shelters. Moorhead public school added a new position in 2020 dedicated to work with students experiencing homelessness. |
| 15 | Agency/Group/Organization | Greater Minnesota Community Services |
| | Agency/Group/Organization Type | Services - Housing Services-homeless Services-Health Services- Mental Health |

| | | |
|----|--|---|
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | consulted by email and over the phone. continue to build relationship and better understand the mental health issues and housing issues that homeless and low-income individuals face. |
| 16 | Agency/Group/Organization | City of Moorhead |
| | Agency/Group/Organization Type | Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - Local |
| | What section of the Plan was addressed by Consultation? | Emergency Management/Resiliency |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted by email and in person discussions. Discussions with the City of Moorhead's Utilities Engineer for wastewater and storm water operations. Discussions took place with Andrea Crabtree, Engineer, and public works staff who manage the flood control system. Discussed flood prone areas, public land and water resources, and discussed emergency management agencies such as the Red Cross. Discussions with Andrea also included her working with Houston Engineering on conducting a study on climate change and resilience planning. The study will focus on "other" flood event that occurs in the City of Moorhead which is localized flooding due to heavy rainfall. The study looks at potential impacts of street flooding, sanitary sewer overload, and property damage. Anticipated outcome/areas or areas for improved coordination: to improve. departmental relationships and knowledge of community development needs and how that relates to emergency management. |

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

The City of Moorhead consulted a well-rounded list of agencies and organizations, and did not deliberately omit any from the 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 | West Central Minnesota Continuum of Care | "Consistently facilitate the movement of individuals/families toward permanent housing and successful independent living." Moorhead plans to continue support of coordinated assessment, transportation opportunities (OUT), and fostering relationships/partnerships with service providers responding to homelessness daily. "Providing the housing and /or services needed to help individuals move into transitional and permanent housing". Moorhead plans to build or rehabilitate 15 rental housing units and does so through partnerships with area agencies (e.g., MPHA, CCHRA, CCRI). Moorhead also plans to rehabilitate or construct 40 affordable housing units and construct, including 5 Habitat for Humanity homes (or similar organization). "Promote access to and effective use of mainstream programs". Moorhead plans to continue support of coordinated assessment development, which will meet this goal. |

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|--------------------------|----------------------------------|--|
| 2020-2022 Strategic Plan | Minnesota Housing Finance Agency | <p>"We finance pre- and post-purchase counseling, education, coaching, and financial empowerment; mortgages and down payment/closing-cost assistance; and home improvement loans." Moorhead's strategy overlaps with its homebuyer education through the Lakes & Prairies Community Action Partnership. Education is approved by MHFA, allowing applicants to obtain loan products from MHFA, which are briefly discussed by City staff at each class. "Existing housing is typically the most affordable, and preserving it is more cost effective than building new. Moorhead's strategy overlaps with its Single-Family Rehabilitation program, which maintains and improves existing affordable homes. Through energy efficiency improvements, it also makes homes more affordable by reducing costs spent on utilities. Moorhead plans to build or rehabilitate 15 rental housing units and does so through partnerships with area agencies (e.g., MPHA, CCHRA, CCRI). "Strategic Priority: Prevent and End Homelessness. Moorhead plans to continue support of coordinated assessment, transportation opportunities (OUT), and fostering relationships/partnerships with service providers responding to homelessness daily.</p> |

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

This section summarizes the consultation process with an introduction, a summary of the City's activities to enhance coordination between public and assisted housing providers and private governmental health, mental health, and service agencies, a summary of the coordination with the Continuum of Care and efforts to address the needs of homeless persons and persons at risk of homelessness, a list of organizations consulted, a summary of how the goals of the strategic plan overlap with plans of the Minnesota Housing Finance Agency and the West Central Minnesota Continuum of Care, and a description of cooperation and coordination with other public entities.

AP-12 Participation – 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

Stakeholder participation is vital to the City of Moorhead in identifying community development needs, reviewing the benchmarks for ongoing housing and community development programs. The City of Moorhead obtains citizen input through conversations with people, consulting with housing and service providers, and other arms of local government in an effort to capture Moorhead's community development needs.

As publicized through newspaper advertisement, on the City of Moorhead's website, along with email notifications to citizens who elected to receive notifications a public meeting was held on September 15, 2023. The meeting consisted of one City of Moorhead staff and one citizen. No comments were received. The 30-day comment period on the 2024 Annual Action Plan draft was from November 23, 2023 – December 23, 2023. The proposed action plan was made available on the City's website and at the public library. City staff also worked with local service agencies that service low-to-moderate income clientele in order to solicit input during the planning process. A public hearing was held on December 11, 2023. In order to accommodate disabled persons and non-English speakers, all advertisements included this language, "In advance of the public hearing, alternative formats of this information or accommodation for persons with disabilities or limited English proficiency will be made upon request (10 hours' notice is required). To make arrangements for services, call 218-299-5434; for TDD/Relay service dial 711."

Also taken into consideration for the 2024 Annual Action Plan was the in-depth citizen participation and consultation that took place during the creation of the Consolidated 2020-2024 Plan. Citizens were engaged in the planning by means of a community survey that was prepared and administered by the City. The purpose of the survey was to have citizens identify the most important housing and non-housing community development needs in Moorhead and gain insight into fair housing. See Appendices for survey. The survey results were compared alongside notes taken during conversations with local service providers/agencies (consultations) and statistical data provided by agencies or the US Census Bureau. The survey was ultimately used to illustrate correlations among citizens, service providers, agencies, and available data. 335 people participated in the development of the 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 | There was one City of Moorhead staff and one citizen in attendance. | No comments were received. | All comments are accepted and considered in the development of the 2024 Action Plan for Housing and Community Development. | |
| 2 | Internet Outreach | Non-targeted/broad community | Meeting and public comment period e-notification through internet and social media. | None received | All comments are considered | |
| 3 | Newspaper Ad | Non-targeted/broad community | Public meeting and public comment period notification included in newspaper ad. | N/A | NA | |
| 4 | Public Hearing | Non-targeted/broad community | There were citizens in attendance, though there were no comments received at the public hearing. | None received | NA | |

Table 4 – Citizen Participation Outreach

DRAFT

Expected Resources

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

Introduction

Community Development Block Grant funds must address one of three National Objectives; benefit low to moderate income individuals, prevention of slum and blight conditions (i.e., vacant buildings, code enforcement, and removal of unsafe structures), and to address urgent need that threatens the health, safety, and welfare of the community’s residents. This section briefly summarizes anticipated resources for 2024 along with a short explanation of how federal funds will leverage additional resources (private, state, and local). The City of Moorhead anticipates a total of \$463,000 in combined resources to address the priority needs for the 2024 program year. This amount is comprised of CDBG award amounts and program income estimates.

Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|-----------------|---------------|----------------------------------|-----------------------|-----------------------------|--------------|--|-----------------------|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| | | | | | | | | |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|---|-----------------------|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 313,000 | 150,000 | | 463,000 | The City of Moorhead is in its fifth year of its 2020-2024 Consolidated Plan. Expected resources have been allocated for 2024 activities. Any additional or unforeseen program income will be allocated to Home Rehabilitation. Because these funding sources are subject to annual Congressional appropriations and potential changes in funding distribution formulas, the expected amount available for the remainder of the Con Plan, which includes program income estimations, is subject to change with availability of funding. | |

Table 5 - Expected Resources – Priority Table

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

CDBG funds for housing activities are regularly leveraged against and combined with state and federal resources managed by Minnesota Housing Finance Agency, including Start Up, Step Up, and Fix Up and Community Fix Up loans, Rehabilitation Loan/Emergency and Accessibility Loan Programs, Minnesota Housing Community Development, down payment and closing cost assistance loans, multi-family loans and programs, and Foreclosure Prevention through Minnesota Homeownership Center. Public service activities have many sources of matching funds (public and private), including the State of Minnesota. Contributors for metropolitan activities and organizations (i.e., Lakes & Prairies Community Action Partnership -Homebuyer Education Program, Habitat for Humanity – acquisition for affordable housing, Fargo Moorhead Coalition to End Homelessness -transportation and coordinated assessment, and Freedom Resource Center –accessible ramps) include the State of North Dakota

and City of Fargo, among several other private and public donors and foundations.

DRAFT

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

The City will consider the use of publicly owned land or other property located with the jurisdiction for the construction of affordable housing for low to moderate income households or to address blighted conditions. The City of Moorhead understands the risk of holding land for extended periods of time and takes this into consideration along with the advantages prior to utilizing publicly owned land.

Discussion

CDBG Program Administration and activities designated as “Public Services” are subject to statutory expenditure limits. The Public Services limit is 15% of the grant plus prior year program income. The Program Administration limit is 20% of the grant plus current year program income. 2024 Program Administration funds may be used for startup planning and administrative costs of future grant years (24 CFR 570.200(g)(3)). Annual activity budgets will be within these limits. CDBG awards between 2024 and 2025 may be greater or less than what is projected.

- Reductions to estimated program income or grant award will first reduce the Acquisition activity. If the reduction exceeds the acquisition activity, the City may conduct a plan amendment in accordance with the City of Moorhead's Citizen Participation Plan.
- Revenue received that exceeds estimated program income or a grant award more than estimated will be applied to home rehabilitation loans, or the City may conduct a plan amendment in accordance with the City of Moorhead's Citizen Participation Plan.
- Funds allocated to home rehabilitation projects not underway by June 30 of the program year may be redirected to blight removal activities.
- Citizens Participation Plan requires a substantial amendment if fluctuations are greater than \$20,000 or more than 25% of an approved activity budget.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|------------------------|------------|----------|--------------------------------|-----------------|--|-----------------|--|
| 1 | AH1 Affordable Housing | 2020 | 2024 | Affordable Housing | | Affordable Housing | CDBG: \$82,000 | Rental units rehabilitated: 50 household housing units |
| 2 | AH2 Affordable Housing | 2020 | 2024 | Affordable Housing | | Affordable Housing | CDBG: \$228,000 | Homeowner Housing Added: 0 Household Housing Unit Homeowner Housing Rehabilitated: 6 Household Housing Unit |
| 3 | AH4 Affordable Housing | 2020 | 2024 | Affordable Housing | | Affordable Housing | CDBG: | Public service activities for Low/Moderate Income Housing Benefit: |
| 4 | AH5 Affordable Housing | 2020 | 2024 | Affordable Housing | | Affordable Housing | CDBG: \$0 | Other: 20 Other |
| 5 | HL1 Homelessness | 2020 | 2024 | Affordable Housing Homeless | | Affordable Housing Homelessness Services and Prevention | CDBG: \$0 | Other: 1 Other |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|---|------------|----------|-----------------------------------|-----------------|---|----------------|--|
| 6 | HL2 Homelessness | 2020 | 2024 | Homeless | | Homelessness Services and Prevention | CDBG: \$15,200 | Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted |
| 7 | SN1 Non-Homeless Special Needs Services | 2020 | 2024 | Non-Homeless Special Needs | | Non-Homeless Special Needs Services | CDBG: \$0 | Other: 1 Other |
| 8 | NH2 Non-Housing Community Development Needs | 2020 | 2024 | Non-Housing Community Development | | Non-Housing Community Development Needs | CDBG: \$16,700 | Public service activities other than Low/Moderate Income Housing Benefit: 105 Persons Assisted |
| 9 | SN2 Non-Homeless Special Needs Services | 2020 | 2024 | Non-Homeless Special Needs | | Non-Homeless Special Needs Services | CDBG: | Homeowner Housing Rehabilitated |
| 10 | AH3 Affordable Housing | 2020 | 2024 | Affordable Housing | | Affordable Housing | CDBG: | |
| 11 | NH-3 Slum & Blight Removal | 2020 | 2024 | Non-Housing Community Development | | Non-Housing Community Development Needs | CDBG: | Buildings Demolished: |
| 12 | SN3-Non-Homeless Special Needs Services | 2020 | 2024 | Non-Homeless Special Needs | | Non-Homeless Special Needs Services | CDBG: \$28,500 | Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|---|-------------------------|--|
| 1 | Goal Name | AH1 Affordable Housing |
| | Goal Description | Rehabilitate affordable rental housing units. Moorhead Public Housing Agency – CDBG funds will assist with sprinkler head on fire suppression system and replacement of fire location panel at Sharp View Apartments. |
| 2 | Goal Name | AH2 Affordable Housing |
| | Goal Description | Rehabilitate or construct 35 affordable housing units for homeownership by 2024. CDBG resources will be used for rehabilitation activities; CDBG resources used for construction activities will be leveraged against funds from Minnesota Housing Finance Agency and/or Greater Minnesota Housing Fund, and energy efficiency funds from Moorhead Public Service. Annual goal is 7 units per year (3 to be made available to households earning not more than 60% MFI and 4 to be made available to households earning not more than 80% MFI). Single Family Home Rehabilitation |
| 3 | Goal Name | AH4 Affordable Housing |
| | Goal Description | Create homeownership opportunity for 150 households through use of down payment assistance and/or below market interest rate mortgages for first time homebuyers. CDBG resources will be used for homebuyer education programs needed to access Minnesota Housing and Greater Minnesota Housing Funds homeownership assistance programs; Annual goal is 30 households per year (15 households below 60% MFI and 15 households between 60 - 80% MFI). Lakes & Prairies Community Action Partnership - 30 households |
| 4 | Goal Name | AH5 Affordable Housing |
| | Goal Description | Support and encourage the efforts of governmental and private agencies seeking to reduce the cost burden of low-income households through certificate and voucher programs by providing letters of support and technical assistance with background information upon request. While not within the City of Moorhead’s control, it is hoped that the number of rental subsidies available in Moorhead increases by at least 20 per year, or 100 over the five-year period. |

| | | |
|---|-------------------------|--|
| 5 | Goal Name | HL1 Homelessness |
| | Goal Description | Support the continuation and expansion of emergency, transitional and permanent supportive housing available to homeless persons in the community. While the City of Moorhead's CDBG allocation is not sufficient to provide primary support to construct housing units, it can serve as a leverage source to support applications to primary funding agencies and support. The goal is to assist with 1 application in 2020. |
| 6 | Goal Name | HL2 Homelessness |
| | Goal Description | Support the initiatives of service providers to expand homeless prevention services including outreach, coordinated assessment, shelter services, transportation, and transitional housing through survey research, technical support, certificates of consistency for funding applications, transportation vouchers, and other means. Opportunities Under Transit - bus passes |
| 7 | Goal Name | SN1 Non-Homeless Special Needs Services |
| | Goal Description | Support initiatives of service providers to maintain and expand services, outreach, and assessment for special needs populations through technical support, certificates of consistency for funding applications, and other means. |
| 8 | Goal Name | NH2 Non-Housing Community Development Needs |
| | Goal Description | Partner to address the needs of low-income youth by providing positive recreational and developmental opportunities. Romkey Park Program -25 youth/individuals Afro-American Development Association Youth Program - 80 youth and young adults |
| 9 | Goal Name | SN2 Non-Homeless Special Needs Services |
| | Goal Description | Rehabilitate affordable homes specifically through the construction of accessibility ramps or addition of assistive devices for households with a disabled household member. CDBG resources will be used for construction materials and/or labor and assistive devices (e.g., door handles, grab bars). Assist low-to-moderate income homeowners who are elderly and/or disabled with snow removal services. CDBG funds will be used for snow removal. |

| | | |
|----|-------------------------|--|
| 10 | Goal Name | AH3 Affordable Housing |
| | Goal Description | Construct at least 5 affordable housing units for homeownership by 2024, specifically through partnership with Habitat for Humanity or other qualified non-profit organization. CDBG resources will be used for land acquisition and/or utility installation costs (special assessments) and will leverage private individual and corporate donations. One of the five homes is to be made available to households earning less than 60% MFI and 4 to be made available to households earning not more than 80% MFI. |
| 11 | Goal Name | NH-3 Slum & Blight Removal |
| | Goal Description | . |
| 12 | Goal Name | SN3-Non-Homeless Special Needs Services |
| | Goal Description | |

Projects

AP-35 Projects – 91.220(d)

Introduction

Activities are direct responses to the need’s assessment and market analysis in the 5-Year Plan and ongoing consultations and citizen participation. Priority areas include affordable housing, homelessness, non-homeless special needs, and non-housing community development. The following chart provides descriptions and expenditures of 2024 activities.

The City undertakes multiple activities to Affirmatively Further Fair Housing such as supporting the Moorhead Human Rights Commission’s education efforts, through the homebuyer education CDBG activity, and through support of organizations that provide Fair Housing services in the community.

Projects

| # | Project Name |
|---|----------------------------------|
| 1 | Home Rehabilitation Loan Program |
| 2 | Opportunities Under Transit |
| 3 | Romkey Park Youth Programming |
| 4 | Youth Program-AADA |
| 5 | Capital Needs - MPHA |
| 6 | Program Administration |
| 7 | Snow Removal Assistance |

Table 7 - Project Information

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

Allocation priorities are a result of citizen participation, consultations with local service providers, statistical data, needs assessment, market analysis, and evaluation of past performance.

The City of Moorhead’s highest priority for community development resources continues to be maintaining and creating affordable housing opportunity within the community. Both the US Census data and local needs assessment information contained within the 5-Year plan indicate a significant number of both low-income renter and homeowner households with high-cost burdens and other housing problems. Moorhead’s housing stock, while generally affordable, is aging, indicating a need for housing preservation activities and creation of additional new housing units. As population continues to grow, the City of Moorhead must be deliberate in its planning efforts to ensure affordable housing is part of development throughout the City. Obstacles to meeting underserved needs include resource limitations, both the CDBG allocation and the resources of partner agencies and funders is not as high as it was in the past.

DRAFT

AP-38 Project Summary

Project Summary Information

| | | |
|---|--|--|
| 1 | Project Name | Home Rehabilitation Loan Program |
| | Target Area | |
| | Goals Supported | AH2 Affordable Housing |
| | Needs Addressed | Affordable Housing |
| | Funding | CDBG: \$228,000 |
| | Description | City-wide rehabilitation loan program assisting owner-occupants of single-family homes whose income falls below 80% of area median income. Funds are provided on a loan basis up to \$20,000 provided sufficient home equity exists and up to an additional \$5,000 if needed to repair the home to standard condition. No interest accrues on the loan and the entire principal balance must be repaid upon sale, title transfer or owner vacancy of the property. Applications from interested individuals are accepted by the City on a first come, first served basis. The program is administered by the City of Moorhead. Includes program administration. |
| | Target Date | |
| | Estimate the number and type of families that will benefit from the proposed activities | A total of 6 low-to-moderate income households are estimated to benefit from the Home Rehabilitation Loan Program. |
| | Location Description | City-wide |
| | Planned Activities | Rehabilitation of existing housing stock for low to moderate income households. |
| 2 | Project Name | Opportunities Under Transit |
| | Target Area | |
| | Goals Supported | HL2 Homelessness |

| | | |
|----------|--|---|
| | Needs Addressed | Homelessness Services and Prevention |
| | Funding | CDBG: \$15,200 |
| | Description | Discounted bus pass voucher program for persons who are homeless or extremely low income (less than 30% median income) to provide transportation. The program can be accessed for monthly bus passes up to four times per year per participant. The program will be administered by Metro Area Transit. Include program administration. |
| | Target Date | 06/30/2025 |
| | Estimate the number and type of families that will benefit from the proposed activities | 150 extremely low-income individuals |
| | Location Description | City-wide transportation |
| | Planned Activities | Provide discounted bus pass voucher for persons who are homeless or extremely low-income. |
| 3 | Project Name | Moorhead Park Youth Programming |
| | Target Area | |
| | Goals Supported | NH2 Non-Housing Community Development Needs |
| | Needs Addressed | Non-Housing Community Development Needs |
| | Funding | CDBG: \$8,500 |
| | Description | Recreation activity programming, meal program and/or activities for youth in low-income neighborhoods conducted by Moorhead Parks & Recreation Department. Participating youth range in age from 3-17 years, the predominant age of participants is under 12 years. Includes program administration. |
| | Target Date | 12/31/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | at least 25 youth/individuals will benefit from this program. |

| | | |
|---|--|---|
| | Location Description | Romkey Park 900 19 St S Located in a lower income neighborhood, near a college campus and industrial park. |
| | Planned Activities | Provide recreational programming for 25 youth/individuals. |
| 4 | Project Name | Youth Program-AADA |
| | Target Area | |
| | Goals Supported | NH2 Non-Housing Community Development Needs |
| | Needs Addressed | Non-Housing Community Development Needs |
| | Funding | CDBG: \$8,200 |
| | Description | The Afro-American Development Association offers a Youth Program for those age 14-24. Their goal is to shape a positive future through discovering their unique talents and abilities by experiencing meaningful activities, education, building career awareness, and accessing valuable work experiences. |
| | Target Date | 12/31/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 80 youth ages 14-24 from low-to-moderate income households, predominantly New American households. |
| | Location Description | 1132 28 Ave S |
| | Planned Activities | Career exploration/awareness, mentoring, sports, supportive services, transportation, housing application assistance, post-secondary admission application assistance, financial aid application assistance |
| 5 | Project Name | Capital Needs - MPHA |
| | Target Area | |
| | Goals Supported | AH1 Affordable Housing |
| | Needs Addressed | Affordable Housing |

| | | |
|---|--|--|
| | Funding | CDBG: \$82,000 |
| | Description | CDBG funds will be used to assist Moorhead Public Housing Agency with rehabilitation work on their Highrise and Sharpview Apartments. Work will include replacement of sprinkler heads on the buildings fire suppression system to ensure the safety of their residents. The Highrise apartment has 104 units and Sharpview apartments has 47 units. |
| | Target Date | 12/31/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | MPHA's Sharpview contains 47 units of senior housing. All families residing in the units are low-to-moderate income households. |
| | Location Description | Sharpview 920 5th Ave S |
| | Planned Activities | CDBG funds will be used to assist Moorhead Public Housing Agency with rehabilitation work on their Sharpview Apartments. Work will include replacement of sprinkler heads on the buildings fire suppression system to ensure the safety of their residents. Sharpview apartments has 47 units. |
| 6 | Project Name | Program Administration |
| | Target Area | |
| | Goals Supported | |
| | Needs Addressed | |
| | Funding | CDBG: \$92,600 |
| | Description | Staff support for the planning, implementation, reporting and monitoring of CDBG resources. |

| | | |
|---|--|--|
| | Target Date | 12-31-2024 2024 Program Administration funds may be used for startup planning and administrative costs of future grant years (24 CFR 570.200(g)(3). |
| | Estimate the number and type of families that will benefit from the proposed activities | |
| | Location Description | |
| | Planned Activities | Program Administration |
| 7 | Project Name | Snow Removal Assistance |
| | Target Area | |
| | Goals Supported | SN2 Non-Homeless Special Needs Services |
| | Needs Addressed | Non-Homeless Special Needs Services |
| | Funding | CDBG: \$28,500 |

AP-50 Geographic Distribution – 91.220(f)

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

While there are no specified "Target Areas" identified in the 2024 Action Plan, the City of Moorhead does prioritize community development activities to neighborhoods that are predominantly low-to-moderate income areas. In Moorhead there is a high percentage of low-to-moderate income individuals concentrated in the Romkey Park Neighborhood. This neighborhood park is the location of one public service activity in which children of this neighborhood participate in after school programming.

Romkey Park - 800 19 street south Moorhead. Expected resources for the program year 2024 is \$463,000 and \$8500 of that is allocated to the Romkey Park after school program which is 1.8%.

Geographic Distribution

| Target Area | Percentage of Funds |
|--------------------|----------------------------|
| | |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

To provide a suitable living environment for low to moderate income households, particularly those with children

Geographic area is City Wide for CDBG funding. The Geographic Distribution Table above is not editable as there are no HUD approved target areas in Moorhead.

Discussion

Single family rehabilitation often occurs in areas of the city where homes are deteriorating due to age and maintenance, though there are no geographic area requirements.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The most common housing need reported in Moorhead is a shortage of affordable housing stock. The existing housing stock does not fully meet the needs of the community, specifically low-income households. Data shows about 45% of Moorhead’s households have income at or below 80% of the area median income. Affordable housing and income are directly connected. HUD explains, “Families who pay more than 30% of their income for housing are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation, and medical care.” Over 41% of Moorhead households are experiencing housing cost burden greater than 30% of their income [2018 ACS DP04].

Based on the data and consultations, the populations or household types more affected than others by housing problems are low-income households including:

- Single person and single parent households
- People fleeing domestic violence
- People with a criminal history, poor rental history, no credit or poor credit
- Larger families
- People with mental health and/or chemical dependency issues
- Native Americans who represent 20% of the local adult homeless population (1.5% of the general population - 2019 ACS data)
- Black or African Americans who represent 19% of the local adult homeless population (6.2% of the general population - 2019 ACS data)
- People with a disability

| One Year Goals for the Number of Households to be Supported | |
|---|-----|
| Homeless | 150 |
| Non-Homeless | 47 |
| Special-Needs | 0 |
| Total | 197 |

Table 9 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through | |
|---|----|
| Rental Assistance | 0 |
| The Production of New Units | 0 |
| Rehab of Existing Units | 53 |

| One Year Goals for the Number of Households Supported Through | |
|--|----|
| Acquisition of Existing Units | 0 |
| Total | 53 |

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The one-year goals listed above are associated with 2024 activities, but the completion and reporting of those activities will happen span over two years due to construction schedules. 2024 activities that attribute to affordable housing, in accordance with HUD's definition of affordable housing per 24 CFR 92.252 and 24 CFR 92.254, is as follows:

- Home Rehab Program, goal of rehabilitating six homes for qualifying homeowners
- Rehabilitation to Moorhead Public Housing Sharp View Apartments, 47 units

DRAFT

AP-60 Public Housing – 91.220(h)

Introduction

Moorhead Public Housing Agency (MPHA) reports a total of 198 housing units in Moorhead. The majority (151) are under the HUD's Public Housing program. MPHA continues to rent these units under the Moorhead Affordable Housing LLC to people who are low income. A total of 256 people are living in MPHA properties, 60 of those are children. MPHA continues to manage a waiting list for public housing and scattered site properties. Currently, there are 257 households are on the waiting list for these units.

In September of 2021, MPHA partnered with the City of Moorhead to acquire 34 units known as Maple Court Townhomes. MPHA purchased half of the units and the City of Moorhead purchased the other half. These are Low Income Housing Tax Credit units.

Clay County Housing and Redevelopment Authority (CCHRA) reported their housing voucher waiting list has been closed to the general population since 2010 and is only opened for specific preference categories at certain times. There are 96 households on the waitlist for their Fieldcrest Townhomes development. Fieldcrest is currently undergoing a \$6million dollar renovation so the wait list is currently closed. Most of their vouchers are based in Moorhead where there are 187 Mainstream vouchers and 757 Housing Choice Vouchers. Of the 757 funded Housing Choice Vouchers, 40 are VASH (veterans) and 187 are Mainstream vouchers, 30 Tenant Protection Vouchers, 1 Foster Youth to Independent vouchers, 15 Emergency Housing Vouchers and 474 regular vouchers (40 of the 474 are Tenant Protection, there are 29 project-based vouchers and 16 are being used for homeownership).

Actions planned during the next year to address the needs to public housing

Provide technical assistance as needed (i.e., environmental reviews), construct or rehabilitate public housing units. It is planned in 2024 to address the need of fire sprinkler heads at their SharpView Apartments.

Support and encourage Moorhead Public Housing Agency efforts to reduce the cost burden of low-income households through certificate and voucher programs by providing letters of support and other technical assistance.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Moorhead Public Housing Agency (MPHA) was awarded a three-year renewal of its ROSS grant from HUD in April of 2021. ROSS stands for Resident Opportunity and Self Sufficiency. This federal grant funds assist residents with connecting to services and supports within the Fargo-Moorhead community. The majority of MPHA residents have a disability or are elderly and many are extremely low-income. Information on what services are out there and how to access them can be challenging to

navigate. The ROSS Coordinator position assists residents to identify goals (of which homeownership may be one) and connect to services to increase health and other quality of life outcomes.

River View Heights is a 14 Story High Rise with 104 units. In 2018 a community garden was created on land near the High Rise owned by MPHA. The River View Garden provides residents with access to nutritious food, opportunities to connect with others in the community, and an outdoor opportunity to garden which is proven beneficial to those struggling with mental illness. MPHA also facilitates weekly food distribution from Great Plains Food Bank at both apartment locations.

MPHA also collaborates and works with a number of organizations to bring more individualized services to residents. Examples include home health care, mental health supports, case management, Hospice, Meals on Wheels, NAPS for seniors, employment services and transportation. MPHA collaborates with agencies such as Lakeland Mental Health, CCRI, Sanford home health, Summit Guidance, Valley Senior Services, Lakes and Prairies CAPLP (homebuyer education provider), Hospice of the Red River Valley, Clay County Social Services, West Central Initiative, Metro Senior Rides, Essentia home health, and many more. In addition, MPHA worked to provide education and assistance to residents about how to prevent the spread of COVID 19.

MPHA staff are committed to the mission of the organization which includes promoting positive outcomes for the residents and the community we serve. Staff participate and serve on a number of boards and committees that are dedicated to this to advocate for the population that resides in public housing. Examples include: 2020 Census Complete Count Committee, Successful Outcomes for Tenants and Landlords (SOFTL), Regional Adult Mental Health Initiative Steering Committee, West Central Continuum of Care Board, Program Coordination Committee, Lakes & Prairies CAPLP Housing Advisory Board and Consumer Action Board. The Consumer Action Board is the newest group and consists of individuals who are living in public housing, supportive housing, homeless shelters, and in the community on housing supports. There is currently one resident of MPHA that serves on this board. The individuals are able to share their journeys to find and maintain housing and provide ideas on how current systems could be improved to better serve people.

MPHA is governed by 5 board members, 1 of which is specifically designated for a resident of public housing. MPHA staff also meets regularly with residents to obtain input on capital improvement projects and other issues important to residents.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The Moorhead PHA is not 'troubled'.

Discussion

There are hundreds of people on the waiting lists for housing vouchers. There are also some vouchers

for use in private sector housing which are not being used because of high rental rates, property owners/managers who will not accept vouchers, and/or because of decreased voucher funding. While not within the City of Moorhead's control, it is hoped that the number of rental subsidies available in Moorhead increases by at least 20 per year, or 100 over the five-year period. Moorhead will continue to take actions to address the needs of public housing as described in this section.

DRAFT

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The FM Coalition to End Homelessness released a report titled *State of Homelessness in Fargo-Moorhead Metro* on June 28, 2022. The report details a significant number of homeless adults and their children in Fargo, ND and Moorhead, MN, indicating that homelessness is still a major issue in the Fargo Moorhead community. Fargo, Moorhead, and West Fargo Homeless School Liaisons began tracking data on the total youth experiencing homelessness in the school systems. In the 2021-2022 school year, there was an estimate of 650 children from pre-K-12th grade experiencing homelessness. Additionally, 21% of these youth were also parents. According to data available in HMIS, in 2021, 1,156 individuals made up family households led by an adult who received homeless services either in Cass County, ND, or Clay County, MN. These 1,156 make up 328 unique family units. With 63% of those served in these households are children under age 18.

According to data available in the Homeless Management Information System (HMIS), in 2021, 3,554 individuals received homeless services either in Cass County, ND, or Clay County, MN. This is an increase of 424 people served from the previous year. Clay county served an additional 452 individuals and Cass County served 28 less than in 2020.

There are various reasons why people leave their housing and are unable to secure different housing. Individuals experiencing homelessness in our community face many barriers to sustainability, specifically when it comes to gaining and maintaining livable-wage employment and safe, stable housing. According to the *State of Homelessness* report, in Clay County the top contributor to respondents' housing crisis was not being able to afford their rent (57%). Poor credit was the second-highest contributor to their current housing crisis (41%). Mental health symptoms, criminal history barriers, and substance use were also noted as causes to a current housing crisis.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Continued support and funding of the Coordinated Assessment and Referral and Evaluation System (CARES) and Opportunities Under Transit (OUT). The West Central Coc's annual Point-in-Time (PIT) Count is one of the primary data pieces that the City uses to identify the numbers and needs of people experiencing homelessness in Moorhead. The PIT count involves outreach by several partners to survey all individuals who are sheltered and unsheltered on one given night. The City of Moorhead will continue to meet with the CoC coordinator quarterly and review data and discuss needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

Fargo and Moorhead homeless shelters utilize a single-entry diversion through a homeless hotline (in partnership with First Link, the 211-phone hotline provider). This helps divert individuals from entry into the homeless system, as well as link them to appropriate mainstream services. Coordinated assessment links individuals to transitional housing based on their VI-SPDAT score.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Coordinated Access, Referral, Entry & Stabilization (CARES) System is a partnership of agencies collecting and sharing information in CARES approved databases to provide a more coordinated homeless response system. The goal of CARES is to provide individuals with the right information about services to help them successfully obtain and retain housing based on a Housing First methodology. All projects must conduct an annual Housing First assessment which is reviewed by the West Central Minnesota CoC Performance Evaluation Committee. CARES utilize the SPDAT assessments for prioritization and linkage to housing and to promote housing stabilization once housed. Linkage (not just referrals) to mainstream resources is essential to stabilization as well.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The West Central Minnesota Continuum of Care (CoC) participates in statewide prison discharge fairs and partners with regional mental health and family collaborative groups to assure practices and policies are in place and being utilized to avoid discharging someone into homelessness. The local medical facilities partner with local shelters to provide onsite shelter nursing staff which has significantly decreased discharges from healthcare facilities into shelters and helped to advocate for admittance to other more supportive environments (e.g., foster care, respite care, nursing homes, halfway house), particularly for those who need more intensive outpatient medical or mental healthcare. There are a number of transitional housing units in the community that offer or connect their residents to support programs, particularly those returning from mental health institutions. Caseworkers often help clients find housing if they are homeless and then provide regular home visits.

All of the following permanent supportive housing units require that residents have a disability (mental, physical, and developmental). Clay County HRA has a 24-unit permanent supportive housing building called Gateway Gardens and vouchers for private market units currently under lease in Moorhead for permanent supportive housing. Clay County HRA also is a project manager for a MN Department of Human Services grant that provides case management for those exiting institutions. In 2018, Churches United completed construction of 42 units of permanent supportive housing on a 10-acre parcel of land zoned for multi-use in Moorhead, MN for individuals and families who are determined eligible based on the Coordinated Assessment SPDAT tool. The units accommodate 17 singles in efficiencies and one-bedroom apartments, and 24 families in two, three, and four-bedroom apartments. Common areas include an indoor active play area, an adult exercise room, and a community/family room with a kitchen for classes, community meals, and activities. Support services include two full-time case managers (one from Churches United, and another from collaborating service providers such as Lakes and Prairies), a part-time nurse, and a youth worker.

Clay County Social Services coordinates and manages special service needs for persons with physical and mental disabilities, frail elderly, and persons with mental illness, including those returning from mental and physical health institutions. Several contracted agencies provide care attendants and support services. There are 113 licensed adult foster care sites in Moorhead for people with developmental disabilities, adults with mental illness, adults with chemical dependency, and elderly persons in Moorhead, and one residential facility for adults with mental illness. There are 69 Home and Community Based Services offering a community residential setting. There are 12 assisted living facilities in Moorhead that provide housing with customized living services for elderly and disabled who are at risk of nursing facility placement. Several other apartment complexes in Moorhead also provide assisted living services. There are two residential treatment facilities that provide housing for adults with chemical dependency issues and one residential facility for adults with mental illness. Other in-home services funded by Clay County include case management for several people with serious mental illness.

There are no housing units in Moorhead specifically designated to serve persons with HIV/AIDS and their families. However, agencies in the community may serve persons with AIDS within existing program offerings.

Discussion

City of Moorhead will continue its work with the CoC, be a part of the CARES system collaborative meetings where information and data are discussed in regards to homelessness in the City of Moorhead. Collaboration between all service providers in the City of Moorhead and making these services more accessible to the homeless population is key to the solutions to end homelessness in Moorhead. The City of Moorhead will continue its support of these agencies by being a collaborative partner and assist in the process to end homelessness.

DRAFT

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Barriers to affordable housing were determined through citizen participation, the Moorhead Community Survey, and consults with area agencies. Common barriers in Moorhead include:

- High rental rates
- Available units to match household size (Clay County HRA report 1-bedroom and 4-bedroom units are sought)
- Poor or no credit history
- Poor rental history
- Criminal background
- Tenant/landlord disputes and evictions

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

While striving to maintain neighborhood livability and safety, the City of Moorhead will continue to work on reducing barriers to affordable housing. Some of the ways the City has done this in the past and continues to do are listed below:

- Securing down payment and closing cost assistance programs for local lenders through state program financing
- Land contributions to Habitat for Humanity, Access of the Red River Valley, and Creative Care for Reaching Independence
- Investment partnerships in new and renovated rental and owner-occupied housing developments
- Subdivision provisions allowing modest lot sizes (40-foot width)
- Tax increment financing for affordable housing development

Moorhead's housing costs are modest in comparison to state and national costs; however, as in other communities, this does not mean housing is affordable to lower income households in this community. More affordable housing stock, both rental and ownership, is needed and must be encouraged through public and private partnerships. Given the age of Moorhead's housing stock, preservation activities must continue.

Land use controls as included within the Comprehensive Plan, Zoning Ordinance, and Subdivision Ordinance, do not contain regulations that constitute barriers to affordability. Fees are set at a level to cover the cost of providing oversight in the construction and improvement of quality housing units. Moorhead does not impose growth limits but manages growth to maximize the availability of public infrastructure.

Public infrastructure installation is a significant cost to the creation of new housing at all price levels, but Moorhead and other cities in the metropolitan area do share risk by financing infrastructure in the form of special assessments and amortize the costs over time.

Discussion:

The City of Moorhead supports affordable housing development efforts. Barriers to affordable housing are well understood, though difficult to address. The actions that are planned to address barriers are listed in this section. More affordable housing opportunities mean less people experiencing homelessness and ultimately, people's quality of life and feeling of safety are influenced by the creation of more affordable housing. Partnerships and strong relationships with local agencies and developers to build and promote affordable housing is a priority for Moorhead.

AP-85 Other Actions – 91.220(k)

Introduction:

This section summarizes actions planned to address obstacles to meet underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and to enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

The City of Moorhead will foster and support ongoing relationships with local service providers and area agencies as they are the primary solution to meeting underserved needs of Moorhead. Partnerships and collaboration will occur when necessary to meet the needs of the community.

Actions planned to foster and maintain affordable housing

The City of Moorhead will foster and maintain affordable housing by ongoing operation of the Home Rehabilitation Loan Program and by supporting ongoing relationships with agencies such as Habitat for Humanity, Access of the Red River Valley, Creative Care for Reaching Independence, Clay County HRA, MPHA, Cass Clay Community Land Trust, and Churches United for the Homeless as they move forward with their plans to add to the affordable housing stock in Moorhead. The CoC has provided various trainings on housing stability including housing case management, working with landlords, Housing First, Low Barrier, Harm Reduction, and Motivational Interviewing. The CoC works with MN Housing, supportive service partners and developers in creation of new MN Housing Super RFP projects.

Actions planned to reduce lead-based paint hazards

The City of Moorhead continues to implement HUD's Lead-Safe Housing regulations as established in 1999. All assisted tenants and owners living in pre-1978 construction housing units are notified of the dangers of lead-based paint and receive the required EPA brochures. Lead risk assessments are conducted on all pre-1978 construction housing units receiving assistance under CDBG rehabilitation programs. Lead-safe work practices are followed for lead-based paint removal and/or stabilization on all units in which lead-based paint is detected in accordance with EPA/HUD and Minnesota Department of Health. Approximately 6-10 homes are rehabilitated each year, and many have lead based paint; lead safe work practices are used during rehabilitation. Older housing units have been demolished over time, which also reduces the number of homes with lead-based paint and potential hazards. Taking precautions associated with lead safe work practices and understanding HUD's Lead-Safe Housing regulations reduce the chances for lead poisoning and hazards. These actions are written into the rehabilitation program guidelines and are referenced for other activities.

Actions planned to reduce the number of poverty-level families

The City of Moorhead will support business growth and related job opportunities, transportation programming, and affordable housing projects throughout Moorhead. The primary way to reduce the number of poverty-level families is to keep unemployment rates low if possible and provide more affordable housing and public transit designed for its users. Ongoing collaboration with local service providers and area agencies is also important due to the complexity of poverty and the level and variety of services that are offered by Moorhead's local service providers. The CoC also established an Employment & Income Committee to support supportive housing programs in achieving improve income outcomes.

Actions planned to develop institutional structure

The City of Moorhead Administration Department is the lead agency in implementation of the Consolidated Plan. Other departments within the City government implement CDBG activities, including Parks and Recreation and Metro Area Transit. Community partners directly funded through CDBG are Lakes and Prairies Community Action Partnership, the Afro-American Development Association and the Boys & Girls Club of the Red River Valley. However, numerous other community organizations, businesses, and churches are directly involved in addressing the housing and community development needs of Moorhead, particularly related to emergency shelter, homeless prevention services, affordable home production and lending, education, employment, health care, transportation, childcare, counseling, and social services.

The strength of the institutional structure overall is the wide variety of organizations and collaborative networks addressing housing and community development issues in Moorhead and the Fargo-Moorhead metropolitan community. Of particular strength is the communication between homeless services providers through an active Fargo-Moorhead Coalition to End Homelessness. Churches United for the Homeless, Moorhead's largest emergency shelter, is a partnership of 58 faith congregations that work together to address the needs of homeless persons.

The City of Moorhead works to achieve strengthened communication in other housing and community development activities through an asset building, solution-based Neighborhood Services Division, which crosses existing City departmental lines and increase outreach to private financial and business sectors, and communication with residents.

The Mayor and Moorhead City Council are responsible for appointments to the Moorhead Public Housing Agency Board of Directors and the employment of the Executive Director. MPHA services contracting, other employment decisions, and procurement are handled independently of the City of Moorhead. The City of Moorhead conducts environmental reviews for the MPHA.

The City of Moorhead will continue to communicate with MPHA, Clay County Housing and Redevelopment Authority, and other community organizations, sharing existing needs assessment data and working together to address emerging community needs and assets.

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

Ongoing relationships and partnerships where necessary.

Discussion:

All of the actions discussed in this section are described in detail the strategic plan section of this Consolidated Plan.

DRAFT

Program Specific Requirements

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

Introduction:

All estimated program income to be received before the start of the next program year has been programmed in 2024 and is required to be spent prior to entitlement funds. Moorhead has no section 108 loans, urban renewal settlements, or float funded activities. There are no urgent need activities in Moorhead.

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. | 100.00% |

The 2024 Action Plan is designated as year 5 of a 5-year overall benefit period.

DRAFT