

The CPMP 2014 Annual Action Plan includes the <u>SF 424</u> and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations.

Narrative Responses

GENERAL

GRANTEE: City of La Crosse

CON PLAN PERIOD: 2010 to 2014

Executive Summary (92.220(b))

2014 CDBG and HOME funds continue to be critical for the City and its residents. With an increase in foreclosures, the deterioration of the City's neighborhoods, and funding reductions for public services, the CDBG and HOME funding will revitalize La Crosse's neighborhoods, help families gain greater self-sufficiency, and alleviate poverty.

The Community Development Department will continue to take action to make its programs more effective and leverage additional resources through public-private partnerships. This year, for every \$1 spent in CDBG and HOME resources, the City and its partners will leverage an additional \$3.57 in other sources of funding.

In 2014 the City plans to move forward with its Replacement Housing Program, demolishing older and inadequate structures throughout the City and constructing quality affordable housing in its place. It will also begin the process of planning and implementing a new initiative to develop affordable, multi-family housing rental units- thus offering long-term, preventative solutions to homelessness in our area. The City will also partner with Habitat for Humanity, CouleeCap, and the La Crosse Housing Development Organization to develop some of the lots the city has acquired. It will also assist new neighborhood initiatives such as ReNEW La Crosse and the Neighborhood Development Corporation. Code enforcement will also be undertaken by CDBG this year as it has been identified as a top priority for providing suitable and healthy living conditions for underserved families.

Public services will also be essential in the 2014 Program Year with funding being provided for various programs ranging from health care, transitional housing, nutrition, youth and child activities.

The 2013 Program Year performance is a little behind due to the absence of key staff in 2012 and 2013 which continues to affect projects to date. However, staff is working hard to make all project performance goals on target.

Action Plan Required Elements:

Geographic Distribution/Allocation Priorities:

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year.

While La Crosse County's poverty rate is quite low (12.5%), its City has the second highest poverty rate in the state at 23% (US Census Bureau). In La Crosse's most troubled neighborhoods of Washburn, Powell-Poage-Hamilton, and the lower north-side, its poverty rates are even higher (see areas in red and orange below)---with 50 to 60% of families living in poverty (U.S. Census 2010). The areas circled below will be the City's area of geographic concentration.







Public Service activities, housing services and infrastructure projects will operate City-wide.

2. Describe the reasons for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

PY 2014 Action Plan Geographic Distribution/Allocation Priorities # 2 response:

Revitalization of low-moderate income areas within the City remains a top priority not only for public organizations but local citizens as well. For 2014 the City of La Crosse will continue to focus housing development and public service activities in the Powell-Hood-Hamilton, Washburn, and Northside neighborhoods.

While older housing is less expensive, they are more likely to have maintenance issues and many times, serious issues that are a danger to potential occupants. There are 2,920 renter families in La Crosse, who are experiencing a severe cost burden (where more than 50% of their income is paid for in rent) or are experiencing a lack of plumbing or kitchen facilities or overcrowding.

3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

PY 2014 Action Plan Geographic Distribution/Allocation Priorities # 3 response:

The City of La Crosse will begin a process to undergo a major multi-family, residential and mixed used project for low-income and homeless individuals. This will enable area non-profits to implement a housing first approach to resolving homelessness, as well as remove areas of blight in the city.

The City of La Crosse will hire two code enforcement officers dedicated solely to improving living conditions for low-income families in the geographic areas described above.

The City of La Crosse through its Housing Rehabilitation Program will make repairs to 15 families in the City of La Crosse who own home of a value over \$60,000 and whose repairs will substantially prolong the viability of the property. Additionally, Habitat for Humanity will be the lead agency on a collaboration between numerous organizations to make critical home repairs to low-income residents in the City's target neighborhoods.

The Replacement Housing Program (CDBG funds) will acquire and demolishes blighted properties. This year the program will acquire at least four blighted, dilapidated homes in 2014 in the Powell-Poage Hamilton or Washburn neighborhoods. These properties will then be torn down and then the City of La Crosse or its partners, Western Technical College, Habitat for Humanity, or the La Crosse Community Housing Development Organization will build a home for an income qualified family.

The Small Business Development Program will continue to provide loans to qualified applicants, in the form of Gap Financing, for the purpose of job creation/retention for LMI persons.

4. Identify the federal, state, and local resources the jurisdiction expects to receive to address the needs identified in the plan. (92.220(c)(1))

CDBG

	2014
Funding Source	Allocation
2014 CDBG Entitlement	
Grant (Estimate)	\$ 878,601.24
CDBG Unspent Previous	
Entitlement (Re-Allocated)	\$ 456,666.88
Revolving Loan Funds	\$ 1,100,000.00
TOTAL	\$2,435,268.12

HOME

	2014
	Allocation
HOME Funds (Estimate)	317,311.00
HOME PI (Estimate)	323,000.00
HOME Administration	31,731.10
TOTAL	349,042.10

PY 2014 <u>Action Plan Sources of Funds # 4 response:</u> Other funds anticipated in addition to CDBG and HOME Funds include SHP Funds for a 4 county Region. Section 8 funds are anticipated for 2014 through the City Public Housing Authority.

5. If you plan to dedicate funds within a local targeted area, provide the boundaries of the targeted area and an estimate of the percentage of funds you plan to dedicate to target area(s). (91.220(f))

PY 2014 <u>Action Plan Sources of Funds # 5 response:</u> Approximately 80% of the City's funds will be targeted in these areas.

6. If your plan includes a Neighborhood Revitalization Strategy Area or Areas, please identify the census tracts for each NRSA and an estimate of the percentage of funds you plan to dedicate to the NRSA(s).

PY 2014 Action Plan Sources of Funds # 6 response: N/A

7. Explain how federal funds will leverage resources from private and non-federal public sources.

PY 2014 <u>Action Plan Sources of Funds # 7 response</u>: In 2014, the City has allocated \$2.4 million in CDBG and HOME Funds and anticipates leveraging another \$8 million in other sources of funding.

PUBLICE SERVICES SPONSOR	CDBG Funds		tate, Local, ivate Funds	Ot	ther Federal Funds	OTAL (CDBG and OTHER FUNDS)
St. Clare Health Mission	\$	20,000.00	\$ 317,524.00			\$ 337,524.00
Municipal Transit Utility	\$	25,000.00	\$ 149,469.00			\$ 174,469.00
Boys & Girls Clubs	\$	25,000.00	\$ 321,260.00			\$ 346,260.00
The Hunger Task Force of La Crosse, Inc. Kane Street	\$	10,200.00	\$ 30,037.66			\$ 40,237.66
Independent Living Resources	\$	14,880.00	\$ 44,570.00			\$ 59,450.00
Family & Children's Center Stepping Stones	\$	10,000.00	\$ 9,905.60			\$ 19,905.60
Options Clinic	\$	15,750.00		\$	265,500.00	\$ 281,250.00
Couleecap, Inc. Supportive Housing	\$	25,000.00	\$ 145,573.00	\$	862,408.00	\$ 1,032,981.00
New Horizons Shelter and Outreach Centers	\$	25,000.00	\$ 152,997.00			\$ 177,997.00
Hillview Urban Agricultural Center	\$	17,000.00				\$ 17,000.00
The Salvation Army	\$	25,000.00				\$ 25,000.00
YWCA Ruth House	\$	12,000.00	\$ 15,261.00	\$	10,000.00	\$ 37,261.00
The Parenting Place Neighborhood Cafes	\$	11,128.00	\$ 44,570.00			\$ 55,698.00
La Crosse Area HMAA	\$	14,658.64	69761.0			\$ 84,419.64
<u>TOTAL</u>	\$	250,616.64	\$ 1,300,928	\$	1,137,908	\$ 2,689,452.90

Non-Public Services SPONSOR	Committee Approved Allocation		State, Local, Private Funds			TOTAL
Multi-Family Affordable						
Housing/Homelessness	\$	401,586	\$	1,204,756.95	\$	1,606,342.60
Poage Park Splash Park	\$	50,000.00	\$	450,000.00	\$	500,000.00
Code Enforcement	\$ 107,100.00				\$	107,100.00
City of La Crosse Housing						
Rehabilitation Program	\$ 500,000.00		\$	5,000.00	\$	505,000.00
City Replacement Housing						
(Acquisition, Demolition)	\$	283,465.83	\$	500,000	\$	783,465.83
Habitat for Humanity						
Housing Renew	\$	33,000	\$	18,840.00	\$	51,840.00
Small Business Development						
Revolving Loan	\$	500,000.00	\$	450,000	\$	950,000.00
CouleeCap Business and						
Income Development	\$	29,500.00	\$	8,362	\$	37,862.00
<u>TOTAL</u>	\$ 1	L,904,651.48	\$	2,636,958.95	\$	4,541,610.43

HOME Program	HOME Funds Allocation		State, Local, Private Funds			Other Federal Funds		TAL (CDBG and THER FUNDS)
La Crosse Community Housing Development Organization (HOME Funds)	\$	180,000.00	\$	224,800.00	\$	20,000.00	\$	424,800.00
City of La Crosse Replacement Housing HOME Funds (Construction)	\$	73,113.63	\$	850,000.00			\$	923,113.63
Multi-Family Affordable Housing/Homelessness	\$	64,197.37	\$	192,592.11			\$	256,789.48
<u>TOTAL</u>	\$	317,311.00	\$	1,267,392.11	\$	20,000.00	\$	1,604,703.11

8. Provide a description of how matching requirements of HUD's programs will be satisfied.

The City of La Crosse receives many services from other departments for which we are not charged and we use this for match dollars. For example, the City Streets Department will demolish dilapidated homes for our Replacement Housing Program with no charge, and the streets department manages all lawn care, snow removal, sidewalk repair and replacement needs for our properties, and the City Attorney's Department has provided legal counsel and preparation of necessary legal documents.

The La Crosse Community Housing Development Organization also anticipates matching funds from state down payment assistance, private lending, and other state and federal funding.

If the jurisdiction deems it appropriate, indicate publicly owned land or property located within the jurisdiction that may be used to carry out the plan.

PY 2014 <u>Action Plan Sources of Funds # 9 response:</u> The City may use City owned lots purchased without federal funds for Replacement Housing Project Homes.

Managing the Process

10.Identify the significant aspects of the process, by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

PY 2014 Action Plan Managing the Process # 10 response:

The lead agency for overseeing the development of the Action Plan is the City of La Crosse Planning and Development Department. The Planning and Development Department is responsible for delivery of housing programs, planning activities and program administration. The City Engineering and Public Works Departments deliver infrastructure projects. The City's Parks, Recreation and Forestry Department assist in identifying public park facilities that are improved with non public service funds. Public services are delivered by various non-profit organizations.

This year, the City of La Crosse significantly improved its evaluation and application process for CDBG Funds. It developed a new evaluation process and also provided a pre-application workshop to potential funding applicants.

On Wednesday, November 6th, from 9AM – 12PM, the City brought together over 40 different affordable housing stakeholders, homelessness advocates, citizens, council members, and builders to discuss issues facing the city of La Crosse. The group brainstormed ideas for a 10-year strategic plan and ideas for future projects. Out of this meeting came suggestions for formulating a multi-family affordable residential project that also would provide long-term supportive housing for the homeless.

From September 2013 through December 2013, the City Planning and Development Department solicited input from other City Departments, La Crosse County Human Services, non-profit service providers, housing providers, citizen advocates and the general public to identify needs in the community to amend the Consolidated Plan and develop the 2014 Action Plan. Some of the Participants were Couleecap, Inc., the Boy's and Girl's Club, the Salvation Army, Options Clinic and New Horizons Women's Outreach Center and private citizens. During the 2013 Program Year the jurisdiction included housing, health and social service agencies in the public hearings to identify needs and invited such entities to apply for funding to address identified needs.

11.Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

PY 2014 Action Plan Managing the Process # 11 response:

The RENEW Program brings together major organizations working on neighborhood revitalization to coordinate efforts in key neighborhoods. The City, Habitat, and CouleeCap will develop a joint application that will allow an individual to apply for multiple housing repair programs at once. They are also developing a joint marketing plan.

Additionally, there is now a new homelessness task force in La Crosse that is uniting and coordinating the efforts of the organizations who work on the Continuum of Care. The City will also take further efforts to coordinate its new homeownership opportunities with Habitat and Couleecap through frequent communication and leveraging resources.

Finally, the City evaluated its public service applications this year based on evidence that they were coordinating services, reducing duplication, and leveraging additional resources.

Citizen Participation (91.220(b))

12.Provide a description of the process used to allow citizens to review and submit comments on the proposed consolidated annual plan, including how the plan (or a summary of the plan) was published for review; the dates, times and locations of a public hearing, or hearings; when and how notice was provided to citizens of the hearing(s); the dates of the 30 day citizen comment period, and if technical assistance was provided to groups developing proposals for funding assistance under the consolidated plan and how this assistance was provided.

PY 2014 <u>Action Plan Citizen Participation # 12 response</u>: The Action Plan along with the 2014 Allocation Summaries were made available for review on the City's website and at the Planning Office. Comments were accepted for 30 days. A Public Hearing took place on March 6th and March 11th. Comments received at that meeting will be reviewed and action taken if appropriate.

13. Provide a summary of efforts made to broaden public participation in the development of the consolidated annual plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

PY 2014 <u>Action Plan Managing the Process # 13 response</u>: Outreach has been provided to the Hmong populations here in La Crosse. City staff has been working closely with leaders in the Hmong community to ensure that they are aware of all available resources in the community provided through CDBG and HOME funding. This year we had one application from a Hmong agency seeking CDBG funding; this is consistent with last year's funding cycle.

14.Provide a summary of citizen comments or views on the annual plan.

PY 2014 <u>Action Plan Managing the Process # 14 response:</u> None have been received as of this date. A public hearing will be held on March 6th and March 11th. Any comments received at that meeting will be reviewed and action taken if appropriate.

15.Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

PY 2014 <u>Action Plan Managing the Process # 15 response:</u> Comments will be evaluated if received at the public hearing on March 6th and March 11th, 2014.

Institutional Structure

16.Describe actions that will take place during the next year to develop institutional structure.

PY 2014 Action Plan Institutional Structure # 16 response:

The City continues to develop public partnerships and new public organizations to enhance its work. The City closely collaborates with La Crosse County and the UW Extension. Together, we have conducted research on neighborhood revitalization and examined how to address neighborhood challenges. The City now has formed a Neighborhood Revitalization Commission which examines legislation on these issues. The ReNEW Program currently coordinates efforts among the public and private sector to revitalize La Crosse's neighborhoods in the greatest need. The City is supporting an initiative to develop the City's first neighborhood development corporation. The City has also created the first Gunderson-City of La Crosse Neighborhood Development Corporation which will focus specifically a neighborhood revitalization in the Powell-Poage Hamilton Neighborhood.

The City will also emphasize partnerships with its area employers, businesses, and foundations including Western Technical College, Gundersen Lutheran, UW La Crosse, Franciscan-Skemp Mayo Clinic, 360 Real Eate, major realtors, and Kwik Trip.

The City is adopting changes to its staffing structure to allow for greater responsibility for formerly purely administrative positions and dedicate additional time to improving record-keeping and housing application intake. The City's Community Development Department has also applied for a VISTA Volunteer to support its CDBG Consolidated Planning Process this year.

Monitoring

17. Describe actions to be taken that will take place during the next year to monitor your performance in meeting goals and objectives set forth in your Consolidated Plan.

PY 2014 <u>Action Plan Monitoring # 17 response</u>: Periodic file reviews, quarterly report reviews, phone calls and IDIS updates will ensure that we are expending funds in a timely manner. Training, when offered, will be pursued to ensure staff is up to date on the most recent regulation changes.

18.Describe steps/actions to be taken during the next year to ensure compliance with program requirements, **including requirements involving the timeliness of expenditures.**

PY 2014 <u>Action Plan Monitoring # 18 response:</u> Staff will continue to read current CDBG/HOME updates so as to be up to date on items. Staff have made substantial amendments to previous years action plans to move funds from projects that are not moving forward into new programs. Staff is working with the Engineering Department to ensure timely expenditures of major public works programs. Close monitoring of the IDIS system and expenditures will continue along with contact with our HUD representative.

19.Describe steps/action you will use to ensure long-term compliance with housing codes, including actions or on-site inspections you plan to undertake during the program year.

PY 2014 <u>Action Plan Monitoring # 19 response:</u> The City's Housing Rehabilitation Program staff undergoes CODE training to ensure that they are up on the most current codes. Housing Rehab homes are all required to meet code upon completion. The City's Building and Inspection Department inspect City homes in the same manner as private construction. Housing Rehabilitation program staff confers with City Building and Inspection continually as questions come up.

20.Describe actions to be taken to monitor subrecipients (including sponsors or administering agents) during the next program year. This includes the monitoring of all programs, CDBG, HOME, ESG, or HOPWA, as applicable.

PY 2014 Action Plan Monitoring # 20 response:

The City has developed a risk assessment tool to determine which sub-recipients to monitor. Already, the City has conducted two on-site monitoring visits, and three more will be undertaken. The IDIS System is also an excellent tool to alert staff of projects that have fallen behind.

Annual submittal of financial audits, quarterly reports, on-site visits of a percentage of subrecipients.

Description of Activities

21. The action plan must provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan.

2014 FUNDING AWARDS, SUMMARIES, OBJECTIVES, OUTCOMES

HUD Objective: Create Suitable Living Environments.

Outcome: Increase availability and accessibility of suitable living environments.

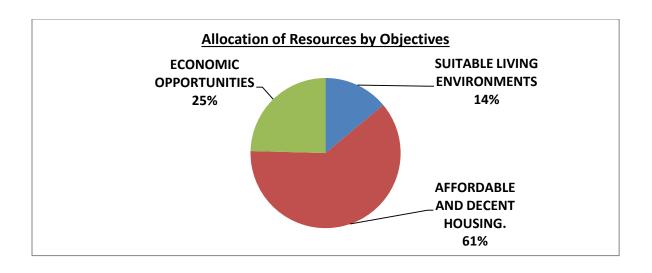
PUBLICE SERVICES SPONSOR	CDBG EN Allocation	Priority Need Category	Output. Number of persons served (with new/continuing access to benefit).
St. Clare Health Mission	\$ 20,000.00	Health Services	719
Municipal Transit Utility	\$ 25,000.00	Transportation	4172
Boys & Girls Clubs	\$ 25,000.00	Youth Services	785
The Hunger Task Force of La Crosse, Inc. Kane Street	\$ 10,200.00	Other (Food Services)	950
Independent Living Resources	\$ 14,880.00	Handicapped Services	250
Family & Children's Center Stepping Stones	\$ 10,000.00	Youth Services	345
Options Clinic	\$ 15,750.00	Health Services	1000
Couleecap, Inc. Supportive Housing	\$ 25,000.00	Homeless	68
New Horizons Shelter and Outreach Centers	\$ 25,000.00	Domestic Violence	280
Hillview Urban Agricultural Center	\$ 17,000.00	Other (Food Services)	1200
The Salvation Army	\$ 25,000.00	Homeless	800
YWCA Ruth House	\$ 12,000.00	Homeless	35
The Parenting Place Neighborhood Cafes	\$ 11,128.00	Child Care	28
La Crosse Area Hmong Mutual Assistance Association	\$ 14,658.64	Elderly Services	33
Poage Park Splash Park (Non- Public Services)	\$ 50,000.00	Parks	N/A (Census Tracts)

HUD Objective: Provide decent affordable housing.

Outcome: Increase availability and accessibility of decent housing.

NON-PUBLIC SERVICES	CDBG EN Allocation		Priority Need Category	Output. Number of housing units.
City of La Crosse Multi-Family				
Affordable				
Housing/Homelessness	\$ 401,586		Low-Income Renters	24
Code Enforcement Officers				
(City Building and Inspections				
Department)	\$ 107,100.00		Code Enforcement	1000
City of La Crosse Housing	\$ 500,000.00		Low-Income	
Rehabilitation Program	(Re	evolving Loan)	Homeowners	15
	\$	283,465.83		
City Replacement Housing	(Of to	otal, \$150,000	Low-Income	
(Acquisition, Demolition)	Prog	ram Income)	Homeowners	4
Habitat for Humanity Housing			Low-Income Owner-	
Renew	\$	33,000	Occupied Homes	21

NON-PUBLIC SERVICES	CDBG EN Allocation		Priority Need Category	Output. No. of jobs created.	Output. No. of persons assisted.
Small Business Development			Job		
Revolving Loan	\$	500,000	Creation	10	10
CouleeCap Business and			Micro-		
Income Development	\$	29,500	Enterprise	3	13
<u>TOTAL</u>	\$	529,500			



HOME Program	ME Funds location	Priority Need Category	Output. No. of housing units.	Output. No. of persons assisted.
La Crosse Community Housing Development Organization		Low-Income Owner-		
(HOME Funds)	\$ 180,000	Occupied Homes	2	13
City of La Crosse Replacement Housing HOME Funds		Low-Income Owner-		
(Construction)	\$ 73,113.63	Occupied Homes	3	10
Multi-Family Affordable				
Housing/Homelessness	\$ 64,197.37	Low-Income Renters	24	48
<u>TOTAL</u>	\$			
	317,311.00		29	81

Summary of Specific Annual Objectives and Outcome Measures

22.Describe the Federal Resources, and private and non-Federal public resources expected to be available to address priority needs and specific objectives during the program year. (See chart above and leveraging table.)

Both the CDBG and HOME funds will be used for activities, the City also provides match for services performed by other City Departments, such as the Streets Department, the Building and Inspection Department and the Legal Department.

HOUSING

Annual Affordable Housing Goals (91.220(g))

CITY OF LA CROSSE 2014 Action Plan

23.Describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction.

TABLE 3B ANNUAL HOUSING COMPLETION GOALS								
ANNUAL AFFORDABLE RENTAL	Annual Expected	Resources used during the period						
HOUSING GOALS (SEC. 215)	Number Completed	CDBG	номе	ESG	HOPWA			
Acquisition of existing units		Г						
Production of new units	24	V	V					
Rehabilitation of existing units								
Rental Assistance	41	V	<u>\</u>		<u> </u>			
Total Sec. 215 Rental Goals	65	V	V	Г				
ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC. 215)								
Acquisition of existing units	5	V	V					
Production of new units	9	Г	V					
Rehabilitation of existing units	36	V	Г					
Homebuyer Assistance								
Total Sec. 215 Owner Goals	50	V	V	V	V			
ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)								
Homeless	1183	V	V	V	<u>v</u>			
Non-Homeless		V	V	V	<u>\</u>			
Special Needs	250	V	V	V	<u>v</u>			
Total Sec. 215 Affordable Housing	1433	Г	Г	Г				
ANNUAL HOUSING GOALS								
Annual Rental Housing Goal	65	V	V	_	<u><</u>			
Annual Owner Housing Goal	50	V	V	L				
Total Annual Housing Goal	115		Г	Г	Г			

Needs of Public Housing (92.220(b))

24.Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

PY 2014 Action Plan Needs of Public Housing # 24 response:

The jurisdiction has adopted by reference the La Crosse Housing Authority Five Year Consolidated Plan and has placed a high priority on public housing needs.

25.If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

PY 2014 <u>Action Plan Needs of Public Housing # 25 response:</u> The Public Housing Agency is not troubled.

Antipoverty Strategy

26.Briefly describe the actions that will take place during the next year to reduce the number of poverty level families (as defined by the Office of Management and Budget and revised annually), taking into consideration factors over which the jurisdiction has control.

PY 2014 Action Plan Antipoverty Strategy # 26 response:

For 2014, numerous programs will be funded that assist families in overcoming poverty. The City of La Crosse's Replacement Housing Program, the La Crosse Community Development Housing Organization, and Habitat for Humanity will all provide housing opportunities for families that they would otherwise not have. These programs will allow families to build equity in their homes, while reducing the rent burden.

The Small Business Development programs operated by CouleeCap and the City of La Crosse will assist both individuals in obtaining employment and businesses in creating jobs for low-income persons.

The City of La Crosse also supports numerous agencies which assist individuals with coming out of homelessness and gaining self-sufficiency. In addition, community gardens, youth services, and health services all aid families in coming out of poverty.

Barriers to Affordable Housing

27.Describe the actions that will take place during the next year to remove barriers to affordable housing.

PY 2014 Action Plan Barriers to Affordable Housing # 27 response:

Additionally, Independent Living Resources and Couleecap's SLP Program will assist persons with disabilities in finding and maintaining housing. The EOC and the Fair Housing Partnership also provide training and maintain data resources for persons who need assitance when dealing with Barriers to Affordable Housing. Homebuyer courses are also a requirement of this program which provides the homeowners with information to ensure that they are successful homeowners.

One barrier to housing that was identified by the *Impediments to Fair Housing Report* was that La Crosse has not undertaken enough efforts to support affordable *rental housing units*, particularly which can serve the lowest-income individuals. This year, the City will take steps to develop the first affordable multi-family rental unit.

Another barrier that was identified was that the public housing authority has not been a strong partner in addressing chronic homelessness issues. The City is working with the public housing authority to see how it might collaborate to address some of these needs.

28.Describe the actions that will take place during the next year to foster and maintain affordable housing.

PY 2014 Action Plan Barriers to Affordable Housing # 28 response:

The City will continue to operate its Replacement Housing Program and this year, provide additional funding for Habitat for Humanity, Coulee Cap, and the La Crosse Community Housing Development Organization to operate additional low-income homeowner programs. These programs will assist LMI households in becoming first-time homebuyers by providing down-payment assistance. As part of the City and County collaboration on identifying housing needs additional sources of money will be made available in the future some of this will be targeted to improving housing in the City's most housing depressed areas.

Lead-based Paint

29.Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

PY 2014 Action Plan Lead-based Paint # 31 response:

Three activities funded in 2014 will deal with existing housing units. The Housing Rehabilitation and the ReNew La Crosse Initiative offers funding for rehabilitation work that will result in lead-based hazards being removed from housing units. This program is not a lead-abatement program. However, where appropriate, all work

will be undertaken in a lead-safe manner. The jurisdiction is not participating in the lead-safe housing program.

The Replacement Housing Program removes substandard housing that usually contains lead-based paint problems. The Single-Family Housing Development then constructs new owner-occupied housing which is lead free, as would be expected from new construction. Subsequently, the inventory of lead-safe housing will be increased by at least two units in 2014.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

- **30.** Please describe, briefly, the jurisdiction's plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2014. Again, please identify barriers to achieving this.
 - Independent Living Resources (ILR) will operate the Housing Resource Center. ILR will provide assistance to homeless persons or persons at risk of being homeless.
 - The Salvation Army Emergency shelter will provide emergency services to the homeless.
 - Additionally, studies show there is a strong correlation between homelessness and domestic violence victims. This year, the City of La Crosse's will help New Horizons shelter provided emergency shelter to homeless women.
 - The YWCA Ruth House will help women transition into a drug-free independent lifestyle by providing them transitional housing services.
 - Couleecap will operate the Transitional Housing Services Program which will provde case management for homeless persons. Services included transportation, security deposits, life skills training, employment training and housing counseling.

A barrier to ending homelessness is a lack of available public resources to address this issue. However, this year the City of La Crosse has committed \$500,000 toward developing long-term housing units aimed at ending homelessness.

31.Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

PY 2014 Action Plan Specific Homeless Prevention # 31 response:

The City is developing long-term housing units which will aim at preventing families from becoming homeless. In addition, Couleecap, Ruth House, and New Horizons all operate housing units aimed at helping individuals and families with children from becoming homeless.

32.Discharge Coordination Policy—The jurisdiction must certify it established a policy for discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care, or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. (91.225 (c)(10))

PY 2014 <u>Action Plan Specific Homeless Prevention # 32 response:</u> Emergency Shelters are contacted when a person is discharged without any other residence to go to.

Emergency Shelter Grants (ESG) N/A

33.If applicable, describe how the ESG matching requirements will be met. **N/A**

PY 2014 Action Plan ESG # 33 response:

34.(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

PY 2014 Action Plan ESG # 34 response:

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

35. Please describe any supportive housing activities being undertaken to address the priority housing needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with alcohol or other substance abuse problems).

PY 2014 Action Plan Non-homeless Special Needs # 35 response:

Independent Living Resources assists disabled individuals in locating housing opportunities. The City of La Crosse, Habitat for Humanity, and CouleeCap all assist families with special needs in creating a suitable and accessible housing unit for their needs.

COMMUNITY DEVELOPMENT

Community Development Block Grant

36.Identify the estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income (an amount generally not to exceed ten percent of the total available CDBG funds may be excluded from the funds for which eligible activities are described if it has been identified as a contingency for cost overruns.)

PY 2014 <u>Action Plan Community Development # 36 response</u>: It is anticipated that approximately 90% of CDBG funding will be used for LMI benefit.

- 37.CDBG resources must include the following in addition to the annual grant:
 - a. Program income expected to be received during the program year, including:
 - i. The amount expected to be generated by and deposited to revolving loan funds;

PY 2014 <u>Community Development # 37 a.i. response:</u> We anticipate Program Income in the following Manner:

Small Business Development Loan: \$300,000 CDBG

Housing Rehabilitation: \$400,000 CDBG

Single Family Housing Development: \$50,000 CDBG

Total: \$750,000

All of the above are revolving loan programs.

ii. The total amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.

PY 2014 Community Development # 37 a.ii. response: N/A

b. Program income received in the preceding program year that has not been included in a statement or plan;

PY 2014 Community Development # 37 b. response: N/A

c. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives in its strategic plan;

PY 2014 Community Development # 37 c. response: N/A

d. Surplus funds from any urban renewal settlement for community development and housing activities; and

PY 2014 Community Development # 37 d. response: N/A

e. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

PY 2014 Community Development # 39 e. response: N/A

- 38. X NA If a jurisdiction intends to carry out a new CDBG float-funded activity, the jurisdiction's plan must include the following information:
 - a. For the program income included in 1(b) above, the jurisdiction should identify the month(s) and year(s) in which the program income will be received; and which of the following options it will take for each float-funded activity to address the risk that the activity may fail to generate adequate program income:
 - i. amend or delete activities in the amount equal to any amount due from default or failure to produce sufficient income in a timely manner. (If this option is chosen, the action plan must include a description of the process it will use to select activities to be amended or deleted and how it will involve citizens in that process), OR
 - ii. obtain an irrevocable line of credit from a commercial lender for the full amount of the float-funded activity. (If this option is chosen, information on the float-funded activity in the action plan must include the lender and the terms of the irrevocable line of credit), OR
 - iii. agree to transfer general local government funds to the CDBG line of credit in the full amount of any default or shortfall within 30 days of the float-funded activity's failure to generate projected program income on schedule.

PY 2014 Community Development # #38 response: N/A

- **39.**Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs, public facilities, public improvements, public services and economic development. (Use of Table 2B or the Community Development Needs Table is sufficient, additional narrative is not required) See table 2b
 - a. For activity for which the jurisdiction has not yet decided on a specific location, such as when a jurisdiction is allocating an amount of funds to be used for making loans or grants to businesses or for residential rehabilitation, provide a description of who may apply for the assistance, the process by which the grantee expects to select who will receive the assistance (including selection criteria), and how much and under what terms the assistance will be provided.

PY 2014 Community Development # 39 a. response: Activity:

The Small Business Development Loan (SBDL) program is not area specific, but instead is open to all eligible persons interested in starting a new business or in expanding an existing business. Eligibility is rigorously determined through their business plan, financial portfolio, credit history and ultimately by the SBDL Loan Committee. Anyone may apply for this program as long as the activity is eligible and they meet the job creation requirements.

Activity: Housing Rehabilitation Program: This program is available City-wide to any homeowner whose household income is at or below 80% of the CMI.

40.An "urgent need" activity may be included in the action plan only if the jurisdiction certifies that the activity is designed to meet other community development needs having a particular urgency because existing conditions pose a serious and imminent threat to the health or welfare of the community and other financial resources are not available.

PY <u>Community Development # 40 response: N/A</u>

HOME/ American Dream Down payment Initiative (ADDI)

41.Describe other forms of investment not described in § 92.205(b).

PY 2014 Action Plan HOME/ADDI # 41 response: N/A

42. Describe how HOME matching requirements will be satisfied?

PY 2014 <u>Action Plan HOME/ADDI # 42 response:</u> The City has surplus HOME matching dollars from previous years and continues to accrue matching dollars though in-kind services provided by numerous other City Departments.

43.If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

PY 2014 Action Plan HOME/ADDI # 43 response:

The La Crosse HOME Program/CHDO Loan Payment Repayment Agreement signed at closing will indicate which provision will apply to each property. The Agreement enforces the resale or recapture obligation through a lien, deed restriction, or covenant running with the land. Most of the City's homes will use the resale provision (although not always) and most of the CHDO's homes will use the recapture provision.

Recapture provisions must recoup the HOME investment from available net proceeds obtained from the sale of a house. The aim is to assist other HOME-eligible families.

Resale provisions must limit any subsequent purchase of a HOME-assisted property to income-eligible families, provide the owner with a fair return on investment, and ensure that the house will remain affordable to a reasonable range of low income homebuyers.

The Declaration of Restrictive Covenants (Deed Restrictions) requires that units utilizing HOME funds meet the affordability requirements of the HOME program at 24 CFR 92.254 for homeowner housing and 24 CFR 92.252 for rental housing. Repayment of funds will be required if the housing does not meet the affordability period requirements for the specified time period, commencing on the date of completion of construction or rehabilitation and submission of a project completion report to the CITY. To ensure affordability, recapture or resale restrictions will be triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability. A copy of the recorded deed restrictions must be given to the City.

- 1. In the event that the property is sold during the 15 year affordability period, the following recapture conditions will be met:
- a. Under the recapture option, the period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit.
- b. The CHDO and/or PJ will recapture the full amount of the HOME direct subsidy out of the net proceeds of the sale of the property. The net proceeds mean the sale price minus non-HOME loan repayment and closing costs.
- c. If there are no net proceeds or insufficient proceeds to recapture the full amount of HOME investment due, the amount subject to recapture must be limited to what is available from net proceeds.
- d. If the net proceeds are not sufficient to recapture the full amount of HOME investment plus enable the homeowner to recover the amount of the homeowner's down payment and any capital improvements made to the property during the period of occupancy, the homeowner's investment will be repaid in full before any HOME funds are recaptured.
- e. If no direct subsidy is provided to the homebuyer to allow for the purchase of the unit, then the resale provisions must be imposed.
- 2. A resale provision must be used for projects that involve HOME assistance paid to the CHDO as owner/developer, but with no additional assistance to the buyer, meaning no direct subsidy was provided to the homebuyer that enabled the homebuyer to purchase the unit. This is because there are no funds that are subject to recapture.
- a. Under the resale provision, the affordability period is based on the total amount of HOME funds used to assist the property and the buyer.
- b. In the event that the resale provisions will be used, the CHDO must inform the homebuyer prior to the closing of the sale of the property and incorporate the resale provisions provided in Attachment B in the written agreements with the homebuyer.

A resale provision must be used for projects that involve HOME assistance paid to the CHDO as owner/developer, but with no additional assistance to the buyer. This is because there are no funds that are subject to recapture. In the event that there is no direct subsidy to recapture, the HOME resale provisions will be imposed prior to the sale of the property to the homebuyer. The affordability period will be based on the total amount of HOME funds used to assist the property and the buyer. The homebuyer must sell to another Low-Income homebuyer (as defined by HUD), with the new home being affordable to the new buyer. The new homebuyer may not pay more than 33 percent of gross income for Principal, Interest, Taxes and Insurance (PITI).

In certain circumstances, the CITY may permit a new homebuyer to assume the CHDO loan and affordability restrictions, i.e., the CITY will not require the full repayment of the initial HOME subsidy. The HOME subsidy would be transferred to the new buyer and the remaining affordability period will remain with the property unless additional HOME assistance is provided to the new buyer.

As required under the HUD regulations, the homebuyer for whom a resale restriction is enforced will be allowed a fair return when selling to another income eligible buyer. The seller (i.e., the original buyer) will be allowed to retain their original investment in the property (i.e., down payment) plus the cost of any improvements made to the property.

During the period of affordability, the last recorded purchase price will generally be the minimum restricted price at the time of resale. Neither the minimum nor the maximum restricted resale price is guaranteed to the owner. If the restricted price exceeds the actual market value, the owner may have to accept the lower price. HOME-assisted units must be maintained in good condition in order to receive the maximum restricted price.

Recording the Resale Policy – The CITY's Resale Policy shall be included in the written HOME Agreement with the buyer. The Resale Agreement must be recorded via a deed restriction or land covenant.

Foreclosure and Resale – Foreclosure also triggers Resale provisions. Under a foreclosure scenario the CHDO must ensure the house is sold to another low-income buyer, as defined by HUD, at an affordable price. The CITY has a right of first refusal under a foreclosure scenario and reserves the right to purchase the property prior to or at foreclosure sale.

44.Describe the policy and procedures the PJ will follow to affirmatively market housing containing five or more HOME-assisted units.

PY 2014 <u>Action Plan HOME/ADDI # 44 response</u>: We will not have any projects of that size completed this year.

- **45.**Describe actions to be taken to establish and oversee a minority outreach program within the jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking, underwriters, accountants, and providers of legal services, in all contracts, entered into by the PJ with such persons or entities, public and private, in order to facilitate the activities of the PJ to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.
- PY 2014 <u>Action Plan HOME/ADDI # 45 response:</u> When a minority family is working with us on a homebuyer project, we will provide a translator if required and encourage the household to use any institution (financial or other) that they feel comfortable with. The City uses its public website to make available materials including, but not limited to bid documents provisions and advertisements.
- **46.** X NA If you intend to use HOME funds for Tenant-Based Rental Assistance, describe the local market conditions that led to the use of the HOME funds for a tenant-based rental assistance program.
- **47.**X NA If the TBRA program will target or provide preference for a special needs group, identify that group from the Consolidated Plan as having an unmet need and show that the preference is needed to narrow the gap in benefits and services received by that population?
- **48.**X NA If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.

- e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
- f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
- **49.** X NA If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Housing Opportunities for People with AIDS $X \square NA$

*If not using the CPMP Tool: Complete and submit Table 1B.

- **50.**Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
- **51.**Specify the one-year goals for the number of low-income households to be provided affordable housing using HOPWA funds for short-term rent, mortgage, and utility payments to prevent homelessness; tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.
- **52.**Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
- **53.**Identify the method for selecting project sponsors (including providing full access to grassroots, faith-based and other community organizations).
- **54.**Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Other Narrative

^{*}If using the CPMP Tool: Complete and submit Needs Table/HOPWA.

Include any Action Plan information that was not covered by a narrative in any other section.