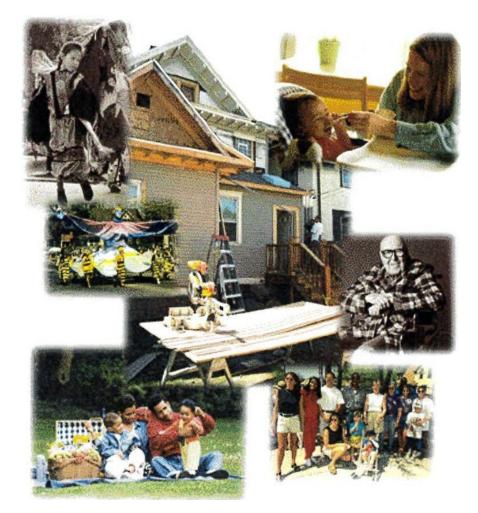
The City of Plymouth HENNEPIN COUNTY CONSORTIUM ANNUAL ACTION PLAN FY 2024





Annual Action Plan 2024

Executive Summary

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

1. Introduction

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

2. Summarize the objectives and outcomes identified in the Plan

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

The City of Plymouth will carry out activities that will provide for the preservation of the City's housing stock. Promote the development and preservation of a supply of quality housing that is affordable, provide essential social services like tenant protections, assist our aging population with home service, provide tenant protections, and support fair housing activities.

The city's CDBG funds will be used to support its existing housing programs, such as First Time Homebuyer Program, the Owner-Occupied Home Rehabilitation Program which provides 0% interest deferred loans, and the emergency repair grant program to assist low/moderate income homeowners with emergency repairs. In this way, the city is ensuring that all housing and neighborhoods in Plymouth are well maintained. The city encourages property improvements that will increase property values while protecting vulnerable and lower-income residents by ensuring that the improvement is protecting the health, safety, and livability of the City's older properties.

The City will also provide capital funding to assist with the improvement of residential public facilities for disabled individuals. To help Plymouth residents save energy, Plymouth is a partner city in the Home Energy Squad program. The Housing and Redevelopment Authority (HRA) has partnered up with the Center for Energy and Environment to subsidize the cost of the energy audits.

The City partners with Homes Within Reach to create and preserve affordable homeownership for families earning less than 80% AMI become homeowners by acquiring, remodeling, and selling the properties for inclusion in a community land trust.

3. Evaluation of past performance

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

The City of Plymouth has a long history of actively working to preserve and upgrade the condition of its housing, maintain housing affordability, and provide needed social services. The CDBG-funded single-family rehabilitation loan program (including lead-based paint abatement) and first-time homebuyer loan program have been a successful and important part of these efforts. Each year the City evaluates its performance relative to its Consolidated Plan goals through the Consolidated Annual Performance Evaluation Report (CAPER). The city continues to make progress toward meeting all its Consolidated Plan goals for the period from 2020-2024.

Fair Housing continues to be a focus of the City of Plymouth. In CDBG program year 2024, the Fair Housing Implementation Council expects to fund three fair housing activities guided by the Analysis of Impediments to Fair Housing. Activities from HOME Line, Affordable Housing Connections, and the Minnesota Homeownership Center will be available to City of Plymouth beneficiaries.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

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

In addition to public hearings conducted by the County Board, the City of Plymouth Housing and Redevelopment Authority (HRA) will hold a public hearing to receive comments regarding the annual projects and activities to be funded. The public hearing will be held on March 28, 2024, and asked the public to comment on the proposed activities. Notice of the public hearing was published in the official local newspaper on March 7, 2024, and on the City's website which offers translation services to the four most commonly spoken languages in the City- Hmong, Somali, Russian, and Spanish. The City of Plymouth holds these public hearings at times and locations convenient to potential and actual beneficiaries.

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

5. Summary of public comments

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

The city did hold a 30-day public comment period. The notice of public comment period and the Action Plan draft was published in the official local newspaper. The City held a public hearing on March 28, 2024, at the Housing and Redevelopment Authority meeting. No written comments were received during the public notice comment period.

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

No comments were received or rejected by the City of Plymouth during the public comment period nor during the public hearing held on March 28, 2024.

7. Summary

The City of Plymouth will follow regulatory requirements as outlined in 24 CFR 91.105 Citizen Participation Plan to encourage participation from its citizens. The Public Comment Period and the Public Hearing Notice will be initiated by posting notification in the local newspaper, on the city website, and by placing physical copies of the Annual Action Plan at the local Public Library, Plymouth Community Center, and City Hall.

Plymouth will carry out activities that will provide for the preservation of the City's housing stock, improve housing affordability, provide essential social services, and support fair housing activities. The city will continue to provide 0% interest deferred loans for housing rehabilitation and first-time homebuyers city-wide. The City will also provide capital funding to assist with the improvement of residential public facilities for disabled individuals and with the acquisition of property for inclusion in a

community land trust. Lastly, the City will provide CDBG funds to support social services and fair housing implementation.

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

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

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

| Agency Role | Name | Department/Agency |
|--------------------|----------|-------------------------|
| | | |
| CDBG Administrator | PLYMOUTH | Housing & Redevelopment |
| | | Authority |

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

City of Plymouth Housing & Redevelopment Authority Attn: Grant Fernelius, Executive Director

Phone: 763-509-5056; Email: gfernelius@plymouthmn.gov 3400 Plymouth Boulevard

Plymouth, MN 55447

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

1. Introduction

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

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

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)).

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

The City of Plymouth HRA also works to connect residents who may have housing issues and need advocacy or legal advice, with tenant advocacy groups such as HOME Line and Housing Link to help assist with finding housing that can accommodate the needs of residents.

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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 Minneapolis/Hennepin County Continuum of Care (CoC) & Hennepin's Housing Stability department convene CoC members around specific target populations and intervention types (shelter providers, homeless prevention providers, outreach etc.) in order to coordinate and develop new collective strategies to make homelessness rare, brief and non-recurring. The CoC's Lived Experience Advisory Group (LEAG) and Youth Action Board (YAB) bring together people with lived experience of homelessness to weigh in on strategies. The CoC's Executive Committee supports these strategies, and the Funding Committee evaluates existing and proposed projects for service and reallocates funds to meet emerging needs. Both LEAG and YAB participate in funding decisions relating to Federal, State and County funds and hiring decisions within Hennepin County's Housing Stability Area.

All homeless designated housing programs that receive public funding are required to fill all vacancies through the Coordinated Entry System (CES). This allows for an equitable system-wide assessment and prioritization of people most in need of each housing type. The CES system prioritizes veterans, chronically homeless persons and families, people with disabilities and those who have the longest histories of homelessness and medical fragilities. The process also assesses household preferences, including preferences for culturally specific services, to support the best match between person and program.

Hennepin County has very few homeless families that meet the HUD definition of chronic homelessness due to a shelter-all policy for families and access to rapid rehousing and permanent supportive housing through CES. The County reduced family homelessness by 42% from 2014 to 2020 as reflected in the Point-In Time count (from 2,088 to 1,220 people in families). During the pandemic, the demand for family shelter dropped again resulting in a 2022 count of 940 people in families. This rose significantly in the 2023 count as shelter demand surged coming out of the state and federal eviction moratoria, as Federal Emergency Rental Assistance programs wound down and as an increasing number of families newly arrived to Minnesota lacking the supports and infrastructure to move quickly into stable housing. These factors resulted in a 79% increase (to 1,686 people in families) with a further increase anticipated in the 2024 count. Hennepin County has expanded family shelter capacity, created a new team of housing focused case workers for families and invested in a 'surge' of additional rapid rehousing in response to these pressures.

For single adults, Housing Stability has developed a by-name list of those who meet requirements of chronic homeless status. This approach dramatically accelerated housing outcomes. While 76 chronically homeless individuals were housed in the entirety of 2018, the most recent 100 chronically homeless individuals were housed in less than a hundred days.. Since June 2017, when this approach began, over Annual Action Plan

2024

1,600 chronically homeless people – with an average experience of four years homelessness each – were housed with a 93% retention rate. Hennepin County has been selected to participate in the Big City Last Mile project with Community Solutions Built for Zero, recognizing and amplifying local progress in addressing chronic homelessness (https://community.solutions/case-studies/minneapolis-hennepin-county-achieves-30-reduction-in-chronichomelessness-by-improving-their-system/).

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

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

Hennepin County HHS' Housing Stability Department is the Collaborative Applicant for the Minneapolis/Hennepin County Continuum of Care (Coe). The Continuum of Care Coordinator and Coe planning staff work with Hennepin County ESG staff to comply with the Coe regulations outlined in

578.7 & 578.95 by: 1) Establishing a CoC Governing board with both Hennepin Coe and ESG staff included in the membership. 2) Conduct an annual Needs & Gaps Analysis to establish priority populations and needs based on data to inform funding decisions. 3) Establish COE written Standards for providing CoC assistance. 4) Designate and Operate an HMIS system. 5) Established working

committees that focus on all 6 components of our homeless response system to ensure alignment across CoC and ESG resources for each. In addition, Hennepin County has research staff dedicated to monitoring homelessness trends and outcomes.

ESG funds are awarded based on a request-for-proposal process that is combined with other homeless assistance funds to maximize coordination and results. Coe Committee members regularly sit on funding approval committees for ESG and other funds. On behalf of this jurisdiction, Coe funds the administration and works closely with the HMIS system administrator to implement HMIS data standards. The COE and ESG jurisdictions contribute to our statewide HMIS system with a 2% contribution to assist with HMIS Data Standards compliance for CoC and ESG-funded projects. The Coe holds an annual meeting to solicit feedback from community members, providers, and policymakers on the gaps and challenges facing the community and hosts extensive focus groups and community conversations with people who are experiencing homelessness.

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

| Table 2 – Agencies, groups | , organizations who participated |
|----------------------------|----------------------------------|
|----------------------------|----------------------------------|

| 1 | Agency/Group/Organization | HOME Line |
|---|--|---|
| | Agency/Group/Organization Type | Housing |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment 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? | HOME Line was consulted through Hennepin County's Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for legal advocacy services for low- and moderate-income tenant households in Plymouth and suburban Hennepin County. See narrative in AP-85. |
| 2 | Agency/Group/Organization | PRISM |
| | Agency/Group/Organization Type | Housing |
| | 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? | PRISM was consulted through the Hennepin County Consortium Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for emergency housing assistance and homelessness prevention services for low/moderate income households in Plymouth and suburban Hennepin County. See narrative in AP-85. |
| 3 | Agency/Group/Organization | Lutheran Social Services - St. Cloud |
| | Agency/Group/Organization Type | Housing |
| | 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? | Lutheran Social Services was consulted through the Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for housing counseling for low/moderate income households in Plymouth and suburban Hennepin County. See narrative in AP-85. |
|---|--|---|
| 4 | Agency/Group/Organization | Hammer Residences |
| | Agency/Group/Organization Type | Housing Services-Persons with Disabilities |
| | 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? | Hammer Residences was consulted through the Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for rehabilitated rental housing for low/moderate income households with development disabilities in Plymouth and suburban Hennepin County. See narrative in AP-85. |
| 5 | Agency/Group/Organization | INTERFAITH OUTREACH COMMUNITY PARTNERS |
| | Agency/Group/Organization Type | Services - Housing Services-homeless 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? | Interfaith Outreach was consulted through the Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for homelessness assistance for low/moderate income households in Plymouth and suburban Hennepin County. See AP-85 narrative. |
|---|--|---|
| 6 | Agency/Group/Organization | WEST HENNEPIN AFFORDABLE HOUSING LAND TRUST |
| | Agency/Group/Organization Type | Housing |
| | 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? | West Hennepin Affordable Housing Land Trust was consulted through the Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed a need for additional affordable housing options for low- and moderate-income households in Plymouth and suburban Hennepin County. See AP-85 narrative. |
| 7 | Agency/Group/Organization | Senior Community Services (SCS) |
| | Agency/Group/Organization Type | Services - Housing Services-Elderly Persons |
| | 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? | SCS was consulted through the Hennepin County Consolidated Plan process and the city's annual non-profit funding review. The consultation confirmed an ongoing need for household maintenance assistance for low/moderate income senior households in Plymouth and suburban Hennepin County. See narrative in AP-85. |
|---|--|--|
| 8 | Agency/Group/Organization | City of Plymouth |
| | Agency/Group/Organization Type | PHA Grantee Department |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy |

| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Housing Choice Voucher (HCV) Department (which acts as the PHA for the City of Plymouth) was consulted throughout the needs assessment and goal- setting process for the Consolidated Plan. Additionally, HCV staff are consulted periodically to identify local housing needs. Staff will refer residents to Housing link to assist with finding housing and anticipate higher outcomes of finding housing that fits their needs. The Housing Choice Voucher (HCV) Department (which acts as the PHA for the City of Plymouth) was consulted throughout the needs assessment and goal-setting process for the Consolidated Plan. Additionally, HCV staff are consulted periodically to identify local housing needs. Staff will refer residents to Housing link to assist with finding housing and anticipate higher outcomes of finding housing that fits their needs. |
|----|--|--|
| 9 | Agency/Group/Organization | NEW HOPE |
| | Agency/Group/Organization Type | Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs 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? | In addition to participating in the Consortium survey, the City of New Hope and Plymouth city staff regularly discuss community development and housing needs. The consultation will help develop Priority Needs and Goals. |
| 10 | Agency/Group/Organization | City of Maple Grove |
| | Agency/Group/Organization Type | Other government - Local |

| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Non-Homeless Special Needs 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? | In addition to participating in the Consortium survey, the City of Maple Grove and Plymouth city staff regularly discuss community development and housing needs. The consultation will help develop Priority Needs and Goals. |
| 11 | Agency/Group/Organization | MINNETONKA |
| | Agency/Group/Organization Type | Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Non-Homeless Special Needs 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? | In addition to participating in the Consortium survey, the City of Minnetonka and Plymouth city staff regularly discuss community development and housing needs. Consultation will help develop Priority Needs and Goals. |
| 12 | Agency/Group/Organization | Metropolitan Council - Metro HRA |
| | Agency/Group/Organization Type | Housing PHA Regional organization |

| What section of the Plan was addressed by Consultation? | Housing Need Assessment 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? | Plymouth and the Metropolitan Council regularly coordinate and communicate regarding economic/community development and affordable housing issues including coordination between the Housing Policy Plan and the Consolidated Plan. Goals in the Consolidated Plan may overlap with Metropolitan Council affordable housing goals for cities. |

| 13 | Agency/Group/Organization | Office to End Homelessness |
|----|--------------------------------|--|
| | Agency/Group/Organization Type | Housing |
| | | РНА |
| | | Services - Housing |
| | | Services-Children |
| | | Services-Elderly Persons |
| | | Services-Persons with Disabilities |
| | | Services-Persons with HIV/AIDS |
| | | Services-Victims of Domestic Violence |
| | | Services-homeless |
| | | Services-Health |
| | | Services-Education |
| | | Services-Employment |
| | | Service-Fair Housing |
| | | Services - Victims |
| | | Health Agency |
| | | Child Welfare Agency |
| | | Publicly Funded Institution/System of Care |
| | | Other government - Federal |
| | | Other government - County |
| | | Other government - Local |
| | | Regional organization |
| | | Planning organization |
| | | Business Leaders |
| | | Foundation |
| | | Neighborhood Organization |

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| What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis |
|--|---|
| Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Office to End Homelessness has played a key role in the development of all housing and homeless-related sections of the plan. Coordination will continue throughout the plan. |

| 14 | Agency/Group/Organization | Hennepin County Human Services and Public Health Department |
|----|--------------------------------|---|
| | Agency/Group/Organization Type | Housing |
| | | PHA |
| | | Services - Housing |
| | | Services-Children |
| | | Services-Elderly Persons |
| | | Services-Persons with Disabilities |
| | | Services-Persons with HIV/AIDS |
| | | Services-Victims of Domestic Violence |
| | | Services-homeless |
| | | Services-Health |
| | | Services-Education |
| | | Services-Employment |
| | | Service-Fair Housing |
| | | Services - Victims |
| | | Health Agency |
| | | Child Welfare Agency |
| | | Publicly Funded Institution/System of Care |
| | | Other government - Federal |
| | | Other government - State |
| | | Other government - County |
| | | Other government - Local |
| | | Regional organization |
| | | Business Leaders |

| | What section of the Plan was addressed by Consultation? Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or | Housing Need Assessment Non-Homeless Special Needs Market Analysis Consortium staff meets with staff from Hennepin County Human Services and Public Health Department (HSPHD) regarding market conditions, housing needs, gaps in service, and recommendations for priorities. Additionally, HSPHD staff |
|----|--|---|
| | areas for improved coordination? | participates in HOME application reviews. |
| 15 | Agency/Group/Organization | Minnesota Department of Health |
| | Agency/Group/Organization Type | Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Health Agency Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - State |
| | What section of the Plan was addressed by Consultation? | Lead-based Paint Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | MDH was consulted regarding data on child lead poisoning and the importance of broadband internet access. Consultation was used to develop the Lead-based paint strategy of this Plan. |

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

Plymouth was actively involved in the Consortium consultation, development, and citizen participation process led by Hennepin County for the 2020-2024 Consolidated Plan. All agency types were consulted through the Consortium's Consolidated Plan development and goal-setting process. For this Action Plan, which is the fourth annual Action Plan in the 2020-2024 Consolidated Plan cycle, some agency types were consulted again to assess whether substantial trends or changes had occurred since the Consolidated Planning process.

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

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|----------------------|--|--|
| Continuum of Care | Hennepin County | The Plymouth CDBG Action Plan and Five-Year Consolidated Plan identified homelessness prevention activities as important goals. This includes direct homelessness prevention housing assistance as well as foreclosure prevention counseling and tenant advocacy to prevent eviction. |
| Comprehensive Plan | City of Plymouth | The Plymouth CDBG Action Plan and Five-Year Consolidated Plan have significant overlap with the Plymouth Comprehensive Plan. Both the CDBG Action Plan and the Housing section of the Comprehensive Plan identify several goals related to providing affordable and well- maintained housing that is accessible for all income levels, household types, and life cycle stages. |
| Metropolitan Council | Metropolitan Council | The Plymouth CDBG Action Plan and Five-Year Consolidated Plan have overlap with the Housing Policy Plan. Both plans identify priorities related to maintaining existing affordable housing stock and providing a mix of affordable housing options for households of all life stages and economic means. |
| Strategic Plan | Plymouth Housing and Redevelopment Authority | The Plymouth CDBG Action Plan and Five-Year Consolidated Plan have overlap with the HRA's strategic plan. Both plans identify policies and actions that the HRA can take related to maintaining affordable housing stock and creating new affordable housing options for households at all stages of life. |

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|--------------------------|-------------------|--|
| MA-60 Broadband Needs | City of Plymouth | According to the 2020 ACS 5-year data profile, 92.7% of Plymouth residents have a computer while 87.0% have a broadband internet connection. In Minnesota, households with lower incomes are less likely to have a broadband subscription at home, hurting their ability to complete homework, search for better jobs, and stay connected to the world. According to data from the Federal Communications Commission, households in all areas of suburban Hennepin County are served by at least two fixed residential broadband providers. Further, 98.5% of the population is served by at least three providers. Access to broadband provider options is not clearly associated with low and moderate-income neighborhood clusters, in suburban Hennepin County and by extension, Plymouth. |

| | 1 | |
|-------------------------|------------------|---|
| | | In 2018, Hennepin County's Emergency Management division put together a hazard |
| | | mitigation plan, which includes Plymouth in its scope. The risk assessment process |
| | | measures the potential loss to a community, including loss of life, personal injury, property |
| | | damage and economic injury resulting from a hazard event. The risk assessment process |
| | | allows a community to better understand their potential risk and associated vulnerability |
| | | to natural, intentional human-caused and unintentional human-caused hazards. The |
| | | planning process identified the following consequences could be expected with climate |
| | | change across Hennepin County:- Less reliable and more dangerous lake ice- More periods |
| | | of bare/snow- free ground, allowing frost to penetrate to great depths during cold |
| | | outbreak- Expansion of the heavy rainfall season, leading to enhanced peak stream flows, |
| | | and altered timing of normal flow regime- Increased runoff and flash-flooding as the |
| | | largest events intensify and become more common- Water infrastructure damage from |
| MA-65 Hazard | | intense rainfall events- Agricultural stress, from shifting crop ranges, heat, drought, |
| Mitigation - | City of Plymouth | extreme rainfall- More days with high water vapor content and heat index values- Greater |
| 91.210(a)(S}, 91.310(a) | | summer cooling costs, more days requiring cooling- New invasive species, both terrestrial |
| | | and aquatic, especially those acclimated to warmer climates or those that were cold |
| | | weather limited Hyper-seasonality as warm conditions develop during the off-season, |
| | | leading to bouts of heavy rainfall or severe weather, followed by wintry conditions- |
| | | Increase in frequency of freeze-thaw cycles, as winter is increasingly infiltrated by warm |
| | | conditions. Data from Minnesota's State Climatology Office already show a clear pattern of |
| | | increasing temperatures at night and in winter and larger, more frequent extreme |
| | | precipitation events. The Twin Cities metro area, including Hennepin County, is already |
| | | seeing substantial warming during winter and at night, increased precipitation, and heavier |
| | | downpours. State climatologists project that the decades ahead will bring even warmer |
| | | winters, warmer summer nights, and even larger rainfalls, along with the likelihood of |
| | | increased summer heat and the potential for longer dry spells. The City of Plymouth is the |
| | | lead organization for hazard mitigation, management of flood prone areas, and emergency |
| | | |

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| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|--------------|-------------------|--|
| | | management as it relates to the CDBG program overall and for each environmental review |
| | | processed. |

Table 3 - Other local / regional / federal planning efforts

Narrative

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

Plymouth also works with the Metropolitan Council to coordinate regional economic/community development goals, as well as affordable housing issues including coordination between the Housing Policy Plan and the Consolidated Plan. Goals in the Consolidated Plan often overlap with Metropolitan Council affordable housing goals for cities.

The Plymouth CDBG program attempts to address the widest range of needs possible despite limited resources. Both the Consolidated Plan and the Action Plan identifies a variety of goals to promote housing affordability, provide suitable and well-maintained housing, and accessibility to needed social services. These goals were developed in consultation with numerous public, non-profit, and private sector partners, and agencies during the 2020-2024 Consolidated Plan process and throughout the annual Action Plan processes.

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

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

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

In addition to public hearings conducted by the County Board, the City of Plymouth will hold a public hearing to receive comments regarding the annual projects and activities to be funded. The Plymouth Housing and Redevelopment Authority will hold a public hearing on March 28, 2024 and asked the public to comment on the proposed activities. Notice of public comment period will be published in the local newspaper on February 29, 2024. Notice of the public hearing will be published in the official local newspaper on March 7, 2024 as well as on the City website. The City of Plymouth holds these public hearings at times and locations convenient to potential and actual beneficiaries. Written comments will

be accepted from February 29, 2024 to April 1, 2024 prior to the City of Plymouth City Council authorization of the 2024 Annual Action Plan on April 9, 2024.

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

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

Citizen Participation Outreach

| Sort Or der | Mode of Outr each | Target of Outr each | Summary of response/atten dance | Summary of comments rec eived | Summary of com ments not accepted and reasons | URL (If applicable) |
|----------------|----------------------|--------------------------------------|--|-------------------------------------|--|---------------------|
| 1 | Newspaper Ad | Non- targeted/broa d community | NONE | NONE | NONE | |
| 2 | Public Hearing | Non- targeted/broa d community | Attendance from Three public service organizations, HOME Line, Prism, Senior Community Services, to share appreciation and outline the community need for their services. | NONE | NONE | |

| Sort Or der | Mode of Outr each | Target of Outr each | Summary of response/atten dance | Summary of comments rec eived | Summary of com ments not accepted and reasons | URL (If applicable) |
|----------------|----------------------|--------------------------------------|---------------------------------------|-------------------------------------|--|--|
| 3 | Internet Outreach | Non- targeted/broa d community | NONE | NONE | NONE | https://www.plymouthmn.gov/depart ments/commu nity-economic- development/housing |

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

For the 2024 CDBG program year, Plymouth's CDBG allocation is \$267,284. Additionally, \$80,000 of program income is anticipated.

Anticipated Resources

| Program | Source | Uses of Funds | Expec | ted Amoun | t Available Ye | ar 1 | Expected | Narrative Description |
|---------|----------|-----------------|-------------|-----------|----------------|---------|------------|---|
| | of | | Annual | Program | Prior Year | Total: | Amount | |
| | Funds | | Allocation: | Income: | Resources: | \$ | Available | |
| | | | \$ | \$ | \$ | | Remainder | |
| | | | | | | | of ConPlan | |
| | | | | | | | \$ | |
| CDBG | public - | Acquisition | | | | | | For the 2024 CDBG program year, |
| | federal | Admin and | | | | | | Plymouth will receive an allocation of |
| | | Planning | | | | | | \$267,284.Additionally, \$80,000 of |
| | | Economic | | | | | | program income. For the remainder of the |
| | | Development | | | | | | 5-year Consolidated Plan period, |
| | | Housing | | | | | | Plymouth estimated an annual CDBG |
| | | Public | | | | | | allocation of \$262,452, based on funding |
| | | Improvements | | | | | | trends. Program income of \$80,000is |
| | | Public Services | 267,284 | 80,000 | 0 | 347,284 | 280,000 | projected annually. |

| Program | Source | Uses of Funds | Expec | ted Amoun | t Available Ye | ar 1 | Expected | Narrative Description |
|-----------|----------|---------------|-------------|-----------|-------------------|--------|------------|---|
| | of | | Annual | Program | Prior Year | Total: | Amount | |
| | Funds | | Allocation: | Income: | Resources: | \$ | Available | |
| | | | \$ | \$ | \$ | | Remainder | |
| | | | | | | | of ConPlan | |
| | | | | | | | Ş | |
| LIHTC | public - | Housing | | | | | | The HRA has been working with several |
| | federal | | | | | | | private developers to utilize this resource |
| | | | | | | | | to create new affordable apartment units. |
| | | | | | | | | The HRA will continue to pursue |
| | | | 0 | 0 | 0 | 0 | 0 | opportunities to use LIHTC when possible. |
| Section 8 | public - | Housing | | | | | | Currently the Plymouth HRA has funding |
| | federal | | | | | | | for 250 vouchers (including 40 vouchers |
| | | | | | | | | for non-elderly disabled and 10 VASH |
| | | | | | | | | vouchers). There are another 106 voucher |
| | | | | | | | | holders residing in Plymouth who ported |
| | | | 0 | 0 | 0 | 0 | 0 | inform other jurisdictions. |

| Program | Source | Uses of Funds | Expec | ted Amoun | t Available Ye | ar 1 | Expected | Narrative Description |
|----------|-------------|---------------|-----------------------------|--------------------------|--------------------------------|--------------|--|---|
| | of Funds | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | Amount Available Remainder of ConPlan \$ | |
| Тах | public - | Housing | | | | | | Since 1995, the City has |
| Exempt | local | | | | | | | issued\$58,795,000.00 in tax-exempt |
| Bond | | | | | | | | housing revenue bonds and \$7,290,000.00 |
| Proceeds | | | | | | | | in taxable housing revenue bonds for the |
| | | | | | | | | acquisition, re-financing and/ or |
| | | | | | | | | renovation of 893 rental apartments. The |
| | | | | | | | | City required that the owners make a |
| | | | | | | | | certain percentage of their units |
| | | | | | | | | affordable to and occupied by low-income |
| | | | | | | | | households or make an annual payment |
| | | | | | | | | for the life of the bonds to the HRA's |
| | | | | | | | | Affordable Housing Account. As a result, |
| | | | | | | | | 220 of these units are affordable to low- |
| | | | 0 | 0 | 0 | 0 | 0 | income renters. |

| Тах | public - | Housing | | | | | | The City's Tax Increment Housing |
|-----------|----------|---------|---|---|---|---|---|--|
| Increment | local | | | | | | | Assistance Program (TIHAP) makes excess |
| Financing | | | | | | | | Tax Increments from existing and future |
| | | | | | | | | Tax Increment Districts in the City |
| | | | | | | | | available for eligible affordable housing |
| | | | | | | | | developments. Of the funds received to |
| | | | | | | | | date, the City has allocated a total of |
| | | | | | | | | \$1,383,000 split between three projects |
| | | | | | | | | to secure 308 units of affordable housing |
| | | | | | | | | ranging from households at or below 30% |
| | | | | | | | | to 60% of the area median income (AMI). |
| | | | | | | | | In addition, the City and HRA have create |
| | | | | | | | | several tax increment financing districts to |
| | | | | | | | | provide assistance for development of |
| | | | | | | | | affordable housing units. Since 1998 the |
| | | | | | | | | City and HRA have established seven tax |
| | | | | | | | | increment financing and secured 337 units |
| | | | | | | | | of affordable housing ranging in |
| | | | | | | | | affordability between households at or |
| | | | | | | | | below 30% to 60% AMI. The City will |
| | | | | | | | | consider the creation of additional TIF |
| | | | | | | | | districts as appropriate to assist with |
| | | | | | | | | development of affordable housing units |
| | | | 0 | 0 | 0 | 0 | 0 | to supplement outside funding. |
| Other | public - | Housing | | | | | | Minnesota Housing Finance Agency |
| | state | | | | | | | (MHFA): This agency provides first time |
| | | | | | | | | homebuyer programs, housing |
| | | | 0 | 0 | 0 | 0 | 0 | rehabilitation programs, and development |

| Program | Source | Uses of Funds | Expec | ted Amoun | t Available Ye | ar 1 | Expected | Narrative Description |
|---------|--------|---------------|-------------|-----------|----------------|--------|------------|---|
| | of | | Annual | Program | Prior Year | Total: | Amount | |
| | Funds | | Allocation: | Income: | Resources: | \$ | Available | |
| | | | \$ | \$ | \$ | | Remainder | |
| | | | | | | | of ConPlan | |
| | | | | | | | Ş | |
| | | | | | | | | and redevelopment financing through |
| | | | | | | | | their Consolidated RFP process. The HRA |
| | | | | | | | | also developed a partnership in 2003 with |
| | | | | | | | | the Center for Energy and Environment |
| | | | | | | | | (CEE) pertaining to the MHFA Fix-Up Fund |
| | | | | | | | | and MHFA Deferred Loan Program. While |
| | | | | | | | | CEE remains the approved lender for the |
| | | | | | | | | Fix-Up Fund, the HRA works in |
| | | | | | | | | collaboration with them in marketing the |
| | | | | | | | | program. |

| Program | Source | Uses of Funds | Expected Amount Available Year 1 | | | | Expected | Narrative Description |
|---------|-------------|---------------|----------------------------------|--------------------------|--------------------------------|--------------|--|---|
| | of Funds | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | Amount Available Remainder of ConPlan \$ | |
| Other | public - | Economic | | | | | · · · | Plymouth Economic Development Fund |
| | local | Development | | | | | | (PEDF): The Fund was capitalized from the |
| | | | | | | | | first \$100,000 in principal plus interest to |
| | | | | | | | | be paid by Value Rx in repayment of a |
| | | | | | | | | loan from the Minnesota Department of |
| | | | | | | | | Trade and Economic Development's |
| | | | | | | | | (DTED) Economic Recovery Program (ERP). |
| | | | | | | | | The PEDF allows the HRA to provide loans |
| | | | | | | | | at favorable terms for business activities |
| | | | | | | | | in the City that could create new jobs, |
| | | | | | | | | increase the tax base, or leverage other |
| | | | | | | | | needed economic development funds. |
| | | | | | | | | The City has issued two loans totaling |
| | | | | | | | | \$210,000. One loan in the amount of |
| | | | | | | | | \$180,000 went to a company that |
| | | | | | | | | relocated its headquarters to Plymouth. |
| | | | | | | | | The second loan, in the amount of |
| | | | | | | | | \$30,000, went to an existing Plymouth |
| | | | 0 | 0 | 0 | 0 | 0 | company to increase their workforce. |

| Program | Source | Uses of Funds | Expec | ted Amoun | t Available Ye | ar 1 | Expected | Narrative Description |
|---------|----------|---------------|-------------|-----------|----------------|--------|------------|---|
| | of | | Annual | Program | Prior Year | Total: | Amount | |
| | Funds | | Allocation: | Income: | Resources: | \$ | Available | |
| | | | \$ | \$ | \$ | | Remainder | |
| | | | | | | | of ConPlan | |
| | | | | | | | Ş | |
| Other | public - | Housing | | | | | | Plymouth HRA Tax Levy: The HRA has |
| | local | | | | | | | used this levy for several years to provide |
| | | | | | | | | subsidized rental housing for 195 senior |
| | | | | | | | | citizen households utilizing |
| | | | | | | | | approximately\$310,000.00 annually to |
| | | | | | | | | eligible renters at Plymouth Towne Square |
| | | | | | | | | and Vicksburg Crossing. An additional |
| | | | | | | | | \$348,823.00 is utilized for the funding, |
| | | | | | | | | administration, and supervision of the |
| | | | | | | | | HRA and City affordable housing |
| | | | 0 | 0 | 0 | 0 | 0 | programs. |

Table 5 - Expected Resources – Priority Table

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

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

In addition, Interfaith Outreach & Community Partners (IOCP) has been a very supportive partner of Plymouth's efforts to further affordable

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housing goals. To this end, IOCP has a significant housing fund to assist in funding affordable housing efforts both in Plymouth and the region.

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 of Plymouth owns two senior rental housing developments. Plymouth Towne Square, developed in 1994, has provided 99 affordable housing units/ subsidized senior housing units through an annual amount of Plymouth HRA tax levy ranging from \$250,000.00 to \$320,000.00. By providing a deep subsidy, the HRA is working to help the residents at PTS obtain decent, affordable housing and to avoid homelessness.

Plymouth Towne Square averaged an occupancy of 99% in 2023. Vicksburg Crossing, built in 2006 with 96 units, offers affordable rents to lowand moderate-income residents. The HRA Board sets rents on an annual basis. A subsidy of \$18,000-\$60,000 from the HRA tax levy helps keep rent levels affordable. Vicksburg Crossings averaged an occupancy of 99% in 2023.

The Plymouth HRA administers a scattered site rental housing program (SSHP) where they own and manage affordable and workforce single family and twin home properties. The City's Garland property is a home that has accessibility features and is a Plymouth Resident that meets the very low-income limits.

Discussion

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

Annual Goals and Objectives

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

Goals Summary Information

| Sort | Goal Name | Start | End | Category | Geographic | Needs Addressed | Funding | Goal Outcome Indicator |
|-------|-------------------|-------|------|---------------|------------|---------------------|-----------|-----------------------------------|
| Order | | Year | Year | | Area | | | |
| 1 | Homeowner | 2020 | 2024 | Affordable | City of | Preserve/Create | CDBG: | Homeowner Housing |
| | rehabilitation | | | Housing | Plymouth | Single Family | \$77,284 | Rehabilitated: 7 Household |
| | assistance | | | | | Homeownership | | Housing Unit |
| 2 | Direct homebuyer | 2020 | 2024 | Affordable | City of | Preserve/Create | CDBG: | Direct Financial Assistance to |
| | assistance | | | Housing | Plymouth | Single Family | \$155,000 | Homebuyers: 4 Households |
| | | | | | | Homeownership | | Assisted |
| 3 | Facilities for | 2020 | 2024 | Non-Homeless | City of | Preserve/Create | CDBG: | Rental units constructed: 4 |
| | Persons with | | | Special Needs | Plymouth | Multifamily Rental | \$31,500 | Household Housing Unit |
| | Disabilities | | | | | Opportunities | | |
| 4 | Homeowner | 2020 | 2024 | Non-Housing | City of | Education, outreach | CDBG: | Public Facility or Infrastructure |
| | education | | | Community | Plymouth | and services. | \$5,000 | Activities for Low/Moderate |
| | | | | Development | | | | Income Housing Benefit: 50 |
| | | | | | | | | Households Assisted |
| 5 | Tenant counseling | 2020 | 2024 | Non-Housing | City of | Education, outreach | CDBG: | Public service activities for |
| | | | | Community | Plymouth | and services. | \$10,000 | Low/Moderate Income |
| | | | | Development | | | | Housing Benefit: 220 |
| | | | | | | | | Households Assisted |
| 6 | Senior services | 2020 | 2024 | Non-Housing | City of | Education, outreach | CDBG: | Public Facility or Infrastructure |
| | | | | Community | Plymouth | and services. | \$12,000 | Activities for Low/Moderate |
| | | | | Development | | | | Income Housing Benefit: 56 |
| | | | | | | | | Households Assisted |

| Sort | Goal Name | Start | End | Category | Geographic | Needs Addressed | Funding | Goal Outcome Indicator |
|-------|----------------|-------|------|----------------|------------|---------------------|----------|-------------------------------|
| Order | | Year | Year | | Area | | | |
| 7 | Homelessness | 2020 | 2024 | Non-Housing | City of | Education, outreach | CDBG: | Public service activities for |
| | prevention | | | Community | Plymouth | and services. | \$24,000 | Low/Moderate Income |
| | | | | Development | | | | Housing Benefit: 17 |
| | | | | | | | | Households Assisted |
| 8 | Fair Housing | 2020 | 2024 | Fair Housing | City of | Education, outreach | CDBG: | Other: 0 Other |
| | | | | | Plymouth | and services. | \$2,500 | |
| 9 | Administration | 2020 | 2024 | Program | City of | Education, outreach | CDBG: | Other: 0 Other |
| | | | | Administration | Plymouth | and services. | \$30,000 | |

Table 6 – Goals Summary

Goal Descriptions

| 1 | Goal Name | Homeowner rehabilitation assistance | | | | | |
|---|---------------------|--|--|--|--|--|--|
| | Goal Description | Provide zero interest loans and grants to assist low/moderate income households to make needed home repairs and address lead-based paint issues as needed. | | | | | |
| 2 | Goal Name | Direct homebuyer assistance | | | | | |
| | Goal Description | Provide zero interest deferred loans to low/moderate-income first-time homebuyer households to help make the purchase of a home more affordable. Also, provide grants to community land trusts/non-profit agencies to help lessen the cost burden on low/moderate income homebuyers. | | | | | |

| 3 | Goal Name | Facilities for Persons with Disabilities |
|---|----------------------------|--|
| | Goal Description | Assist with the rehabilitation of affordable rental group homes operated by Hammer Residences. Hammer Residences, Inc. provides housing and support to individuals who have developmental disabilities. The projects will support housing for these individuals through necessary updates. |
| 4 | Goal Name | Homeowner education |
| | Goal Description | Provide funding to support homebuyer education and outreach. This activity will support homebuyer counseling, whose role in financial counseling sessions is to provide credit, budget, and money management education. |
| 5 | Goal Name | Tenant counseling |
| | Goal Description | Provides tenant counseling services to low/moderate income households that are in facing eviction or other housing related hardships. |
| 6 | Goal Name | Senior services |
| | Goal Description | Provide household maintenance assistance to low/moderate income senior households |
| 7 Goal Name Homelessness prevention | | Homelessness prevention |
| Goal Provide emergency, short-term housing assistance to low/moderate income households experiencing tempor Description financial crises. | | Provide emergency, short-term housing assistance to low/moderate income households experiencing temporary financial crises. |
| 8 Goal Name Fair Housing | | Fair Housing |
| | Goal Description | Assist in regional efforts to further fair housing, including evaluation and implementation activities. |
| 9 | 9 Goal Name Administration | |
| | Goal Description | Provides for 1) Oversight, management, monitoring and coordination of the CDBG Program. 2) Public information on CDBG Program activities available to all residents. |

AP-35 Projects - 91.420, 91.220(d)

Introduction

The Plymouth HRA will implement the following activities during the program year to address the strategies and priorities of the 2020-2024 Consolidated Plan.

| # | Project Name | |
|---------------------------------|--|--|
| 1 | Housing Rehabilitation | |
| 2 | First Time Homebuyer Assistance | |
| 3 | Affordable Housing Land Trust | |
| 4 | Facilities for Persons with Disabilities | |
| 5 | Homeownership Counseling | |
| 6 | Tenant Counseling (HOME Line) | |
| 7 Senior Services | | |
| 8 Homelessness Prevention PRISM | | |
| 9 | Homelessness Prevention INTERFAITH | |
| 10 | Fair Housing | |
| 11 | Program Administration | |

Table 7 – Project Information

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

The activities supported directly by the HRA include administering an owner-occupied rehabilitation program and a FTHB program - both programs serve LMI individuals and households in the Plymouth community well, allowing us to assist households to be able to stay and maintain their homes and become FTHBs with some additional support. Any increase or decrease to Plymouth's actual 2024 CDBG allocation will be added to or subtracted from the Housing Rehabilitation project. In addition, the HRA will continue to support the Homes Within Reach land trust to support affordable homeownership in Plymouth. The land trust model can be an effective strategy for supporting homebuyers in markets with high median home prices by helping to create more affordability through the write-down of the land in the transaction. While median home prices continue to rise in Plymouth, providing subsidy into a land trust home helps extend affordability throughout the 99-year land lease, creating future affordability at the time of sale. In addition, the HRA will support fair housing activities, homebuyer education and foreclosure prevention, homelessness prevention, a tenant hotline to help tenants preserve affordable rental housing, and minor home maintenance support for LMI seniors. By supporting five organizations with public services funding, we can expand support for more comprehensive housing needs in our community. The biggest obstacle to addressing affordable homeownership needs is the relatively high median home price in the City of Plymouth (\$450,500 according to SPAAR in 2024) that present barriers to entry for many prospective first-time homeowners.

AP-38 Project Summary

Project Summary Information

| Project Name | Housing Rehabilitation |
|--|---|
| Target Area | City of Plymouth |
| Goals Supported | Homeowner rehabilitation assistance |
| Needs Addressed | Preserve/Create Single Family Homeownership |
| Funding | CDBG: \$77,284 |
| Description | The Plymouth HRA offers two programs to assist low/moderate-income homeowners rehabilitating their homes. The Housing Rehabilitation Loan Program offers deferred zero-interest loans up to \$40,000 to homeowners for needed home repairs. The Emergency Repair Program provides grants up to \$7,500 for emergency/urgent home repairs for senior citizens. |
| Target Date | 6/30/2025 |
| Estimate the number and type of families that will benefit from the proposed activities | During the 2024 program year, the City expects to assist 6-8 households with home rehabilitation. |
| Location Description | The program is available to residents city-wide that are of low- and moderate-income households. |

| | Planned Activities | The HRA will continue to operate two housing rehabilitation programs: The Housing Rehab Loan program and the Emergency Repair program. The Housing Rehab program offers 0% interest deferred loans up to |
|---|--------------------|---|
| | | \$40,000 for low- and moderate-income homeowners to rehabilitate their owner-occupied homes. An additional \$10,000 is available to households in need of accessibility improvements for disabled residents and/or lead paint hazard reduction. Applications are accepted year-round on a first- come first-serve basis. The loans must be repaid only if the property is sold or transferred within 20 years. Loan funds may be used for qualifying safety and energy efficiency upgrades, including roofing, siding, windows, electrical, plumbing, heating, and insulation. Other repairs may also be eligible as determined by a home inspection. The Emergency Repair program helps in the form of a grant to senior (55+) homeowners. Eligible repairs include a red-tagged furnace or water heater, broken windows, faulty electrical or plumbing systems. Other repairs may also be eligible as determined by a home inspection. |
| 2 | Project Name | First Time Homebuyer Assistance |
| | Target Area | City of Plymouth |
| | Goals Supported | Direct homebuyer assistance |
| | Needs Addressed | Preserve/Create Single Family Homeownership |
| | Funding | CDBG: \$105,000 |
| | Description | This program provides direct homeownership assistance to low and moderate-income first-time homebuyers who wish to purchase a single- family home, condo, cluster home, or townhouse in the City of Plymouth. The program provides financial assistance to eligible families through 0% interest deferred loans of up to \$35,000 to pay for eligible closing costs, up to 50% of the required down payment, and a reduction of a portion of the mortgage principal. |
| | Target Date | 6/30/2025 |

| | Estimate the number and type of families that will benefit from the proposed activities | The HRA expects to assist three households with direct homeownership during the program year. |
|---|--|---|
| | Location Description | The program is available city-wide to low- and moderate-income households purchasing their first home. The home being purchased may be located anywhere within Plymouth. The households purchasing the home are not required to have resided in Plymouth before purchasing the home. |
| | Planned Activities | The program provides assistance to low and moderate-income first-time homebuyers who wish to buy a single-family home, condo, cluster home, or townhouse in Plymouth. The program provides financial assistance to eligible families through 0% interest deferred loans of up to \$35,000 to pay for eligible closing costs, up to 50% of the required down payment, and a portion of the mortgage principal reduction. Applications are accepted throughout the year on a first-come, first-serve basis. Loans must be repaid if the property is sold, transferred, non-homesteaded, or 30 years from the initial purchase date when the mortgage becomes due and payable. Due to a tight housing market within the City of Plymouth, there is expected carryover that will be used to help fund the program through the 2024 program year, as well as program income. |
| 3 | Project Name | Affordable Housing Land Trust |
| | Target Area | City of Plymouth |
| | Goals Supported | Direct homebuyer assistance |
| | Needs Addressed | Preserve/Create Single Family Homeownership |
| | Funding | CDBG: \$50,000 |
| | Description | The Plymouth HRA will provide a grant to Homes Within Reach to assist with the acquisition of two homes in the City of Plymouth. This home will be part of Homes Within Reach's Affordable Housing Land Trust and will be made available for purchase to a low/moderate-income family. |

| | Target Date | 6/30/2025 |
|---|--|--|
| | Estimate the number and type of families that will benefit from the proposed activities | The HRA expects to assist with the purchase of two homes that will be made available for purchase by a low/moderate income family as part of the West Hennepin Affordable Housing Land Trust. |
| | Location Description | |
| | Planned Activities | The homes purchased will be located within the City of Plymouth. It is not a requirement that the family that purchases the home resides in |
| | | Plymouth prior to the purchase. |
| 4 | Project Name | Facilities for Persons with Disabilities |
| | Target Area | City of Plymouth |
| | Goals Supported | Facilities for Persons with Disabilities |
| | Needs Addressed | Preserve/Create Multifamily Rental Opportunities |
| | Funding | CDBG: \$31,500 |
| | Description | Assist with the rehabilitation of affordable rental group homes operated by Hammer Residences. Hammer Residences, Inc. provides housing and support to individuals who have developmental disabilities. The projects will support housing for these individuals through necessary updates. |
| | Target Date | 6/30/2025 |
| | Estimate the number and type of families that will benefit from the proposed activities | Eighteen low/moderate-income individuals currently reside in each of the 4 homes slated to be rehabilitated/modified to increase mobility and aging in place during the program year. |

| | Location Description | Four Hammer residence homes are located within the City of Plymouth. Those homes are 1st Ave, Garland, McGlinch, & Merrimac |
|---|--|--|
| | Planned Activities | Hammer Residences provides housing and support to individuals who have developmental disabilities. The HRA will provide funds to for renovations, energy-efficiency upgrades, and accessibility improvements including handicap ramp repair, installing wheelchair friendly flooring, installing step-in showers, and installing drain tile system. |
| 5 | Project Name | Homeownership Counseling |
| | Target Area | City of Plymouth |
| | Goals Supported | Homeowner education |
| | Needs Addressed | Education, outreach and services. |
| | Funding | CDBG: \$5,000 |
| | Description | Lutheran Social Services will provide homebuyer education, foreclosure prevention, reverse mortgage, and other homeowner counseling services to homeowner and/or potential homebuyer households in Plymouth. |
| | Target Date | 6/30/2025 |
| | Estimate the number and type of families that will benefit from the proposed activities | Lutheran Social Services (LSS) will provide homebuyer education, reverse mortgage, debt counseling, and other homeowner counseling services to SO homeowner and/or potential homebuyer households in Plymouth. |
| | Location Description | All clients served will be low- and moderate-income Plymouth households or families that will be purchasing a home in Plymouth. |
| | Planned Activities | LSS will provide housing counseling services including mortgage counseling, reverse mortgage assistance, and foreclosure prevention. |
| | Project Name | Tenant Counseling (HOME Line) |

| 6 | Target Area | City of Plymouth |
|---|--|---|
| | Goals Supported | Tenant counseling |
| | Needs Addressed | Education, outreach and services. |
| | Funding | CDBG: \$10,000 |
| | Description | HOME Line offers a tenant advocacy hotline that is available to all Plymouth residents. |
| | Target Date | 6/30/2025 |
| | Estimate the number and type of families that will benefit from the proposed activities | HOME Line anticipates serving 220 Plymouth renter households through their tenant hotline. |
| | Location Description | The program is available city-wide to low- and moderate-income renter households in Plymouth. |
| | Planned Activities | HOME Line will continue to operate their tenant advocacy hotline available to Plymouth renters. The CDBG allocation will assist with staff costs for providing tenant advocacy for low- and moderate-income Plymouth renter households. |
| 7 | Project Name | Senior Services |
| | Target Area | City of Plymouth |
| | Goals Supported | Senior services |
| | Needs Addressed | Education, outreach and services. |
| | Funding | CDBG: \$12,000 |

| Description | Senior Community Services will provide low to moderate income seniors in the City of Plymouth with maintenance services through the H.O.M.E (Housing Outside Maintenance for the Elderly) Program. This will allow the seniors to stay in their homes with dignity and safety by providing homemaking, grab bars & other safety installations, minor repairs, exterior home maintenance, interior and exterior painting, yard work, lawn mowing, and snow removal on a sliding fee scale based on income. |
|--|--|
| Target Date | 6/30/2025 |
| Estimate the number and type of families that will benefit from the proposed activities | 68 low/moderate-income seniors will benefit from this funding |
| Location Description | All senior citizens (age 55+) who are residents of the City of Plymouth are able to access the H.O.M.E. program. |
| Planned Activities | Senior Community Services will provide low/moderate income seniors in the City of Plymouth with maintenance services through the H.O.M.E (Housing Outside Maintenance for the Elderly) Program. This will allow the seniors to stay in their homes with dignity and safety by providing homemaking, grab bars & other safety installations, minor repairs, exterior home maintenance, interior and exterior painting, yard work, lawn mowing, and snow removal on a sliding fee scale based on income. Clients are required to complete a H.O.M.E Service Request form that contains gender, race & ethnicity, address, and monthly income information. Proof of income letters pay stubs, W-2s and social security and account statements are all used to gather relevant client information. |
| Project Name | Homelessness Prevention PRISM |
| Target Area | City of Plymouth |
| Goals Supported | Homelessness prevention |
| Needs Addressed | Education, outreach and services. |

| Funding | CDBG: \$14,000 |
|--|--|
| Description | People Responding in Social Ministry (PRISM) will provide short-term (up to three months) housing subsistence payments on behalf of low/moderate-income persons living in the City of Plymouth to help prevent homelessness. Assistance may include utility payments to prevent cutoff of service and rent/mortgage payments to prevent eviction or foreclosure. |
| Target Date | 6/30/2025 |
| Estimate the number and type of families that will benefit from the proposed activities | PRISM expects to help 12 Plymouth households with homelessness prevention during the 2023 program year. |
| Location Description | PRISM's program is available to low- and moderate-income households city-wide. |
| Planned Activities | People Responding in Social Ministry (PRISM) will provide short-term (up to three months) housing subsistence payments on behalf of low/moderate income persons living in the City of Plymouth to help prevent homelessness. Assistance may include utility payments to prevent cutoff of service and rent/mortgage payments to prevent eviction or foreclosure. Clients are required to provide proof of income through paystubs, bank statements, tax returns or other forms. The program will be available to low/moderate income residents city-wide. |
| Project Name | Homelessness Prevention INTERFAITH |
| Target Area | City of Plymouth |
| Goals Supported | Homelessness prevention |
| Needs Addressed | Education, outreach and services. |
| Funding | CDBG: \$10,000 |

| | Description | Interfaith Outreach and Community Partners will provide direct assistance to clients within their Project Success program. The participants are expected to be working towards an educational degree or other goal within two years while paying 30% of their rent. |
|----|--|---|
| | Target Date | 6/30/2025 |
| | Estimate the number and type of families that will benefit from the proposed activities | Interfaith Outreach expects to help five families within their Project Success program. |
| | Location Description | The program is available to low- and moderate-income Plymouth households city-wide. |
| | Planned Activities | Interfaith Outreach & Community Partners will provide direct assistance to clients within their Project Success program. The participants are expected to be working towards an educational degree or other established goal within two years while paying 30% of their rent. |
| 10 | Project Name | Fair Housing |
| | Target Area | City of Plymouth |
| | Goals Supported | Fair Housing |
| | Needs Addressed | Education, outreach and services. |
| | Funding | CDBG: \$2,500 |
| | Description | Plymouth supports the Fair Housing activities of the Hennepin County Consortium and the Twin Cities Fair Housing Implementation Council (FHIC). Activities include outreach, education, and enforcement activities. The project includes evaluation and monitoring of implemented activities. |
| | Target Date | 6/30/2025 |

| | Estimate the number and type of families that will benefit from the proposed activities | Plymouth supports the Fair Housing activities of the Hennepin County Consortium and the Twin Cities Fair Housing Implementation Council (FHIC}. Activities include outreach, education, and enforcement activities. The project includes evaluation and monitoring of implemented activities. |
|----|--|---|
| | Location Description | N/ A - supports Fair Housing activities covering Hennepin County and the Twin Cities metropolitan area, including the City of Plymouth. |
| | Planned Activities | Plymouth supports the Fair Housing activities of the Hennepin County Consortium and the Twin Cities Fair Housing Implementation Council (FHIC}. Activities include outreach, education, and enforcement. The project includes evaluation and monitoring of implemented activities. |
| 11 | Project Name | Program Administration |
| | Target Area | City of Plymouth |
| | Goals Supported | Administration |
| | Needs Addressed | Education, outreach and services. |
| | Funding | CDBG: \$30,000 |
| | Description | Provides for: 1) Oversight, management, monitoring and coordination of the CDBG program. 2) Public information on CDBG Program activities available to all City residents. |
| | Target Date | 6/30/2025 |
| | Estimate the number and type of families that will benefit from the proposed activities | Funding provides for overall program administration of CDBG activities. |
| | Location Description | N/ A - funding provides for overall program administration of CDBG activities. |
| | Planned Activities | Program management, monitoring, and evaluation of overall CDBG program including costs of staff engaged in program management. |

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

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

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

Geographic Distribution

| Target Area | Percentage of Funds |
|------------------|---------------------|
| City of Plymouth | 100 |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Investments are not targeted geographically but are instead available to low/moderate income households city-wide. Investments are not targeted geographically because the City of Plymouth has no areas of concentrations of low/income or minority households nor any areas of concentrations of housing problems.

Discussion

The existing policy allows the City to serve as many low/moderate income households as possible by providing resources throughout all areas of the city.

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

Introduction

The City of Plymouth works whenever possible to assist with making housing affordable through programs offered by the City including the Rehabilitation and Emergency Programs for repairs, the First Time Homebuyer Program for new homeowners as well as through social service funding to assist with housing costs and maintenance. There are some challenges in providing affordable housing because of several factors. One factor is the insufficient availability of affordable housing units and the increase in the cost of living.

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

The City is addressing affordable housing barriers in a variety of ways including the support of new affordable housing developments. In February 2024 one developer received approval for a mixed-use apartment project, the developer will dedicate roughly 2/3 of the units will be affordable to households earning 80% of the area median income. In addition, the city will aid first time homebuyers with down payment assistance and partner with community land trust for purchases for approved buyers. Partner with sub grantees that provide tenant and homeowner education and support services, and rehabilitation assistance. The City is closely involved with researching and addressing impediments to fair housing. The City uses some of its CDBG funding to support HOME Line, a tenant advocacy and hotline organization. Finally, the City has a Tax Increment Financing (TIF): Program that offers funds to be used to provide a direct subsidy to a particular housing project or they can also be used to promote affordable housing by setting aside a portion of TIF.

The City will continue to support currently operating programs as well as participating in regional opportunities to address affordable housing issues. The City of Plymouth is committed to addressing these barriers through its inclusionary Housing policy which encourages developers to create affordable housing units and mixed-income projects citywide.

Discussion

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

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

Actions planned to address obstacles to meeting underserved needs

The City will continue to identify obstacles, such as lack of affordable housing, to unmet and underserved community needs and support the goals established in the 2020-2024 Consolidated Plan. The City's approach to meeting these affordable housing needs is to assist renters in purchasing homes by providing down payment and closing cost assistance combined with counseling and education for low to moderate income families. To preserve the affordable housing stock "Restrictive Covenants" have been placed on a number of new units built. These Restrictive Covenants run with the land for a period of 20 years and contain restrictions on the transfer of the property only to someone who is a low to moderate income resident. To preserve and expand the supply of decent, safe, and affordable housing, the City will provide financial assistance for rehabilitation and repair of owner-occupied units for low to moderate income families.

Additionally, the Housing and Redevelopment Authority recently updated its strategic plan. This plan represents a high-level view of the HRA's policy goals over the next five years, beginning in 2021, and will help guide the HRA, including actions to address obstacles to meeting underserved needs.

Actions planned to foster and maintain affordable housing

income home buyers to help maintain affordability over the long term. The City has fostered collaborations and provided funding through Community Development Block Grant (CDBG) to a variety

Annual Action Plan

of non-profit organizations that provide services such as advocacy to tenants, resources to prevent homelessness and home maintenance services to support independence and allow older adults to remain in their homes. One partner in particular, Hammer Residents provides affordable housing for vulnerable populations in Plymouth who have limited income. The HRA will continue to explore new opportunities for Naturally Occurring Affordable Housing (NOAH) programing to maintain existing affordable housing.

Actions planned to reduce lead-based paint hazards

The portion of 2024 CDBG funds allocated to the Housing Rehabilitation Program allows low-income homeowners to stay in current housing while allowing the City to maintain a stable affordable housing base. The City and HRA make every effort to create affordable rental and owner-occupied housing opportunities as well as provide provisions that new developments remain affordable for years to come.

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

Finally, depending on fund availability, assistance recipients may be referred to Hennepin County's Healthy Homes program, which offers up to \$10,000 in funding for lead paint detection and removal

Actions planned to reduce the number of poverty-level families

programs that provide items to families that may be experiencing poverty and need these items for basic living.

Actions planned to develop institutional structure

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

based paint hazards from the home while utilizing the CDBG funding to make other needed repairs, resulting in a greater impact to the living environment for the household.

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

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

The HRA requires recipients of their First Time Homebuyer Programs to attend homebuyer workshops presented by an accredited Home Stretch organization. At the end of the training period, the family is eligible to purchase the home.

Discussion

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

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

Introduction

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

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

| 1. The total amount of program income that will have been received before the start of the | |
|--|--------|
| next program year and that has not yet been reprogrammed | 80,000 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the | |
| year to address the priority needs and specific objectives identified in the grantee's strategic | |
| plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use | |
| has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 80,000 |

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% |

Discussion

Program Income (PI) is received through the repayment of deferred zero interest loans made in previous years through the First Time Homebuyer and Housing Rehabilitation programs. When PI is received it is typically immediately reprogrammed to support current First Time Homebuyer and Housing Rehabilitation loan activities (depending on where the need/activity is greatest at the time the PI is received). The receipt of PI is somewhat unpredictable as it is generally triggered when previous loan recipients sell or refinance their homes. All PI received to date has been reprogrammed to support First Time Homebuyer and Housing Rehabilitation activities. The HRA anticipates receiving and needing to reprogram approximately \$80,000. in PI before the start of the 2024 program year and will reprogram it to support projects during that program year. This estimate is based on PI received to date and checks yet to be cashed.

In addition, the HRA anticipates receiving approximately \$80,000 in Pl during the 2024 program year that will also be reprogrammed to support projects during the program year. This estimate is based on loan repayment trends over the past five years. Since several activities carried out by the HRA and social service agencies do not require immediate expenditure of the full amount of funds awarded, there will be a delay of several months between grant award and when a draw of funds will occur.

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

The HRA estimates that 100% of its CDBG funds will be used for activities that benefit persons of low and moderate income. This includes all of the HRA CDBG-assisted activities other than Program Administration (planning, management, monitoring, and evaluation of the overall CDBG program).