



City of Madison 2010-2014 3-5 Year Strategic Plan

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond to in order to be compliant with the Consolidated Planning Regulations.

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

3-5 Year Strategic Plan Executive Summary:

The City of Madison Community Development Division annually receives federal funds through the U.S. Department of Housing and Urban Development (HUD). The Division is required to develop a 5-Year Consolidated Plan to articulate the community development goals for the next 5 years to receive these funds. The duration of this plan is for the period January 1, 2010 through December 31, 2014. During this period, the City anticipates that the following Federal funds will be received:

Formula Grants

- Community Development Block Grant (CDBG)
- HOME Investment Partnership Program (HOME)
- Emergency Shelter Grants (ESG)

In addition to these funds, the City will administer State and local funds and Neighborhood Stabilization Program (NSP) funds as well as Federal stimulus money which will include the following: Department of Energy Block Grant (EECBG) funds, Community Development Block Grant (CDBG-R) funds and Homelessness Prevention & Rapid Re-Housing Program (HPRP) funds.

The funds will be used to meet the goals and objectives established and approved by the CDBG Committee and the Common Council. The following goals and objectives have been developed in consultation with citizens, services agencies, other funding partners, the Madison Metropolitan School District and businesses to provide decent housing, a suitable living environment and economic opportunities for low to moderate income households.

The Community Development Division will pursue these goals and objectives by working with the non-profit community, neighborhood groups, associated businesses, stakeholders, labor union representatives, other local government entities, residents and partners. The Division will also work closely with several other City agencies to jointly plan, implement and evaluate the program's core activities.

The City of Madison will strive to meet the following 5 goals and 11 objectives between 2010 and 2014. These goals are based on assumptions about future funding levels for the Consolidated Plan programs. Because these funding sources are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, the accomplishment projections and planned activities are subject to change with availability of funding.

Goals:

- Improve and expand affordable housing options.

Objectives:

- **Owner-occupied housing** – improve the quality of existing owner-occupied housing stock to support community and neighborhood stability and neighborhood revitalization efforts (i.e. housing made accessible, brought to code, or made safer or more energy efficient)
- **Housing for buyers** - increase homeownership opportunities for low to moderate income individuals through affordable homes constructed, rehab efforts or downpayment assistance
- **Rental Housing** – expand the number of affordable rental units and/or improve the quality and/or diversity of rental units available to lower income individuals throughout the community (i.e. renovated to code or made accessible, better managed and affordable)

- Expand businesses to create jobs and assist with the development of microenterprises.

Objectives:

- **Business Development and Job Creation** – assist businesses and non-profits to create new employment opportunities for low to moderate income individuals which meet wage standard levels or create training or advancement opportunities, with 51% being low to moderate income
- **Economic Development of Small Businesses** – Assist micro-enterprises which are the principal occupations of their owners, or which create new job opportunities for low or moderate income persons through technical and/or financial assistance

- Strengthen neighborhoods through the operation of neighborhood centers, community gardens and the implementation of strategic neighborhood revitalization efforts.

Objectives:

- **Improvement of community focal points: Gardens and Neighborhood Centers** – create, enhance or sustain the operation of neighborhood centers and community gardens that bring people of diverse backgrounds together, serve as neighborhood focal points, or provide residents with skills or opportunities that will lead to stronger neighborhood
- **Revitalization of strategic areas** – through the neighborhood planning process assist residents of designated neighborhoods in identifying opportunities and promoting sustainable neighborhood revitalization

- Increase the access of low and moderate income households and community groups to resources through the improvement of community service facilities, enhancement of informational services and employment training opportunities.

Objectives:

- **Improvement of services to homeless and special populations** – stabilize or improve the housing situation of homeless individuals or near-homeless individuals, and develop supportive activities
- **Physical improvement of community service facilities** – create or improve, safe, energy-efficient, accessible and well-maintained community and neighborhood facilities
- **Expansion of individual choice and access to housing resources and employment and training opportunities** – increase access to housing, information and other non-monetary resources and support for employment and training opportunities

- Administer the Community Development program to meet the community needs and funder requirements.

Objectives:

- **Overall program administration** - develop, guide and manage activities which generate long term impact and self-sufficiency, including the provision of fair housing services. Achieve National and local cross-cutting objectives

FINAL DRAFT

**2010-2014 Goals, Objectives, Outcomes
and Estimated Funding Sources and Amounts**

<i>Objectives</i>	<i>Outcomes</i>	<i>Estimated Funding Source and Amount</i>
Goal: Improve and expand affordable housing options		
(A) Owner-occupied housing	1,127 total repairs/rehabs (1,000 minor and 127 major repairs/rehabs)	CDBG = \$385,402 HOME = \$2,487,208 Other = \$404,935
(B) Housing for buyers	360 properties	CDBG = \$1,430,832 HOME = \$3,968,254 Other = \$1,789,959
(D) Rental Housing	772 rental units created or improved	CDBG = \$1,368,825 HOME = \$3,788,994 Other = \$2,420,143 ESG = \$148,723
Goal: Expand businesses to create jobs and assist with the development of microenterprises		
(E) Business Development and Job Creation	235 FTE positions	CDBG = \$6,084,716 Other = \$972,559
(F) Economic Development of Small Businesses	116 microenterprises assisted	CDBG = \$407,355
Goal: Strengthen neighborhoods through the operation of neighborhood centers, community gardens and the implementation of strategic neighborhood revitalization efforts		
(G) Improvement of community focal points	147,682 individuals	CDBG = \$1,948,691 Other = \$2,481,734
(L) Revitalization of strategic areas	15 neighborhoods	CDBG = \$772,710
Goal: Increase the access of low and moderate income households and community groups to resources through the improvement of community service facilities, enhancement of informational services and employment and training opportunities		
(J) Improvement of services to homeless and special populations	20,074 households	CDBG = \$163,466 Other = \$1,570,137 ESG = \$234,955
(K) Physical improvement of community service facilities	10 buildings	CDBG = \$2,026,592
(X) Expansion of individual choice and access to housing resources and employment and training opportunities	14,530 people	CDBG = \$94,000 Other = \$321,881 ESG = \$20,507
Goal: Administer the Community Development program to meet the community needs and funder requirements		
(Z) Overall program administration	700 contracts	CDBG = \$1,866,582 HOME = \$1,039,548

		Other = \$389,042 ESG = 21,247
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Past Performance

The City of Madison continually strives to improve the performance of its operations and those of its funded agencies. In 2008, the Community Development Division invested \$11.7 million in the community to meet the goals and objectives outlined in the 2005-2009 Consolidated Plan. CDBG, HOME and ESG funds were primarily targeted toward affordable housing, economic development and development of neighborhood focal points. The chart on page 61 shows the use of these funds in relation to each objective. For a more detailed summary of the City’s evaluation of past performance, previous Consolidated Annual Performance and Evaluation Reports (CAPER) can be viewed on the City’s website at www.cityofmadison.com/cdbg.

Strategic Plan

Due every three, four, or five years (length of period is at the grantee’s discretion) no less than 45 days prior to the start of the grantee’s program year start date. HUD does not accept plans between August 15 and November 15.

Mission

The mission of the community development program is to help make Madison “a more viable urban community by providing decent housing, a suitable living environment and by expanding the economic opportunities for low and moderate-income persons.”

Community Development Strategies

For 2010-2014, the Community Development Division and CDBG Committee have developed 5 major goals, 11 objectives and 5 implementation strategies. Over the next 5 years, there will be an emphasis on incorporating energy efficiency and sustainability initiatives into all eligible projects. In addition, economic development, job creation and employment and training will be emphasized within the major goals and objectives. The Division will explore targeted economic development strategies relating to small businesses, particular sectors, “green” jobs and will investigate other strategic approaches to include economic gardening. The Division will also be committed to producing quality employment options for the full spectrum of Madisonians.

The Division and the CDBG Committee will continue to identify and discuss emerging needs in the City of Madison. New and alternative approaches to meet these needs within the established goals and objectives will be considered.

The Community Development Division will continue to work to increase coordination and collaboration with other entities engaged in related activities, wherever that coordination and collaboration enhances the CDBG initiatives and will support compatible efforts by other groups and associations. The Division will work with service providers, other funders, the Madison Metropolitan School District, other City of Madison departments, labor union representatives, businesses, Dane County and the State of Wisconsin to more efficiently deliver the City of Madison Community Development program.

The CDBG Committee has primarily funded non-profit agencies to provide direct services to City of Madison residents. Over the next 5 years the CDBG Committee will discuss the role that for-profit businesses may play in achieving the stated goals and objectives.

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Objectives:

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- Administer the Community Development program to meet the community needs and funder requirements.

Objectives:

- **Overall program administration** - develop, guide and manage activities which generate long term impact and self-sufficiency, including the provision of fair housing services. Achieve National and local cross-cutting objectives.

Strategies:

The City of Madison has developed the following Community Development strategies:

- Fund activities for long-term impact upon Madison’s neighborhoods and low- and moderate-income individuals. Many activities are designed to integrate lower income and higher income households rather than focus exclusively on very low-income households, based on the belief that all can contribute to the health of the City of Madison’s future.
- Assist activities that often operate within a market or quasi-market environment, such as assisted housing, business development or neighborhood district revitalization, where the program participant shares the responsibility for the costs and the shape of the actual product or program.
- Focus upon activities that are “developmental” in nature and are either capitalized costs, or operating costs (related to community gardens, neighborhood centers or information resources). In some of our most effective activities, we have provided an agency with the assets and information to develop a service that in turn establishes a source of future revenue to the agency while serving a public benefit.
- Generally provide investment funding and other assistance to other organizations at the “wholesale” or system-wide level of operations, rather than manage programs that directly assist individual households. However, the Division will take an active role in the direction of these operations and make sure they are consistent with the overall needs and interests of the City of Madison. The Office does administer a downpayment assistance program directly to households as a way to effectively coordinate the various City housing programs.
- Combine and coordinate resources in the Community Development Division and within the City overall. In addition, continue and expand the Division’s relationships with other local governments, private non-profits, businesses, stakeholders and other organizations.

The CDBG Office does not generally fund operating costs, unless they are part of a capital project or are related to community gardens, neighborhood centers, services to homeless populations or the provision of information and access to housing, including fair housing services. An example of this strategy is the use of the American Dream Downpayment Initiative (ADDI) funds where the City is able to use direct assistance to better integrate the development of affordable housing stock with the targeted use of ADDI funds.

General Questions

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.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)). Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
3. Identify any obstacles to meeting underserved needs (91.215(a)(3)).

3-5 Year Strategic Plan General Questions response:

Geographic Area

The City of Madison is part of a dynamic and growing region, is the seat of the State of Wisconsin and Dane County government, and has more than 100 very active neighborhood, business and community organizations. Madison is also home to the University of Wisconsin, a nationally respected research institution known for a tradition of academic excellence. The City includes parts of three lakes, and is located upon an isthmus, which gives the City its defining geographical characteristics.

Population

As of the 2000 census, Madison had a population of 208,054. Its 2007 estimated population was 222,725 making it the second largest city in Wisconsin, after Milwaukee.

In 2000, slightly over 48% of residents of the County lived in the City of Madison. According to the Wisconsin Department of Administration, Madison is expected to add 20,100 households which is a 23% increase between 2000-2015.

Economic Conditions

Madison is losing economic ground compared to the balance of Dane County. In 2000, the County median income was 17% higher than Madison's. In 2007, Dane County's median income was 19% higher with Madison's median income at \$50,991 and Dane County's at \$60,791. Median household income in Madison is only slightly above state (\$50,578 in 2007) and national levels (\$50,233 in 2007).

The poverty rate in Madison continues to rise from a rate of 15% in 2000 to a rate of 18.5% in 2007. This compares to the county rate of 9.4% in 2000 and 10.9% in 2007.

Approximately 47.3% of the people of Madison have incomes at or below 80% of the county median income. This compares to Dane County which has 33.8% LMI persons. LMI individuals are scattered throughout the city. CDBG Target Area census tracts where 51% of the individuals meet the HUD low/moderate income standards of 80% or less of the area median income are labeled Target Areas and identified on the map on page 62.

Although the income of households in the City of Madison is only slightly above the State's, the median house or condo in 2007 was priced at \$215,800 compared to the state at \$168,800. Median gross rent in the city for 2007 was also much higher than the state, with Madison at \$814/month versus the state at \$673/month. This combination of average income and higher housing costs highlights the difficulty that lower income individuals have in securing affordable housing in Madison. Of the households at less than 50% median income, 68% report a housing cost burden greater than 50%. 88% of these are renters and 12% home owners.

2007	
State of Wisconsin Median Income	\$50,578
City of Madison Median Income	\$50,991
State of Wisconsin Median Price of House or Condo	\$168,800
City of Madison Median Price of House or Condo	\$215,800
State of Wisconsin Median Gross Rent	\$673/Month
City of Madison Median Gross Rent	\$814/Month

The numbers of households on public assistance has increased dramatically over the past year highlighting the need for affordable housing, jobs and support services.

Dane County W-2 Caseload:

	Jan.	Feb.	Mar.	April	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
2007	348	356	344	357	372	354	357	385	402	425	432	404
2008	382	371	348	354	339	356	342	383	389	411	413	406
2009	370	417	447	494	532	558	596					

Dane County Food Stamps (Food Share) – Unduplicated Recipients:

	Jan.	Feb.	Mar.	April	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
2007	9,335	9,371	9,417	9,543	9,547	9,584	9,642	9,764	9,866	10,026	10,102	10,069
2008	10,216	10,544	10,796	11,151	11,429	11,700	11,893	12,146	12,307	12,725	13,080	13,287
2009	13,683	14,117	14,633	15,257	15,791	16,197						

Wisconsin state government and the University of Wisconsin-Madison are the top two Madison employers. However, Madison's economy today is evolving from a government-based economy to a consumer services and high-tech base. Since 1981, jobs outside of education and government have grown from 66% to 80% of the city's economy.

Although area jobs are still concentrated within Madison, the balance of the county is gaining. In 1980, Madison had 79% of the jobs within the county. Today it has 70%.

Madison has been insulated from the extreme unemployment rates due to stable job opportunities with the University and state government. Madison's unemployment rate has grown from 5% in 2007 to 6.6% in 2009. This is compared to the national average of 9.7% in 2009.

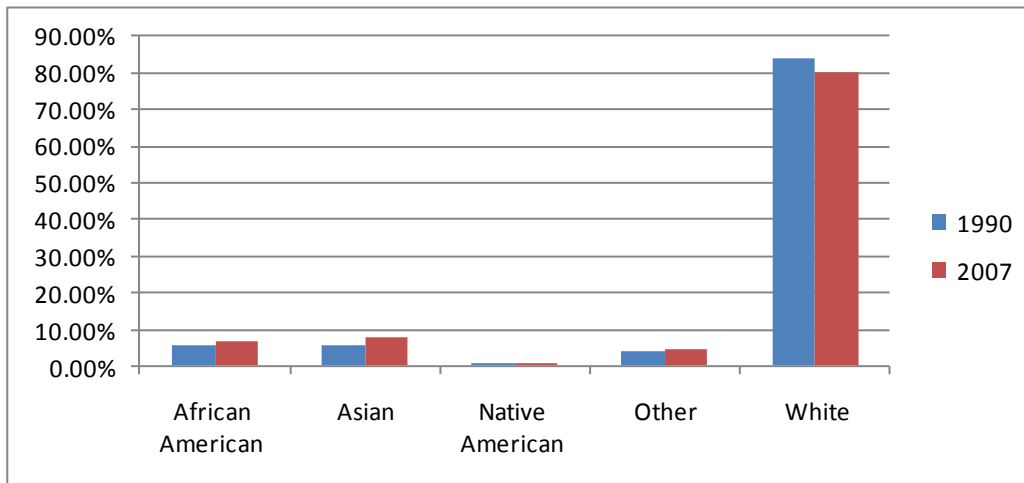
Age

9.2% of Madison's population is over age 65 and 20.9% is in the baby boomer years of 45-64. These statistics have remained fairly constant with 9.2% over age 65 and 19.3% age 45-64 in 2000. The median age has remained constant from 2000 to 2007 at 30.6 years. This is a unique difference from the county as a whole which tends to see the population aging. Dane County had a median age of 33.2 in 2000 increasing to 35 in 2007. Madison's median age is also much younger than the remainder of the state, with the state median age of 36.

Race, Ethnicity

The City has grown more diverse in terms of its race and ethnicity. In 1990, 84% of the population was white, 5.8% African American, 5.8% Asian, .36% Native American and 4.04% Other. 4% of Madison residents identify as ethnically Hispanic. In 2007, 79.9% were white, 6.8% African American, 8.1% Asian, .5% Native American and 4.8% Other. 6.8% of Madison residents identify as ethnically Hispanic. With the increase in diversity in Madison, there has been a corresponding need for a variety of language needs and access to services.

City of Madison Racial Distribution in 1990 and 2007



Note: In 1990, 4% of Madison residents identified themselves as ethnically Hispanic
 In 2007, 6.8% of Madison residents identified themselves as ethnically Hispanic

Disability Status

In Madison, 20,771 individuals who are over the age of 5 live with a disability. This includes 7.3% between the ages of 5-64 and 2.7% over age 65.

Persons with AIDS/HIV

According to Avert, an international AIDS charity, in 2007 Madison had 554 AIDS cases. Wisconsin has 2,296 persons with AIDS and 2,432 persons living with HIV.

Demographic Information

The table on the following page summarizes general, economic, social and housing characteristics as presented in both the 2000 Census and the 2007 American Community Survey.

CITY OF MADISON SELECTED DEMOGRAPHICS	2000 Census	2007 ACS
POPULATION		
Total population	207,525	222,725
18 and over (%)	82.1%	81.2%
65 and over (%)	9.2%	9.2%
RACE		
White (%)	84.3%	79.9%
Black or African American (%)	5.6%	6.8%
American Indian and Alaska Native	0.4%	.5%
Asian (%)	5.6%	8.1%
Native Hawaiian and Other Pacific Islander (%)	0.08%	0.02%
Some other race (%)	1.6%	2.3%
Two or more races (%)	2.4%	2.3%
Hispanic or Latino of any Race (%)	4.2%	6.8%
AGE		
Under 5	10,815	13,574
18 years and over	170,793	180,843
45 years - 64 years	40,142	46,675
65 years and over	19,184	20,469
Median age (years)	30.6	30.6
HOUSEHOLDS		
Total households	89,019	88,656
Family households (%)	47.7%	47.8%
Married-couple family (%)	37%	37.8%
Female householder, no husband present (%)	7.8%	7.2%
Householder living alone (%)	35.4%	39.0%
Households with individuals under 18 years (%)	22%	23.9%
Households with individuals 65 years and over (%)	21.6%	15.4%
Average household size	2.2	2.4
Average family size	2.87	3.2
HOUSING UNITS		
Total housing units	92,353	103,285
Median Value of owner-occupied units (\$)	137,700	215,800
Gross rent for renter-occupied unit (\$)	644	814
Owner occupied (%)	47.8%	55.0%
Renter occupied (%)	52.2%	45.0%
EMPLOYMENT STATUS (16+)		

CITY OF MADISON SELECTED DEMOGRAPHICS	2000 Census	2007 ACS
Employed (%)	95.1%	95%
Unemployed (%)	4.8%	5%
In Armed Forces (%)	0.09%	0.05%
INCOME		
Median Household income (\$)	41,941	50,991
Median family income (\$)	59,840	73,049
Per capita income (\$)	23,498	27,728
Median earnings for Male full-time, year-round (\$)	36,718	44,564
Median earnings for Female full-time, year-round (\$)	30,551	38,665
DISABILITY STATUS		
Populations 5 years and over with a disability (%)	13.5%	10%
POVERTY STATUS		
Individuals below poverty level (%)	15%	18.5%
Families below poverty level (%)	5.8%	9.2%
EDUCATIONAL ATTAINMENT (25+)		
High school graduate or higher (%)	92.4%	93.9%
Bachelor's degree or higher (%)	48.2%	50.4%

Geographic Areas of Investment

The City has chosen to describe its goals and objectives primarily in terms of the functional components of a well-developed community: providing affordable housing, growing businesses with jobs, providing opportunities that expand neighborhood cohesion and stability, and focused neighborhood revitalization efforts. Allocations are typically used to address high priority needs, as identified in this plan, on a citywide basis for a project primarily benefiting low and moderate income households.

Although these activities do not provide an area benefit per HUD regulations, they often do succeed in addressing the challenges of low-moderate income neighborhoods in Madison by providing affordable housing, public facilities and improved and increased availability of public services for the area's residents.

However, the City does intend to prioritize and allocate a small portion of its funds to activities that seek to improve neighborhoods within the CDBG target areas. These efforts will focus on the Neighborhood Revitalization objective within the plan.

The Neighborhood Revitalization Program targets neighborhoods with high concentrations of low and moderate income persons for a special planning and project development process which it calls the concentration area process. The CDBG Committee, using census tract data, such as number of LMI individuals, race, ethnicity, age and housing tenure selects neighborhoods for this process. The process involves a three-year period for each neighborhood with the first year involving close work with a neighborhood association and a planning committee composed of representatives of the area. This planning committee works closely with the support of a CDBG-funded City planner to identify the neighborhood's needs and develop a neighborhood plan. This planning phase is followed by two years of active funding by the City, a process which encourages the development of

neighborhood activity and rewards the hard work and commitment of neighborhood residents in their considerations of neighborhood needs.

Census Tracts where 51% of the individuals meet the HUD low/moderate income standards of 80% or less of the area median income are identified as target areas on the map on page 62.

Identify any obstacles to meeting underserved needs (91.215(a)(3))

All needs will not be met due to the limited amount of CDBG and other grant funding available. In addition to the limited resources, regulations that control these resources often add to the cost and complexity of project administration. Supporting a project with multiple fund sources increases the complexity and reduces flexibility.

Managing the Process (91.200 (b))

1. *Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.*
2. *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.*
3. *Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.*

**Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.*

3-5 Year Strategic Plan Managing the Process response:

Lead Agency

The City of Madison has designated the Community Development Block Grant (CDBG) Office within the Community Development Division as the lead agency for the grant administration of the CDBG, HOME, ESG, NSP, CDBG-R and HPRP programs. The CDBG Committee serves as the lead policy body overseeing the development of the neighborhood and community development plan and programs. These two entities work with numerous community-based organizations and their partners, businesses, other funders and City of Madison departments to plan, develop, implement and evaluate activities covered in this plan.

Consultation and Other Agency Involvement

The Community Development Division, in coordination with the CDBG Committee, developed the Consolidated Plan with consultation from diverse groups and organizations. Throughout these discussions several themes emerged which lead to the development of the goals and objectives outlined in the plan. Affordable housing for renters and buyers, job creation, employee and business development, access to resources, and community focal points (i.e. neighborhood centers, community gardens) were identified as current and emerging needs in the City of Madison. In addition, the need for continued coordination and collaboration between agencies, local governments, other funders, other City agencies and the schools was also discussed. For further comments on the consultation and other agency involvement in the development of this plan please view the Synopsis of Citizen Comments located on page 47.

The CDBG Office regularly participates and coordinates with other funders such as United Way and Dane County and service groups in the community. The CDBG Office regularly meets with groups including the Homeless Service Consortium, Third Sector Housing, Home Buyers Round Table, and various City ad hoc committees, such as the Community Gardens, Housing, Civil Rights, Planning, Economic Development and Community Services Committees to improve methods of delivery and initiate systematic improvements in certain service sectors. The CDBG Office is also in regular contact with the Community Development Authority (CDA).

Citizen Participation (91.200 (b))

1. *Provide a summary of the citizen participation process.*
2. *Provide a summary of citizen comments or views on the plan.*
3. *Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.*
4. *Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

**Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.*

3-5 Year Strategic Plan Citizen Participation response:

The CDBG Committee serves as the main citizen participation resource for the community development program. The Committee is the lead policy decision making group for the overall program and involves citizens, community groups, non-profit agencies and businesses in the planning, selection and evaluation of the overall program.

The CDBG Committee meets monthly and provides time within its meetings for public comments and presentations. The Committee annually holds at least two public hearings to assess the overall progress of its investment program, and to hear about future and emerging needs within the community.

The CDBG Committee and Office have initiated several efforts to broaden the outreach and participation of various community groups in the neighborhood and community development program. Two public hearings related to the development of the 5-Year Plan were held in neighborhoods with high concentrations of lower income households including people of diverse races and ethnicity. The draft Plan is available for review in all public libraries and in neighborhood centers, which are frequented by minority and lower income persons as well as by people with disabilities. The CDBG Office also has integrated efforts to broaden outreach and participation of various groups into the operations of the CDBG program as follows:

- The Office operates an extensive website at www.cityofmadison.com/cdbg to report on five year goals, annual projects and special issues. The site includes a means to directly comment on any aspect of the Plan or the program.
- The Office advertises in the community newspapers and in specific housing and business development issues.
- The Office serves on 5 neighborhood resources teams, and periodically solicits comments on emerging community needs and suggested solutions from these teams that include both City staff and community members.
- The Office participates in various groups such as the Park Street Partners, a broad coalition of business, resident, institutional, and public groups that helps coordinate and promote revitalization activities in South Madison.
- The Office regularly consults with community and business groups to better understand emerging community needs and effective strategies.
- The CDBG Committee holds their monthly meetings in the community (i.e. Warner Park Community Center, Meadowood Neighborhood Center).
- The Office frequently meets with service providers in the community.
- The Office meets with a broad range of organizations that serve underrepresented populations (i.e. La Sup).

The Citizen Participation Plan and Citizen Comments on this plan can be found on pages 51 and 47, respectively, of this document.

Institutional Structure (91.215 (i))

1. *Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.*
2. *Assess the strengths and gaps in the delivery system.*
3. *Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the Committee Members or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.*

3-5 Year Strategic Plan Institutional Structure response:

The Community Development Division participates in a number of funder coordination groups, various service delivery groups, some general groups focused on certain geographical areas and with developers and businesses. The Division will primarily invest in activities administered by non-profit agencies. During the next 5 years, the CDBG Committee will explore the possibility of utilizing for-profit businesses to assist in achieving the goals and objectives in the Community Development program.

Funding is administered through a two-year funding process that was developed several years ago between the City of Madison Community Development Division, Dane County and United Way. This collaborative funding process has continued to evolve and has increased efficiencies for both funders and agencies. Agencies can now apply for funds for a two year period of time. Funders work collaboratively throughout the process to strengthen other components of program evaluation and delivery. In addition, the funding group has produced joint community needs assessments, sector-specific technical assistance, and coordination studies over the years.

The CDBG Committee makes the final funding recommendations to the Common Council. Once the funding recommendations are approved, the Community Development Division develops contracts with the funded agencies. The contract details the expectations, timetables, outcomes and regulation requirements.

The Community Development Authority (CDA), which serves as the lead public housing agency and administers both the public housing program and the housing voucher program, is an independent quasi-public agency with a board appointed by the Mayor. It contracts with the City for all of its staffing needs, including its Executive Secretary position who is also the City's Director of Planning and Community and Economic Development. The City has designated the CDA as the oversight administrative body for some of the City-funded rehabilitation and development loan programs. The Director of Public Housing meets weekly as part of the management group of the Department to share information and coordinate activities.

Monitoring (91.230)

Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

3-5 Year Strategic Plan Monitoring response:

The Community Development Division will ensure that all activities carried out to implement the Consolidated Plan comply with the requirements of the CDBG, HOME, ESG and other funding sources as required as well as achieve their performance objectives on schedule and within the prescribed budget.

Each agency allocated funding from the City of Madison will submit an application which is formalized through a contract which outlines all requirements, regulations, procedures and accomplishments. The agency will submit progress reports on a quarterly basis at a minimum. The specific reporting periods will be established with the contractual process. Reports will be reviewed for contract compliance with all regulations including administrative, financial and programmatic operations. Timely expenditure of funds will be reviewed on a continual basis to ensure compliance with program regulations. Individual meetings with the agency will occur as necessary to respond to questions or assess project progress. Depending upon the complexity of the project and the funding requirements, the City may provide orientation training and technical assistance to help improve successful completion of the project.

In addition to the monitoring requirements for each funding source, the Community Development Division staff will make at least one monitoring visit on-site on selected higher risk projects to monitor compliance with fiscal, programmatic and regulatory controls and requirements. High-risk recipients include those that are new to the Community Development program, those with past difficulties in implementing a project and those with a significant funding allocation.

The Community Development Division along with the Community Development Block Grant Committee will serve as the lead in the recording, monitoring and evaluating the City's progress in achieving the goals and objectives outlined in this plan. Presentations, updates, status reports are presented at monthly Committee meetings.

Priority Needs Analysis and Strategies (91.215 (a))

- 1. Describe the basis for assigning the priority given to each category of priority needs.*
- 2. Identify any obstacles to meeting underserved needs.*

3-5 Year Strategic Plan Priority Needs Analysis and Strategies response:

The Community Development Division had discussions with various stakeholders, partners, funded agencies, citizens and community groups to determine the priorities of the Community Development program. In addition, the CDBG Committee addressed these priorities throughout the development of the 2009-2010 Framework.

Although many high priority issues were identified such as education, safety and transportation it was determined that other City departments or community groups may be more appropriate to address the indicated need because of mandates or specific resources available to meet the need. Given this, it was determined that the Community Development program should continue to focus on areas that are critical to the overall goal of developing and maintaining a viable urban community. The Community Development program will continue to emphasize the following major goals for the next five years:

- Improve and expand affordable housing options.
- Expand businesses to create jobs and assist with job growth and the development of microenterprises.
- Strengthen neighborhoods through the operation of neighborhood centers, community gardens and the implementation of strategic neighborhood revitalization efforts.
- Increase the access of low and moderate income households and community groups to resources through the improvement of community service facilities, enhancement of informational services and employment and training opportunities.
- Administer the Community Development program to meet the community needs and funder requirements.

Lead-Based Paint (91.215 (g))

1. *Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.*
2. *Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.*

3-5 Year Strategic Plan Lead-Based Paint response:

The City estimates that there are 66,544 dwelling units within the community that were built prior to 1979, and that 95% of these contain at least some level of lead paint. It should be noted that not all units containing lead paint pose a lead paint hazard. Since many of these dwelling units are relatively well-maintained, the City estimates that only 5% (or 3,200 structures) of these contain lead hazards, and that over 80% (2,500) of these structures would be occupied by income-targeted families.

The City expects to use the following strategies to evaluate and reduce lead-based paint hazards:

- Inform families with young children about the dangers of lead-based paint hazards and steps to reduce those hazards.
- Coordinate public health services and screening with referrals to home repair, lead reduction, and rehabilitation programs.
- Enforce a local ordinance designed to reduce lead paint hazards.
- Continue to allow a higher per unit subsidy for projects that involve lead paint reduction.
- Monitor federally funded rehabilitation projects for compliance with Federal standards.

HOUSING

Housing Needs (91.205)

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

1. *Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families).*
2. *To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.*

3-5 Year Strategic Plan Housing Needs response:

General Estimated Needs and Services for 2010-2014

According to the 2007 American Community Survey, there were 103,285 housing units in the City of Madison for a population of 228,754 composed of 88,656 households. This is a housing unit growth rate of 11% since 2000. There is anticipation that the need for additional housing units will continue to grow for 2010-2014 however given the changes in the economy this need will require further evaluation as more recent data becomes available.

City of Madison 2010-2014

3-5 Year Strategic Plan

Categories of Persons Affected

The following snapshot provides some indication of income distribution and race/ethnicity for Madison households. These figures would seem to indicate that Asian, African American, and Hispanic households may experience the most severe housing cost burdens.

According to the 2000 census, the total number of households in Madison was 89,019. 13,749 had incomes 30% or less; 10,527 had incomes between 30% and 50% of area median income (AMI); 17,809 had incomes between 50% and 80% of AMI; 46,013 had incomes more than 80% of AMI.

In 2000, 5.6% of the population were African American, 5.6% Asian and 4.2% Hispanic. Each race/ethnicity category increased in population from 2000-2007. In 2007, 6.8% of the population were African American, 8.1% were Asian and 6.8% Hispanic.

HOUSING PROBLEMS		
ALL HOUSEHOLDS	% of all City of Madison households experiencing some housing problems (defined by HUD as substandard housing or paying more than 30% of income for housing costs)	34%
HOUSEHOLDS UNDER 30% OF AMI	% of households under 30% of AMI experiencing housing problems	86%
	<i>% African Americans under 30% AMI experiencing housing problems</i>	87%
	<i>% of Hispanics under 30% AMI experiencing housing problems</i>	93%
	<i>% of Asians under 30% AMI experiencing housing problems</i>	78%
HOUSEHOLDS BETWEEN 30-50% OF AMI	% of households between 30-50% of AMI experiencing housing problems	72%
	<i>% African Americans between 30-50% of AMI experiencing housing problems</i>	71%
	<i>% of Hispanics between 30-50% of AMI experiencing housing problems</i>	80%
	<i>% of Asians between 30-50% of AMI experiencing housing problems</i>	80%
HOUSEHOLDS BETWEEN 50-80% OF AMI	% of households between 50-80% of AMI experiencing housing problems	35%
	<i>% African Americans between 50-80% of AMI experiencing housing problems</i>	20%
	<i>% of Hispanics between 50-80% of AMI experiencing housing problems</i>	43%
	<i>% of Asians between 50-80% of AMI experiencing housing problems</i>	49%*

*Indicates a disproportionately greater burden than the income group as a whole

Source: 2000 Census data

Race/Ethnicity

According to the 2000 census data, race and ethnicity appear to influence opportunities and housing tenure patterns. 93% of Hispanic households and 87% of African American (non-Hispanic) households under 30% of AMI had housing problems, compared to 86% of the entire population under 30% AMI. In addition, there is a disproportionate percentage (considered 10% or greater than the income group as a whole) of the Asian population with incomes between 50-80% AMI experiencing housing problems.

Renters and Owners

In 2007, 45.1% of the housing units in the City were rental and 54.9% were owner occupied. For rental property there was 5% vacancy rate while for owner occupied that was a 1% vacancy rate.

Elderly Population

The number and proportion of elderly households continues to grow. In 1990, 23,754 persons were 60 years and older; in 2000, 24,832 persons were 60 years or older and in 2007, 28,282 persons were 60 years or older.

Larger Families

In 2007, there were 4,782 larger family renters. This constitutes 5% of the total households in Madison. 3% of all family renter households below 51% AMI are categorized as large families of 5 or more persons. 1.7% of all renter households below 51% AMI are categorized as large families.

Disabled Population

National estimates indicate that one in ten persons may be classified as a person with disabilities. The 2007 data shows that 20,538 people within the City of Madison live with physical or developmental disabilities and are in need of some form of supportive housing or services. 75% of the households with income of 30% or less AMI and reporting a mobility impairment experienced housing problems.

Domestic Violence

The Dane County District Attorney's Office had 3,000 domestic violence complaints in 2008. Of the families that go to shelters, 36% have had a threat of violence or violent acts are present. Of the single women that go to shelters, 23% have had a threat of violence or violent acts are present.

Cost Burden

The Housing Needs Table illustrates an analysis of severe cost burdens. It suggests that based on the 2000 census data over 55% of owners and 68% renters with incomes less than 30% of median carry housing cost burdens of over 50% of income.

Overcrowding

The City of Madison has developed a local definition of "substandard" based upon the assessed value of the building and the square footage of the improvements. Using this definition, staff estimates that over 4,000 rental units and 3,000 owner housing units were "substandard", with 99% suitable for rehab.

The 2007 figures suggest that 2,087 housing units have more than one person per room compared to 3,103 in 2000.

Persons with HIV/AIDS

As of 2005, the ASN/Care Consortium reported that there were over 700 reported cases of HIV disease and 400 reported cases of AIDS within the 13 county South Central Wisconsin region, which includes Madison. This service area constitutes about 20% of the documented AIDS cases in Wisconsin.

The Madison AIDS Network provides case management and support services to individuals and their families. Client income data indicates the 73% of clients have incomes less than 200% of federal poverty, with 55% of clients at or below 100% of poverty. Madison AIDS Network reports that many of their clients find themselves in repeated housing crises as they continue to be unable to access Section 8 housing, or are adversely affected by tremendous decreases in their financial resources and limited affordable and safe options for housing options. Individuals express fear and uncertainty in attempting to access traditional housing services as they worry about confidentiality and fear of discrimination.

Priority Housing Needs (91.215 (b))

1. *Identify the priority housing needs and activities in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.*
2. *Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.*

Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

3. *Describe the basis for assigning the priority given to each category of priority needs.*
4. *Identify any obstacles to meeting underserved needs.*

3-5 Year Strategic Plan Priority Housing Needs response:

The Community Development Division reviews census data and descriptive materials on housing trends to identify several priority areas within the larger group of people with housing problems. The CDBG Committee has traditionally placed a high priority on serving the needs of people already in housing, in order for them to retain their housing and prevent eviction or frequent moves that contribute to family issues and destabilization. Frequently, this means helping those elderly homeowners and family households in the 50% of AMI and under range. The Committee has also placed a high priority on those households in the 50% to 80 % of AMI range who currently rent, that with some assistance, could possibly purchase homes and stabilize their housing situations. While the CDBG Committee acknowledges the severity of housing needs for all households with income below 50%, the Committee also recognizes the availability of such programs as public housing and housing choice vouchers to provide some level of assistance to those renters in that income range. The Committee has also placed a priority on individuals with incomes less than 50% and who need rental housing.

Housing Market Analysis (91.210)

**Please also refer to the Housing Market Analysis Table in the Needs.xls workbook.*

- 1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.*
- 2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).*
- 3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes.*

3-5 Year Strategic Plan Housing Market Analysis responses:

The 2000 Census counted a total of 92,353 occupied year-round housing units within the City of Madison, compared to 81,891 in 1990. 25,036 dwelling units or 25% were 0 to 1 bedroom units; 28,632 or 31% were 2-bedroom units; 29,527 units or 32% were 3 bedroom housing units. Of these 17.69% were one-unit detached structures and 6% were two-unit structures.

The overall vacancy factor in 2000 was 4% compared to 5.5% in 1990. Despite areas of higher vacancy, where some apartment complexes are experiencing as much as 40% vacancy rates, this trend of relatively low vacancy continues to maintain a tighter housing market where good, safe, affordable housing is scarce, and housing costs are increasing. Experience since the 2000 census period suggests that low interest rates and newer high-density apartment structures close to the University campus have caused a softening in the rental market. This has not yet resulted in lower rent rates, but has produced some additional spot vacancy trends in certain neighborhoods, and special rebates for longer term renters.

In 2000, a HUD sponsored special census study found the following trends in affordability:

Housing problems experienced by households related to housing quality (age and condition), cost (contract rent or mortgage and interest costs), and crowding (number of persons per bedroom). The 2000 study indicated that households, or almost 33.8% of Madison households, experience some sort of housing problem, the predominant one that of cost. Roughly 92,130 people in Madison are members of a household with incomes of 80% or less than the area media income (AMI). This represents almost 48% of all persons in the Madison area.

One of the contributing factors to the supply of affordable housing within Madison is the effect of the student population on the housing market. Their relatively greater purchasing power, their concentration in older neighborhoods within the community near the campus, and their direct competition for certain housing types, which may also be sought by larger families, creates a housing market that places lower income families with children at a competitive disadvantage, particularly within the broader Madison Isthmus area.

The CDBG Committee and other public and private housing funding groups within the area have observed the characteristics of the Madison area market and have responded to some of its special characteristics with innovation and revised housing strategies. Over the last ten years, the City has seen the rise of a downtown condo market, with successful sales that are transforming some of the older downtown neighborhoods, such as Bassett and First Settlement. The City has seen the construction near the campus of denser, higher rise buildings to meet the needs of University students, a trend that may open opportunities for renovation of older housing units in neighborhoods where these students formerly resided. In addition, the development community, aided by the City and lenders, has planned and developed more infill and Greenfield plats that emphasize a traditional neighborhood approach to design, with a great mixture of housing types, friendlier pedestrian-oriented streets and paths, and more attention to civic or neighborhood identification features, such as parks, schools, libraries or lake and vistas.

Jurisdiction		Complete cells in blue.				
Housing Market Analysis						
Housing Stock Inventory						
Affordability Mismatch	Vacancy Rate	0 & 1 Bedroom	2 Bedrooms	3+ Bedroom	Total	Substandard Units
Occupied Units: Renter		20130	17212	6570	43912	4391
Occupied Units: Owner		523	5806	19004	25333	2027
Vacant Units: For Rent	5%	677	1123	427	2227	223
Vacant Units: For Sale	1%		100	163	263	21
Total Units Occupied & Vacant Rents: Applicable FMRs (in \$s)		21330	24241	26164	71735	6662
Rent Affordable at 30% of 50% of MFI (in \$s)		574	846	1,135		
Public Housing Units						
Occupied Units		499	213	120	832	2
Vacant Units		21	9	5	35	2
Total Units Occupied & Vacant		520	222	125	867	4
Rehabilitation Needs (in \$s)					0	

Specific Housing Objectives (91.215 (b))

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.*
- 2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.*

3-5 Year Strategic Plan Specific Housing Objectives response:

The Community Development Division will focus on the following objectives in the housing area:

- Improve the quality of the existing owner-occupied housing stock to possibly include an energy conservation and sustainability component as well as support for community stability and neighborhood revitalization efforts.
- Increase the opportunities for homeownership for low and moderate income individuals through the provision of downpayment assistance.
- Expand the number of affordable rental units and improve the quality and diversity of units available to lower income individuals throughout the community.

The City has developed this plan with the expectation that the Federal government will provide approximately \$19 million over the five year period through such programs as CDBG, HOME and ESG. The City expects to leverage these funds with state funds and local resources which include the Housing Trust Fund, revolving loan programs and Tax Incremental Financing (TIF).

Needs of Public Housing (91.210 (b))

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

3-5 Year Strategic Plan Needs of Public Housing response:

In recent years the Community Development Authority, which serves as the City's public housing authority and its redevelopment authority, has focused on the improvement of its existing publicly-owned housing units and the expansion of its housing voucher program. The CDA owns 867 housing units, which are further detailed in the housing market analysis table contained within this document.

A description of the families on 2009 waiting list for public housing noted that of the 565 families on the public housing list, 497 had incomes of 30% of AMI or less, 269 were families with children, 79 were families with disabilities, 17 were elderly families, and 296 needed 1-bedroom units. Of the 1,852 families on the Section 8 waiting list, 1,593 had incomes of 30% or less of AMI, 1,081 were families with children, 715 were families with disabilities, and 188 were elderly.

Public Housing Strategy (91.210)

- 1. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.*
- 2. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))*
- 3. 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. (NAHA Sec. 105 (g))*

3-5 Year Strategic Plan Public Housing Strategy response:

The Community Development Authority (CDA), the City's public housing agency, has placed a high priority on developing special programs to reduce the turn-over time for units, improve the long term maintenance program, and develop programs and services within each of the major housing complexes to serve the social, economic, recreational, and educational needs of its residents. Since the CDA has limited resources, they plan to apply for additional housing voucher funds when they become available in order to increase the affordable housing options for lower income households.

The CDA is governed by a Board of Directors, with two operating subcommittees. The CDA encourages resident participation and notices their meetings to residents and to the community at large, has resident representation on the subcommittees, and holds occasional hearings to gauge the needs and goals of its participants.

The CDA has also partnered with other lenders and private developers to secure some deteriorated apartment complexes in the Broadway-Simpson-Lakepoint neighborhood, and through a program of renovation and conversion, develop both new and remodeled apartment homes and condominiums to encourage homeownership for low and moderate income families. The CDA coordinates its program with the CDBG Office and other homeownership programs to link public housing tenants to homeownership opportunities whenever possible.

The CDA developed a Long Range Planning effort that identified renovation, rehabilitation and new construction at its Public Housing sites as a strategy to address local housing needs. The CDA developed a priority approach and worked with public housing residents to develop a concept plan at its priority site, the Truax Park Apartments Development Site. Funding is now being pursued for the renovation of these public housing units. In addition to renovations of existing units, funding is now being pursued for the construction of additional affordable housing units alongside Public Housing units. Tax Credit funding has been awarded and a Hope IV grant application is under consideration to support this effort.

HUD has not designated the Madison CDA as a troubled agency, and has given the agency high marks for its management and programs.

Barriers to Affordable Housing (91.210 (e) and 91.215 (f))

1. *Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.*
2. *Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.*

3-5 Year Strategic Plan Barriers to Affordable Housing response:

The cost to develop, maintain, or improve affordable housing in the City of Madison has been affected by several key factors, including the time it takes developers to take a project from start to finish; the clarity and ease of use of zoning codes; and the property tax policies. The City has identified barriers to affordable housing and is in the process of implementing strategies to remove these negative effects.

The zoning code is one of the primary tools the City uses to regulate development. This code is often confusing and difficult to use. In 2008, the City began a rewrite of the zoning code. This two year project is intended to provide a much improved code that is easier to use and understand. A Development Services Center website and ELAM (Enterprise Land Asset Management) system became operational in 2009. The City's Development Services Center provides a central location for information on the development review permitting and inspection processes of all City agencies. The Development Services Center helps to streamline the development process making it timelier and less costly for development to occur. The Community Development Division will continue to participate in the operational aspects of this system and seek its improvement through evaluation. The Division will continue to review its experience in the funding of affordable housing projects and where possible, seek Council action to remove non-financial obstacles to the construction of affordable housing within the City.

Another policy of concern relates to property tax exemption. New state legislation will allow property owned by a non-profit benevolent association and as low income housing to be exempt from local property taxes. Without recent change these low income housing properties would pay property tax resulting in greater expenses which would be passed on to the tenant through rent.

The Community Development Division will meet periodically with Third Sector Housing, a group of non-profit housing development agencies, to identify ways to improve the capacity of non-profit agencies for housing development, and to streamline various aspects of the funding proposal, contracting and procurement process too. Some of these recommendations will be reflected in the Program Funding Framework and guidelines for future years. Some will be incorporated into the procurement procedures and policies for the development process.

Homeless Needs (91.205 (b) and 91.215 (c))

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

Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

3-5 Year Strategic Plan Homeless Needs response:

Homeless Persons

There were a total of 8,650 homeless individuals in 2008: 3,894 individuals were served in emergency shelter, 1,120 were served in transitional housing and 3,636 individuals were turned away from shelter because of lack of shelter beds or funds for hotel vouchers. The number of families with children rose significantly from 1,317 in 2007 to 2,034 in 2009 while the number of single women and single men decreased slightly, from 515 women in 2007 to 504 women in 2008 and from 1,558 men in 2007 to 1,300 men in 2008. The most recent point in time survey (January 2009) of homeless people found that in one night 410 households with 611 individuals were homeless. Nine percent (9%) of those were unsheltered on that one night.

In 2008, the populations of homeless households shifted to reflect homeless families with children as the largest percentage of homeless individuals. Previously, single men had made up the largest group. Families with children make up the largest percentage (53%) of persons using emergency shelter followed by single men (34%) and single women (13%). Unaccompanied youth and couples make up less than 1% of the total homeless served in shelter.

The following table compares the number of individuals who had contact with providers of emergency shelter from 2004 to 2008.

	2004	2005	2006	2007	2008
Individuals Served in Shelter	3,342	3,039	3,487	3,432	3,894
Individuals Turned Away without Shelter	2,484	2,476	3,207	2,978	3,635
Total Estimated Homeless in Dane County	5,826	5,515	6,694	6,410	7,529

	2004	2005	2006	2007	2008
Individuals in Families	1,466	1,355	1,432	1,317	2,035
Families in Shelter	445	444	469	423	636
Children in Shelter	865	834	875	848	1,310
Single Women in Shelter	464	482	523	515	504
Single Men in Shelter	1,343	1,129	1,481	1,558	1,300
Unaccompanied Youth	67	61	43	40	27
Couples w/o Children	1	6	4	1	14

In 2008, the length of a homeless episode was similar to what was reported in 2007. Seventy-five percent (75%) indicated that their current episode of homelessness had been less than one month (78% in 2007). Fifteen percent (15%) of all households reported that their current episode of homelessness had lasted between one and six months (11% in 2007), while 10% reported their current homeless episode had lasted more than six (6) months (10% in 2007).

In 2008, the overflow warming shelter for families expanded operations to operate 365 days a year. In previous years, the warming shelter operated only during the coldest months. The warming shelter operated at The Salvation Army building on East Washington and provided shelter for families with no other options, either because they were no longer eligible for shelter or because there were no beds availability at the shelter. The Salvation Army provided over-night staff to provide a safe and secure place for homeless families to sleep on mattresses on the floor. Families were able to spend the daytime hours at The Road Home day center and receive support services.

During the 2008 calendar year, 587 individuals (190 families with 361 children) spent an average of 4 nights on mattresses at the warming shelter. For the first time, families were turned away from the warming shelter because of lack of space. In 2008, 238 individuals were turned away from overflow shelter. Of the 190 families that were served, 36 were two-parent households with children, 146 were headed by a single female and eight (8) were headed by a single male. Eighty-four percent (84%) of individuals in the overflow shelter reported being non-white – the majority being Black/African American.

Prior to coming to the warming shelter, 64% of families reported that they had doubled up with friends or families, 14% of families reported sleeping on the street or in a vehicle and 6% of families reported having stayed in emergency shelter.

Forty-two (42) warming shelter families reported the reason for their homelessness was a roommate or family conflict. Forty-one (41) families reported they had been evicted and 29 reported they were leaving a violent or threatening situation. Remaining families reported a variety of reasons for seeking shelter.

More than one-half (53%) reported having an existing medical condition, 34% reported issues with mental health, 18% reported developmental and/or physical disabilities, and 18% reported alcohol and/or other drug issues.

Of those families in the warming shelter, a least one adult in 26 families was employed full-time and 5 employed part-time. Of the remaining families, 125 households had no adult employed. Adults in 35 households were not likely to become employed as a result of a disability. This is consistent with the number of households who reported receiving income from SSI. Over two-thirds of the households had an adult who had a high school diploma or the equivalent; 51 adults attended some college or technical school, and 5 adults graduated college or technical school.

In 2008, the majority of families in the warming shelter reported being new to the area: 60% reported living in Dane County for less than one year (42% less than one month) and 53% reported living in Wisconsin for less than one year (36% less than one month). These numbers indicate a slight increase in the number of families using the warming shelter who reported living in Dane County, but a slight decrease who reported living in Wisconsin, for less than one month from the previous year.

The reasons most frequently given for seeking emergency shelter vary somewhat by sub-population. Thirty-six percent (36%) of families and 23% of single women most often said that "violence or threat of violence" (36%) brought them to seek emergency shelter. Single men reported that they were seeking shelter most often as a result of "no or low income" (23%). For runaway/throw away youth, "conflicts with family/roommate" was mentioned by 74% of those seeking shelter. The reasons given have generally been consistent year to year.

Where members of households slept prior to seeking shelter is also different depending on the sub-population. Over half of families (54%) were likely to have been doubled up with friends or family. However, the trend for families show they are becoming less likely to double up in 2008; 57% in 2007, 63% in 2006 and 75% in 2005. Almost half (44%) of single women report doubling up with friends or family.

The number of households who reported sleeping on the street or in a vehicle differed by sub-population: 16% of single women, 12% of single men, 11% of families and 8% of all runaway/throw away youth reported sleeping on the street or in a vehicle. Seventy-six (76) families with children reported sleeping in an uninhabitable place, which is an increase back to the 2006 level when 79 families reported sleeping on the street or in a vehicle. One hundred forty-eight (148) single men (down from 230 single men in 2007), 67 single women (down from 82 single women in 2007) and two (2) runaway/throw-away youth spent time on the street or in a vehicle prior to seeking shelter.

In 2008, 33% of all households in shelter reported they lived in Dane County less than one year while 19% reported living in the county for less than one month. Seven percent (7%) lived in Dane County for one to two years and 61% lived in Dane County for two years or more. These numbers reflect a slight shift towards current Dane County residents seeking shelter away from homeless individuals moving into the area. Twenty-three percent (23%) of homeless households reported living in the state for less than one year, 6% for one to two years, and 72% lived in the state for two years or more. Households seeking shelter were more likely to have lived in Wisconsin than in Dane County indicating at least a number of households were relocating from other Wisconsin areas. This would indicate that homeless

households who relocate to Dane County come from both out-of-state and from other locations in Wisconsin.

In 2007, 55% of families, 55% of single women, and 74% of single men reported that they had lived in Dane County for one year or more before seeking shelter. For families and single women, this is about the same as reported in 2005, 2006 and 2007. Data for the majority of single men was not available in 2005 and 2006 and only partially available in 2007 and 2008.

Families and single women were the most likely to seek shelter in the initial month of their residency in Dane County and Wisconsin. For families, slightly less than half (45%) reported living in Dane County for less than one year; 29% reported living in Dane County for less than one month. These numbers were nearly the same in 2006 and 2007.

Forty-four percent (44%) of single women reported living in Dane County for less than one year with 33% reported living in Dane County for less than one month. These numbers were nearly the same in 2006 and 2007.

For those single men who reported data, 8% reported living in Dane county for less than one year and only 1% indicated that they were new to Dane County and/or Wisconsin (less than one month). Three-quarters reported living in Dane County for one year or more.

For 2008, a total of 352 households resided in Dane County less than one month prior to seeking shelter, while a total of 1,269 households resided in Dane County for one year or more and 1,163 of those households resided in Dane County more than two years.

In 2007 and 2008, 70% of the homeless served identified themselves as non-white. Eighty-eight percent (88%) of those who identified themselves as non-white specifically identify themselves as Black/African American. The number of households who identify themselves as non-white fluctuates by sub-population. Families are more likely to be non-white than single women or single men. More than four out of five families reported that they are non-white, with the majority being Black/African American. For all subpopulations, the numbers of minorities who seek shelter remained somewhat steady.

Homeless Individuals by Racial Category 2004-2008

	2004	2005	2006	2007	2008
Total Percent Who Identify Themselves as Non-white	71%	65%	68%	70%	70%
Percent of Individuals in Families Who Identify Themselves as Non-White	86%	84%	87%	86%	83%
Percent of Single Men Who Identify Themselves as Non-White	50%	48%	52%	59%	55%
Percent of Single Women Who Identify Themselves as Non-White	55%	61%	63%	63%	58%

Nine percent (9%) of homeless households include a veteran. This is the same percentage as in 2006 and 2007. There are many more single homeless men who

are veterans than any other sub-population. The wide fluctuations of male veterans between 2005 and forward is likely the result a shift in the way data was collected.

Length of Time in Shelter by Population 2004 - 2008

	2004	2005	2006	2007	2008
Families with Children	19	13	5	7	16
Single Men	75	62	212	203	202
Single Women	16	10	16	9	13

While the reasons for homelessness are complex, the physical barriers identified by homeless households are significant. About half of all families and single women seeking shelter report that they have existing medical conditions. This is less likely for single men and unaccompanied youth. A significant percentage of homeless households report issues with mental illness; households without children report more involvement with alcohol and drug issues than do families.

Thirty-eight percent (38%) of families reported that they have one or more members who suffer from mental illness; 21% report that someone in the family has an alcohol or drug abuse issue; and 8% report that someone in the family has a physical disability.

Forty-nine percent (49%) of single women reported having issues with mental illness and 36% reported issues with alcohol and/or drug abuse. Sixteen percent (16%) of single women reported that they have a physical disability.

Twenty-seven percent (27%) of single men reported issues with mental illness and 34% reported alcohol or other drug abuse issues. Four percent (4%) indicate that they have a physical disability.

Forty-one percent (41%) of unaccompanied youth reported issues with mental illness and 74% reported alcohol or other drug abuse issues. Eight percent (8%) indicate that they have a physical disability.

The trend for length of time in shelter varies by sub-population. On average in 2008, single men spent nearly two (2) days more than families with children and 3.4 days more than single women. Unaccompanied youth spent a relatively short time in volunteer host homes. The number of days that families spent in shelter has decreased since 2003 while single men and women's average days have increased. However, until all shelter providers are using Wisconsin ServicePoint to report client based data, it will not be possible to determine the entire length of time a household spends in shelter if that household stays in more than one facility.

	2004	2005	2006	2007	2008
Families with Children	31.60	32.84	32.10	35.09	25.45
Single Men¹	21.30	26.36	25.14	22.98	27.27
Single Women²	22.85	18.93	20.20	21.40	23.83
Unaccompanied Youth	1.31	1.14	1.25	1.50	1.37

Persons at Risk of Homelessness

Persons at risk of homelessness are defined as those who have received notice of an eviction or utility cut-off. While there are a number of factors that contribute to a household's ability to maintain stable housing, e.g. such as being young single

¹ Calculated using Porchlight Drop-In Shelter data.

² Calculated using The Salvation Army Single Women's shelter data.

parents, physical and mental illnesses, and lack of education, these factors are not considered when determining eligibility for services specifically for those at risk of homelessness.

The City focuses a portion of federal, state and local funds to providing prevention services for those at risk of homelessness. The City works with the County and community-based groups to identify households at risk of eviction, providing them with short-term and temporary rent assistance and/or landlord/tenant mediation services and link them with supportive services such as financial management. The City's CDBG Office acts as the lead agency to prevent homelessness working with the Homeless Services Consortium, Dane County's Continuum of Care organization, to implement a variety of activities to reduce the risks of homelessness. The City contracts with Community Action Coalition for South Central Wisconsin, Inc. to provide short-term rental assistance, limited financial counseling and landlord/tenant mediation. Nine other non-profit homeless service agencies create a formalized referral base for eligible households.

In the next two years, the CDBG Office will manage a contract for services, using Homelessness Prevention and Rapid Re-Housing Program funds, with Community Action Coalition serving as the lead agency and collaborating with an additional eight (8) non-profits representing all the subpopulations of low-income households with a risk of homelessness. Seventy-nine percent (79%) of the HPRP funds are targeted to serving those with an eviction notice and/or utility shut-off notice who, but for this assistance, would be homeless.

Priority Homeless Needs

- 1. Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.*
- 2. A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.*

3-5 Year Strategic Plan Priority Homeless Needs response:

The members of the Homeless Services Consortium (HSC) collaborated with one of its members, Community Action Coalition for South Central Wisconsin, Inc. (CACSCW), to create, and implement a 2007 Needs Assessment process. CACSCW has implemented a needs assessment every three years since 1982. Prior to 2007, the HSC conducted an annual or biannual survey of its own. Since many HSC agencies have previously participated in distributing CACSCW surveys to their clients, it seemed a very good fit to combine the two efforts. Another reason to change to the tri-annual assessment is that the needs have changed very little over the past decades.

A total of 350 low-income households, including those who were homeless (in shelter or transitional housing) and those who were at risk of homelessness, were asked to complete a needs survey. The survey respondents represented a broad demographic mix of individuals and household types.

The six needs listed below are a compilation of “strongly agree/agree” and “strongly disagree/disagree” responses to statements regarding needs. For example, the statements “I can’t afford to pay both security deposit and first month’s rent at one time” and “I need more education / training to get a better job” ranked #1 and #2 for “strongly agree/agree” responses.

The results of the survey were reviewed by a committee of the Homeless Services Consortium (HSC) which serves as the local CoC. The HSC review consisted of the results of the needs survey as well as data including: an inventory of housing units affordable to low-income, number of households turned away from shelter/housing, services where the demands far exceed the availability, and funding currently available.

The results of the needs assessment identified the following needs in order of importance:

1. Financial assistance to help obtain and maintain housing for families and single adults.
2. Employment/Jobs – training and access to employment for families, single adults and unaccompanied youth.
3. Assistance in finding housing/ ability to maintain housing – supportive services for families, single adults and unaccompanied youth.
4. Access to medical treatment (including physical health issues, alcohol and other drug abuse treatment; mental health services) for families, single adults and unaccompanied youth.
5. Access to reliable and affordable transportation for families, single adults and unaccompanied youth.
6. Assistance with Landlords - legal advocacy, housing mediation for families and single adults.

Individuals who are chronically homeless have all the same needs mentioned by other homeless and individuals at risk of homelessness. The challenge for many chronically homeless individuals is having service providers able to work with them over the long term to help them maintain their successes. In 2009, one additional outreach worker was funded to help chronically homeless access housing and services.

Homeless Inventory (91.210 (c))

The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

3-5 Year Strategic Plan Homeless Inventory response:

The local access points for people who are homeless or at risk of being homeless are through efforts defined as prevention, outreach and assessment, emergency shelter, transitional housing and supportive permanent housing. The Madison-Dane County efforts emphasize a broad network of case management and support services within

each phase as a major strategy to prevent homelessness and move homeless persons quickly from homelessness into stable housing. A brief summary of the current facilities and services that assist homeless persons and families with children and subpopulations is listed below.

In 2008, the following occurred:

- Approximately 2,000 households, who would have likely become homeless with financial assistance and supportive services avoided homelessness. Through funds targeted to households at risk of homelessness, financial assistance was provided in the form of back rent, back utility payments and short term rent subsidies to enable households to remain in their housing. Several non-profit agencies participate in providing support services to these households
- Five (5) outreach workers working with unaccompanied youth and single adults connecting homeless persons with services worked with approximately 300 unsheltered homeless individuals. With financial assistance provided by the City approximately 50 individuals have accessed housing directly from sleeping in uninhabitable places.
- Madison-Dane County had 297 beds, 67 overflow, available for Emergency Shelter Housing. Depending on the location, the agencies serve families, single women with children, single men and women, men and women with mental illness and youth. In 2007, these shelters served 3,432 individuals.
- Madison-Dane County had 230 beds/units available for Transitional Housing. The agencies providing the housing served single men and women, individuals with a need for AODA treatment, families, couples, individuals with mental illness, women with children, and single men who are veterans. In 2007, the transitional housing units served 1,009 individuals.
- Madison-Dane County had 715 beds/units available in 2008 for Supportive Permanent Housing. The agencies providing housing served single men and women, families, women and men that needed AODA treatment, disabled singles and families, singles and families with mental illness and single women with children. In 2007, these units served 1,172 people.
- Madison-Dane County has 419 Privately Owned Single Occupancy (SRO) Units, not including those available for Transitional or Supportive Permanent Housing, primarily used by men and women, both student and non-students.
- The City of Madison has 5,742 units of Federally Assisted Housing. These units are occupied by families, persons with special needs, the elderly and disabled. There are also 48 Federally Assisted Family units currently under construction.

HOMELESS STRATEGIC PLAN

1. *Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.*
2. *Chronic homelessness—Describe the jurisdiction's strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Conplan, CoC, and any other strategy or plan to address chronic homelessness.*
3. *Homelessness Prevention—Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.*
4. *Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.*
5. *Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the 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." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.*

3-5 Year Homeless Strategic Plan response:

In Dane County, the City of Madison works with a variety of housing, social and health service organizations to meet the needs of homeless persons. The lead group exploring ongoing issues of homelessness is the Homeless Services Consortium (HSC). The HSC functions as the local Continuum of Care (COC), recognized by the U.S. Department of Housing and Urban Development as the local planning and decision-making body on programs funded with HUD's homeless assistance programs.

The HSC plans and manages the homeless system's coordination through an ongoing collaboration of public and non-profit agencies, funders, advocacy groups and formerly homeless individuals. Monthly HSC meetings and regular meetings of several issue-specific committees, deal with topics such as the level of system integration, progress on action steps in the plan to prevent and end homelessness, joint funding proposals and researching best practices through visits to other communities. The meetings provide an important venue for consumers, providers and funders to identify system-wide gaps and community-based solutions. In addition to the monthly meetings, all stakeholders routinely work together to identify needs, set priorities and strategy, eliminate duplication, evaluate, coordinate and improve services and the delivery system. Currently, the HSC encompasses nearly 50 entities providing housing and support services to the homeless.

In 2006, the Homeless Services Consortium created a blueprint for action to enable Dane County to prevent and end homelessness. From a full-day community planning

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process to a number of meetings with homeless agency staff to meetings with homeless and formerly homeless persons to meetings with the Mayor, County Executive, and United Way, the HSC organized the input into three goal statements. These goals were centered around providing: 1) a safety net for homeless households, 2) support services for homeless or those at risk, and 3) an adequate inventory of affordable housing units. Each of the goal statements includes a number of objectives:

1. Provide support services for homeless households and households at risk of homelessness to enable them to access and maintain stable housing.

- Increase the availability of effective case management services.
- Increase financial resources to households so that they are able to afford the cost of housing.
- Advocate for resources to help households maintain housing such as employment services, medical and dental services, AODA prevention and services, mental health services, childcare, transportation, and education.
- Provide education to help households better manage their resources.
- Build on efforts to improve relationships between those who need housing (tenants) and those who have housing (landlords).
- Protect the legal rights of tenants to ensure that all are treated without discrimination and within the boundaries of the law.
- Assure households' access to appropriate services by improving the process used by HSC agencies to direct and refer (No "wrong door").

2. Help homeless households by providing a short-term safety net with continuous support services with the goal of moving to stable housing as quickly as possible.

- Develop a local "Housing First" model to serve the needs of homeless families, single adults and unaccompanied youth.
- Provide safe shelter beds for homeless families with children and single adults until such time that other more appropriate housing alternatives are available.
- Provide housing alternatives for unaccompanied homeless youth.
- Ensure safe housing alternatives with on-going supportive services for victims of domestic violence.
- Provide and expand on ready-access for homeless households to store personal belongings and to access transportation services, voice mail, showers and meals during the daytime hours.
- Provide effective street-level outreach services to increase the access to housing and services by chronically homeless individuals.
- Respond to urgent short-term needs of homeless persons by the flexible use of community resources.

3. Provide an adequate inventory of affordable housing units for low-income households, whether by creating new units or making existing units affordable.

- Provide a variety of housing units that are affordable for low-income single

adults and families with children, and for those with special needs such as mental illness or physical disability.

- Support housing subsidies that will increase the number of private market housing units affordable to low-income households.
- Explore the feasibility of other housing models in the effort to find affordable housing for low-income households. Encourage small-scale innovative approaches to preventing and ending homelessness.

Each objective includes a number of action steps, designates the lead entities for seeing that there is progress made, and proposed outcomes. On an annual basis, the Community Plan Oversight Committee, made up of funders and agency staff, gather data on the action steps to determine success or continued challenge. Through efforts by the community, government and non-profit groups some of the results have been very positive.

In 2008, the following occurred:

- 1,798 families received housing case management services. Since 2005, Homeless Services Consortium agencies have increased their annual capacity to offer case management services to an additional 145 families.
- More than 82% of households receiving housing and support services maintained their housing at the 12 month mark.
- Dane County hired two employment specialists that helped 72 homeless persons find employment. Since 2006, 980 women received appropriate workplace clothing through Homeless Services Consortium agency programs.
- 1,709 households received help with budgeting and financial literacy; this number doubled since 2006.
- 2,664 low-income families received child care financial assistance which is an increase of 172 households since 2006.
- There were 26 Housing First slots for homeless families and 15 Housing First slots for homeless single adults shortening their stay in emergency shelter; this is a six-fold increase from the number of slots in 2006.
- 265 units of supported permanent housing units were available for previously homeless individuals and families with a persistent mental illness. This is an increase of 91 units since 2006.
- There were a total of 8,155 federally assisted rental units available throughout Dane County; this is an increase of 715 units since 2006.
- 86 short-term rent subsidies and 50 long term rent subsidies were available to homeless persons in order to make existing housing affordable. This is a slight increase of 29 rent subsidy slots available since 2006.
- The Dane County Jail Diversion budget for individuals with AODA and mental illness issues has increased more than \$412,000 since 2006.
- Prisoners from Oak Hill Correctional institution became eligible for SSI prior to their release, giving them a source of income to reduce the chance that they will be released to homelessness. Since 2006, 57 prisoners have been eligible.
- The City and County partnered with The Salvation Army and The Road Home

to provide a year-round overflow warming shelter for homeless families with no other place to go.

- Society of St. Vincent de Paul created a storage program to accommodate the belongings of homeless individuals while they search for employment and housing.
- Tellurian, Porchlight and Youth Services of Southern Wisconsin spent over 11,000 outreach hours working with homeless youth and adults to connect them with services and housing. Fifty (50) adults moved from the street into housing with the help of outreach workers.
- Homeless Services Consortium housing agencies operated 985 service-supported transitional and permanent housing units for previously homeless persons; this is an increase of 153 units since 2006.

Some goals in the Community Plan can have a positive impact on chronically homeless individuals as well as others who are homeless or who are at risk. Goals related to expediting SSI and other entitlement benefits are specifically helpful to those who have been homeless over the long term, as well as increased AODA treatment beds and diagnosis and treatment of mental illness. The Plan also calls for increasing the number of Housing First beds many of which will operate on a harm-reduction model, benefitting chronically homeless as they move directly from the street into housing.

The HSC has been in contact with Corrections, County foster care, and mental health institutions, some of whom are HSC members, to ensure that they not only have discharge policies not to discharge clients into homelessness, but that they also follow this in practice. The Dane County jail recently added a Discharge Planner that works specifically with inmates that have been identified as having mental illness. The Planner works with others in the community that can offer support and a continuum of services and medication. Since some of these inmates were actually homeless prior to being incarcerated, the Planner will work with local supportive housing agencies to serve this clientele as appropriate.

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Continuum of Care Homeless Population and Subpopulations Chart																																									
Part 1: Homeless Population					Sheltered		Un-sheltered		Total		Madison																														
					Emergency		Transitional				Data Quality																														
1. Homeless Individuals					217		75		26		318																														
2. Homeless Families with Children					52		30		11		93																														
2a. Persons in Homeless with Children Families					173		92		28		293																														
Total (lines 1 + 2a)					390		167		54		611																														
Part 2: Homeless Subpopulations					Sheltered		Un-sheltered		Total		Data Quality																														
1. Chronically Homeless					110		13		123		(A) administrative records																														
2. Severely Mentally Ill					255		0		255		(A) administrative records																														
3. Chronic Substance Abuse					175		0		175		(A) administrative records																														
4. Veterans					67		0		67		(A) administrative records																														
5. Persons with HIV/AIDS					33		0		33		(A) administrative records																														
6. Victims of Domestic Violence					82		0		82		(A) administrative records																														
7. Youth (Under 18 years of age)					1		0		1		(A) administrative records																														
Part 3: Homeless Needs Table: Individuals		Needs	Currently Available	Gap	5-Year Quantities										Total			Priority H, N, L	Plan to Fund? Y, N	Fund Source: CDBG, HOME, HOPEWA, ESG or Other																					
Beds		Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Actual	% of Goal	H	Y	C, H, O																				
																						Year 1	Year 2	Year 3	Year 4	Year 5	Goal	Actual	% of Goal												
	Emergency Shelters	0	175	-175	0	0	0	0	0	0	0	0	0	0	0	0	0	0	###	N/A	N																				
	Transitional Housing	562	113	449	0	0	0	0	0	0	0	0	0	0	0	0	0	0	###	N/A	N																				
	Permanent Supportive Housing	454	344	110	5	0	5	0	5	0	5	0	5	0	5	0	25	0	0%	H	Y	C, H, O																			
	Total	1016	632	384	5	0	5	0	5	0	5	0	5	0	5	0	25	0	0%	H	Y	C, H, O																			
Chronically Homeless																																									
Part 4: Homeless Needs Table: Families		Needs	Currently Available	Gap	5-Year Quantities										Total			Priority H, N, L	Plan to Fund? Y, N	Fund Source: CDBG, HOME, HOPEWA, ESG or Other																					
Beds		Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Actual	% of Goal	H	Y	C, H, O																				
																						Year 1	Year 2	Year 3	Year 4	Year 5	Goal	Actual	% of Goal												
	Emergency Shelters	0	124	-124	0	0	0	0	0	0	0	0	0	0	0	0	0	0	###	N/A	N																				
	Transitional Housing	1162	163	999	38	0	38	0	38	0	38	0	38	0	38	0	190	0	0%	H	Y	C, H, O																			
	Permanent Supportive Housing	398	200	198	38	0	38	0	38	0	38	0	38	0	38	0	190	0	0%	H	Y	C, H, O																			
	Total	1557	487	1070	76	0	76	0	76	0	76	0	76	0	76	0	380	0	0%	H	Y	C, H, O																			

Completing Part 1: Homeless Population. This must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The counts must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Completing Part 2: Homeless Subpopulations. This must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The numbers must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Sheltered Homeless. Count adults, children and youth residing in shelters for the homeless. "Shelters" include all emergency shelters and transitional shelters for the homeless, including domestic violence shelters, residential programs for runaway/homeless youth, and any hotel/motel/apartment voucher arrangements paid by a public/private agency because the person or family is homeless. Do not count: (1) persons who are living doubled up in conventional housing; (2) formerly homeless persons who are residing in Section 8 SRO, Shelter Plus Care, SHP permanent housing or other permanent housing units; (3) children or youth, who because of their own or a parent's homelessness or abandonment, now reside temporarily and for a short anticipated duration in hospitals, residential treatment facilities, emergency foster care, detention facilities and the like; and (4) adults living in mental health facilities, chemical dependency facilities, or criminal justice facilities.

Unsheltered Homeless. Count adults, children and youth sleeping in places not meant for human habitation. Places not meant for human habitation include streets, parks, alleys, parking ramps, parts of the highway system, transportation depots and other parts of transportation systems (e.g. subway tunnels, railroad car), all-night commercial establishments (e.g. movie theaters, laundromats, restaurants), abandoned buildings, building roofs or stairwells, chicken coops and other farm outbuildings, caves, campgrounds, vehicles, and other similar places.

Community Development (91.215 (e))

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

- 1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.*
- 2. Describe the basis for assigning the priority given to each category of priority needs.*
- 3. Identify any obstacles to meeting underserved needs.*
- 4. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.*

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

3-5 Year Strategic Plan Community Development response:

The City of Madison has placed a high priority on the expansion of economic opportunities for lower income persons through job creation and employment training, on the creation and improvement of neighborhood-focused facilities that serve lower income neighborhoods, on the operation of neighborhood centers and community gardens, and on revitalization efforts that address higher priority needs within selected geographical areas within the CDBG Target areas.

Priority is reflected in part by the amount of resources targeted for each area, since the CDBG Office believes that a balanced portfolio of projects effectively implemented over a period of time will result in the most productive effect within the community. The City has developed these priorities over a period of time, based on census, demographic and market data, supplemented by numerous planning processes and public forums, as well as periodic evaluation of the effectiveness of current strategies and projects. These are complemented by discussions and other coordinated research efforts among other city and community funders.

The major obstacles to meeting underserved needs are the lack of Federal resources to mount an effective, long-term campaign to revitalize lower income neighborhoods and expand opportunities for lower income people, as well as the negative impact of certain market forces that create crisis events for low income families where lack of resources and informal safety nets raise barriers to successful survivor strategies.

In addition to the limited resources, regulations that control these resources often add to the cost and complexity of project administration. In addition, supporting a project with multiple fund sources increases the complexity and reduces flexibility.

To help families and neighborhoods address these needs and reduce these obstacles, the City has adopted the following non-housing community development objectives:

1. Help businesses and non-profits grow in ways that create new employment opportunities for lower income persons which expands economic opportunity and improves the quality of life for unemployed and underemployed individuals.

2. Assist micro-enterprises thrive to become the principal occupation of their owners or create jobs for lower income persons.
3. Connect residents to job training opportunities that lead to permanent employment that offers a living wage or greater.
4. Create, enhance or sustain the operation of neighborhood centers and community gardens that bring people of diverse backgrounds together, serve as neighborhood focal points, or provide residents with skills or opportunities that will lead to stronger neighborhoods.
5. Assist residents of designated neighborhoods identify opportunities and promote sustainable revitalization efforts. Encourage sustained, complementary and comprehensive revitalization efforts in selected neighborhoods.
6. Create or improve safe, accessible and well-maintained environments for the delivery of human and recreational services to the CDBG target population.

Antipoverty Strategy (91.215 (h))

1. *Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.*
2. *Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.*

3-5 Year Strategic Plan Antipoverty Strategy response:

The general Antipoverty strategy of the City is to promote the accessibility and availability of employment, education, health care and family support services to lower income households to help them develop greater family independence and to promote neighborhood involvement, steps which will eventually lead to the reduction of poverty throughout the City.

The City has adopted these major strategies to achieve these goals of poverty reduction:

1. Market information about resources to poverty level households;
2. Refine housing assistance programs to better link such housing assistance to other helping resources, including self-help activities, such as community gardening and employment efforts;
3. Improve City service delivery systems to become more responsive to neighborhoods where poverty-level families tend to reside and encourage goals, policies and practices which tend to involve these neighborhoods in the City's decision processes and revitalization efforts.
4. Increase economic development and employment and training opportunities.
5. Improve collaborative efforts between local governments, non-profits, schools and businesses.

Over the next 5 years the City will continue to focus revitalization efforts on the Allied Drive, South West and Leopold school areas where needs have been identified.

In addition, the North side Plan will be implemented. Additional revitalization efforts will take place in 15 areas during the period covered in this Consolidated Plan.

The City will continue efforts to work more closely with residents, owners and community groups to address emerging revitalization issues. These efforts will continue to:

- Improve the public infrastructure within the areas.
- Continue to support a Neighborhood Resource Team in each of the 5 designated areas (includes representatives from Civil Rights, Building Inspection, Public Health, Police, Community Development Division, Fire and Parks).
- Increase effectiveness of the overall police law enforcement efforts to reduce criminal activity.
- Stabilize the management of rental housing in transitioning and challenged neighborhoods.
- Support efforts of owners and residents to reduce energy consumption.
- Assess and refine the City's efforts to support resident involvement and empowerment in the community.
- Coordinate and collaborate programs and services with other funders, agencies, businesses and neighborhoods organizations.

The City's efforts will assist in reducing poverty by addressing emerging neighborhood needs. These efforts will bring additional services and opportunities to residents that may have been previously underserved or isolated.

Low Income Housing Tax Credit (LIHTC) Coordination (91.315 (k))

(States only) Describe the strategy to coordinate the Low-income Housing Tax Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.

3-5 Year Strategic Plan LIHTC Coordination response:

Not applicable to the City of Madison.

NON-HOMELESS SPECIAL NEEDS

Specific Special Needs Objectives (91.215)

1. *Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.*
2. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.*

3-5 Year Non-homeless Special Needs Analysis response:

The City of Madison places a high priority on the development and maintenance of permanent housing that serves non-homeless people with special needs. The City

helps identify and fund projects that provide on-site or specific service linkages to other agencies and services that benefit local residents.

The City has regularly supported several groups that work with special populations to promote the development of affordable rental housing (Housing Initiatives for participants in mental health services and Independent Living for older people) and homeownership (Movin' Out for persons with disabilities). HOME and CDBG funds will be used to fund these activities.

The City requires that a portion of any housing project assistance be targeted toward the development of housing units accessible to persons with disabilities.

The City does not make specific set-asides for housing to serve special needs but considers such housing proposals and their service linkages as part of the planning and funding processes described elsewhere in the plan.

Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)

**Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.*

1. *Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.*

**Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.*

2. *Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.*

3. *Describe the basis for assigning the priority given to each category of priority needs.*

4. *Identify any obstacles to meeting underserved needs.*

5. *To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.*

6. *If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.*

3-5 Year Non-homeless Special Needs Analysis response:

The 2000 census noted that 19,184 people (9.2% of the Madison population) were 65 and over. 11% of the population over 60 years of age was 85 and older, a commonly used measure for "frail" elderly. This is an increase in the percentage of this population compared to 1990, when only 9.3% of the older population was 85 and older.

The national average for adults age 16 to 64 with disabilities is 19.3%. In 2007, 12.9% of the Madison adult population 16 to 64, or 29,244 people, reported some sort of disability. The break-out by type is as follows:

Sensory: 2,983
Physical: 6,448
Mental: 6,912

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Self-Care: 2723

Employment disability: 10,178

The local service delivery system in Wisconsin relies on State funding of County government to provide the lead human services for these populations. The City of Madison has chosen to provide some supplemental levels for particular functions, such as the development of housing for people with special needs through organizations such as Movin' Out and Housing Initiatives. This Five Year Plan will continue that focus on housing production and adaptation.

The CDBG Office has given assistance to organizations that provide supportive permanent housing in the City of Madison. Some examples include the following: Goodwill Industries, Housing Initiatives, Inc., Porchlight, Inc., Rodney Scheel House, Tellurian and the YWCA of Madison. Additional information about these resources can be found in the City's Annual Homeless Reports, available on the City's website at www.cityofmadison.com/cdbg.

The City does not currently plan to use HOME funds for direct rental assistance, but may amend this plan through an annual amendment to provide such an option. The current priority is to use HOME funds to expand the availability and accessibility of housing stock designed to serve the housing needs of those populations.

OTHER NARRATIVE

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

The City of Madison has a strong commitment to affirmatively further fair housing and the expansion of housing opportunities for groups traditionally limited in their housing choices. The City funds an excellent Department of Civil Rights that provides outreach and education regarding Madison's fair housing and anti-discrimination ordinances and provides an alternative complaint processing system in addition to State and Federal systems. The City has an extensive array of protected classes within its housing anti-discrimination ordinance, and works with property owners and managers to promote an understanding of its goals and protocols.

The CDBG Committee funds a broad array of community-based agencies to help serve low income and minority populations, and that address fair housing and housing choice issues. In addition, the City funds or has funded certain community groups that have special affinities for some populations, such as Hmong or Hispanics, to promote fair housing, housing choice, and housing counseling as part of the City's efforts to increase individual knowledge of housing opportunities.

In summary, the City of Madison has developed this Consolidated Plan to meet several goals:

- To outline strategies that it will use with its community and funding partners to advance projects that support the community development program.
- To meet the planning requirements of some of our funders in order to secure additional development funds.
- To offer a public forum for an ongoing discussion about the future of the City of Madison.

The Community Development program commits itself to working within its community, city and funding partners to facilitate cooperation and invest in projects

that will accomplish this vision of a better community: well-housed, with healthy businesses that offer good employment, excellent community-based services and facilities that respond to the needs of all of Madison's population, strong and viable neighborhoods, and growing opportunities for all residents.

FINAL DRAFT

**Synopsis of Citizen Comments on the
City of Madison
2010-2014 Consolidated Plan**

Public Hearing – March 5, 2009

Summary:

On March 5, 2009, a public hearing was held at the CDBG Committee meeting regarding the 2008 annual performance of the City of Madison Community Development program and the 2010-2014 Consolidated Plan. The public was notified of this meeting by an ad that was placed in the Wisconsin State Journal on February 20, 2009. The CDBG Office website also contained information about the meeting. In addition, an email was sent to all partner agencies, other funders in the community and other City departments. Citizens were given the opportunity to attend the meeting, send their comments by mail or email or contact the CDBG Office by telephone.

Below is a summary of the observations and recommendations that were made during the comment period. Following the summary is the CDBG Office response.

Comment:

One agency representative expressed appreciation to the CDBG Committee for its ongoing support of economic development through micro-enterprise technical assistance and lending. They felt that the CDBG Office and Committee were very effective in working with community groups to achieve the goals of the five-year plan. However, they would like to encourage the City of Madison to make economic development through micro-enterprise, small business assistance and lending a priority.

CDBG Office Response:

Economic Development has become more of a priority for the City of Madison in the past few years. With the re-organization of the Department of Planning and Economic and Community Development, two new divisions were formed – the Community Development Division and the Economic Development Division. New Directors for each division were hired.

In addition, the CDBG Office has established a 5-year goal of business develop with objectives to include job creation and micro-enterprise development. In 2008, the CDBG Office funded the Latino Chamber of Commerce, AABBA, WWBIC and Madison Development Corporation to help meet these goals. The CDBG Office recognizes the importance of micro-enterprise development especially in the current economy where jobs are being lost and new micro-enterprises are being considered and started.

Comment:

One agency representative expressed concern about CDBG Office housing policies given the current market conditions. The concerns include the following:

1. Cannot build net worth as an organization.
2. Annual audits are more complex and expensive due to the number of loans involved in projects funded by the CDBG Office.
3. No City funding to cover predevelopment costs.
4. Do not have a stable year-to-year source of funding for their stewardship responsibilities.
5. Development projects take years to put together because the City's per unit funding does not come close to covering the affordability gap and there are no other sources other than MG&E which provides \$2,500.

CDBG Office Response:

The CDBG Office Framework is developed prior to each 2-year funding cycle. As a part of this development process, several public hearings are held to obtain feedback from citizens, agencies and other City staff to make final decisions on the policies. Final policy recommendations are approved by the CDBG Committee and then approved by the Common Council for use.

Public Hearing – September 3, 2009

Summary:

On September 3, 2009, a public hearing was held at the CDBG Committee meeting regarding the 2010-2014 Consolidated Plan. The public was notified of this meeting by an ad that was placed in the Wisconsin State Journal on August 20, 2009. The CDBG Office website also contained information about the meeting. In addition, an email was sent to all partner agencies, other funders in the community and other City departments. Citizens were given the opportunity to attend the meeting, send their comments by mail or email or contact the CDBG Office by telephone.

Below is a summary of the observations and recommendations that were made during the comment period. Following the summary is the CDBG Office response.

Comment:

A representative was present to address the issue of the permanent housing needs for domestic violence victims. She discussed that there is a correlation between families in shelters and domestic violence. She also stated that other counties had more shelter beds and that she would like to see this issue addressed further.

CDBG Office Response:

The 2010-2014 Consolidated Plan does not specifically address a separate housing need for victims of domestic violence. However, in 2009 the CDBG Office has provided \$30,000 to provide overflow vouchers when shelters are full. In addition, the CDBG Office has made deferred and forgivable loans to upgrade the current shelter. CDBG staff has been involved in discussions revolving around a possible new shelter in the future.

Comment:

A representative expressed appreciation to the CDBG Committee for its ongoing support of economic development through micro-enterprise technical assistance and lending. They also thanked the Division Director for the opportunity to be part of the focus group that was held to discuss the 2010-2014 Consolidated Plan. The representative encouraged the City of Madison to make the area of economic development through micro-enterprise, small business assistance and lending a priority and increase funding in this area.

CDBG Office Response:

Economic Development has become more of a priority for the City of Madison in the past few years. With the re-organization of the Department of Planning and Economic and Community Development, two new divisions were formed – the Community Development Division and the Economic Development Division. New Directors for each division were hired.

In addition, the 2010-2014 Consolidated Plan includes a goal to expand businesses to create jobs and assist with the development of microenterprises. In 2009, the CDBG Office funded the Latino Chamber of Commerce, WWBIC and Madison Development Corporation to help meet these goals. The funding for these agencies will also continue into 2010. The CDBG Office recognizes the importance of micro-enterprise development especially in the current economy where jobs are being lost and new micro-enterprises are being considered and started.

Comment:

A representative spoke in support of expanding the development of microenterprises and training especially for the Hispanic population. It was noted that many people want to start their own businesses but there aren't enough resources available to help them. The representative thanked the Committee for considering these needs and stated that there is a lot of interest.

CDBG Office Response:

Economic Development has become more of a priority for the City of Madison in the past few years. With the re-organization of the Department of Planning and Economic and Community Development, two new divisions were formed – the Community Development Division and the Economic Development Division. New Directors for each division were hired.

In addition, the 2010-2014 Consolidated Plan includes a goal to expand businesses to create jobs and assist with the development of microenterprises. In 2009, the CDBG Office funded the Latino Chamber of Commerce, WWBIC and Madison Development Corporation to help meet these goals. The funding for these agencies will also continue into 2010. The CDBG Office recognizes the importance of micro-enterprise development especially in the current economy where jobs are being lost and new micro-enterprises are being considered and started.

Consultations and Other Agency Involvement

The Community Development Division, in coordination with the CDBG Committee, developed the Consolidated Plan with consultation from diverse groups and organizations. Group and individual meetings, emails and telephone discussions were all had to solicit information and feedback from the following groups:

- CDBG Committee
- Affordable housing developers and providers
- Non-profit and for-profit economic development groups
- The Homelessness Services Consortium
- Madison Metropolitan School District
- Dane County
- Milwaukee Metropolitan Fair Housing
- Public Health
- Social service agencies
- City of Madison Leadership and other departments (i.e. Building Inspection, Civil Rights)
- United Way
- Madison Area Builders
- La Sup (Latino Support Group)
- Chamber of Commerce
- South Central Federation of Labor
- City of Madison Community Development Authority
- State of Wisconsin
- Department of Planning and Metro. Planning

Throughout these discussions several themes emerged which supported the drafted goals and objectives for the Community Development Division. Affordable housing for renters and buyers, job creation, employee and business development, access to resources, and community focal points (i.e. neighborhood centers) were identified as current and emerging needs in the City of Madison. In addition, the need for continued coordination and collaboration between agencies, local governments, other funders, other City agencies and the schools was also discussed.

These entities were all notified when the draft Consolidated Plan became available to provide further comment. No additional comments were made.

30 Day Public Comment Period

The Draft 2010-2014 Consolidated Plan was made available to City of Madison residents both electronically and in hard copy. The paper format was available at all of the Madison Libraries, the CDBG Office and various social services agencies. No additional comments to those stated above were made.

Conclusion:

The City will continue to work with citizens, agency partners, stakeholders and other City of Madison Departments to develop policies and fund programs to best meet the goals and objectives outlined in this 5-Year Consolidated Plan. The CDBG Office recognizes the importance of community feedback to build on successes and improve effectiveness.

City of Madison

Citizen Participation Plan

A. PURPOSE

The City of Madison Community Development Program welcomes and encourages the participation of Madison citizens in the development, implementation, and evaluation of its HUD-funded Community Development Program. The major intent of this plan is to outline the opportunities for Madison residents, especially those living in low- and moderate income neighborhoods, or participating institutions, businesses and community organizations, to help shape the activities of the Community Development Program.

Since 1986, CDBG has actively sought the involvement of Madison citizens in its community needs assessment and planning. From 1986 to 1996, the needs assessment involved seven to eight 'panels' including five to ten citizens, public officials, and members of various funding bodies. The groups analyzed information, trends, citizen survey and focus group responses, and public hearings to develop recommendations for each area. As the program progressed, the City included more public funding bodies in the process to develop a more comprehensive look at community needs. While still honoring this comprehensive approach, the CDBG office also uses information gathered on a day to day basis through its operation of funded projects.

While the structure of the CDBG office allows for ongoing participation of these individuals and groups, the Citizen Participation Plan applies to seven areas that the CDBG office oversees; (1) CDBG Committee Meetings and Regular Public Hearings; (2) Two-Year Funding Framework; (3) Development of the Five-Year Consolidated Plan; (4) One-Year Action Plan; (5) substantial amendments to the Consolidated or Action Plans; (6) Consolidated Annual Performance and Evaluation Report (CAPER); (7) amendments to the Citizen Participation Plan. HUD requires citizens have an opportunity to review or comment on the development and drafts of these documents to allocate funding to the jurisdiction. The document outlines how Madison residents may participate in these seven key areas.

B. CITIZEN PARTICIPATION PLAN

CDBG Committee Meetings and Public Hearings

The City has established a nine-member CDBG Committee formed by citizens and elected officials. The Committee discusses on-going issues of the program's operations, recommends funding for particular projects and oversees the development of all HUD projects. Additionally, the Committee provides an opportunity for continuous citizen and organization participation through regular meetings and public hearings.

The Committee has at least one meeting each month. All Committee meetings are publically noticed and open meetings, operated in a manner that permits citizen comments. These meetings follow the public meeting notice requirements outlined under the "Notifications" section of the Citizen Participation Plan. The

Committee keeps written and public minutes of its meetings, and has organized certain key public documents, such brochures, its annual objectives, and its Consolidated Annual Plan Evaluation Report (CAPER), so that the information is available through staff in the Mayor's office, and in the Department of Planning and Development. The CDBG Office also has a website containing these documents.

In addition to its monthly meetings, the Committee holds a minimum of two public hearings each year. Generally, the hearings are held to obtain citizens' views on housing and community development needs, development of proposed activities, and review of program performance. However, the agenda for the hearings may be specifically targeted if it is a funding or consolidated planning year. The hearings follow the requirements outlined in the "Notifications" section of this document.

CDBG staff themselves participate in community-based meetings and task forces to continuously explore and obtain feedback on issues involved in implementing a sound community development program. Staff (and some Committee Members) are involved in such meetings with the Homeless Services Consortium (the Dane County Consortium), the Third Sector Housing Group, Neighborhood Resource Teams, and such ad hoc groups as the South Madison Steering Committee, the Housing Committee, Housing Diversity Planning Committee, and the Community Gardens Committee. These meetings serve as important sources of information about working with members of the target population.

Two-Year Funding Framework

The CDBG Office sets its Program Funding Framework to cover each two year period. The goals and objectives of the two year period are derived from the CDBG Office's Five-Year Plan and support other Department and Citywide strategic goals, objectives and allocation processes.

The CDBG Office develops a separate calendar and detailed explanation of the funding process. To encourage active participation and understanding in this process, the City and other funding bodies hold workshops on how to apply for funding. The CDBG Office also outlines and distributes the opportunities for participation by citizens and applicant agencies through mailings, public meetings, CDBG Office web site, and alderpersons. Workshops and other meetings are held in accessible buildings located in neighborhoods with high concentrations of low and moderate income persons, and are advertised in the City's major newspapers and many community organizations' newsletters. All meetings and hearings follow the "Notifications" section of this document.

Development of Five-Year Consolidated Plan

The Consolidated Plan is developed through a collaborative process to establish a longer term vision for Madison's community development goals and objectives. Participation from citizens, community agencies the public housing authority and other interested stakeholders is an important part of the process. Individual consultations, public meetings and hearings, occasional public surveys and written comments are incorporated into the participation strategy. The CDBG Office makes a special effort to reach out to the citizens residing in CDBG-funded or targeted neighborhoods for their ongoing input into the consolidated plan. Additionally, the office encourages the participation of all residents, including

minorities, the non-English speaking population, and persons with disabilities. This section outlines the steps for public participation in the Five-Year Consolidated Plan.

1. Individual Consultations

Before drafting the Five-Year Plan, the City receives input from various community institutions. Many of these agencies have continuous and frequent contact with the CDBG Program and Committee. CDBG staff meets with public and private, non-profit and for-profit agencies and community organizations to specifically discuss the Five-Year Plan. These consultations may be through individual meetings, task force or neighborhood meetings or other means. The purpose is to gain input and data that will guide the development of the goals and objectives in the Five-Year Plan.

2. Citizen Input: Public Hearings and 30 Day Comment Period

Citizens are encouraged to provide input into the Five-Year Plan through Public Hearings and the Comment Period. In addition to an opportunity to indicate community needs that should be reflected in the objectives of the plan, citizens may comment on the draft plan before it is finalized. The plan will include information on the amount of assistance the City expects to receive and the range of activities that may be undertaken. Any comments received through public hearings or the comment period will be recorded and addressed in the Five-Year Plan.

Public Hearings:

The CDBG Office holds at least two public hearings to provide an opportunity for input by Madison residents, especially residents who are low-income or in targeted neighborhoods, in the Five-Year Plan. The first hearing is held to gather information on community needs from citizens. The second hearing is to receive oral comments on the draft Consolidated Plan, prepared by CDBG staff. The public hearing is advertised to citizens following the "Notifications" section of this document. The publication includes a summary of the plan that includes the contents and purpose of the consolidated plan.

Comment Period:

Citizens are also given a 30-day period to submit comments on the draft plan.

The comment period starts when the draft is published, two weeks before the public hearing. It is available to citizens at various locations, including public libraries, specified neighborhood agencies, the CDBG office and website and other public gathering spots. Notification of the draft plan and the designated locations will be published in the main newspaper as well as other publications that target minority, special needs or target neighborhood populations. Additionally, the CDBG office will provide a reasonable number of free copies of the plan to citizens and groups that request it.

3. Final Consolidated Plan

The plan includes a summary of all written or oral testimony that will be considered in the final Consolidated Plan. Additionally, the plan will provide reasons for any comments or views not accepted. The final plan is reviewed and approved by the CDBG Committee, City Board of Estimates and City Common Council. The plan is submitted to HUD no later than 45 days before the start of the program year.

One-Year Action Plan

Each year an Action Plan and Consolidated Annual Plan Evaluation Report is submitted to HUD. The Action Plan outlines the funding allocations that will be used to achieve the objectives outlined in the Consolidated Plan. During the development of the Action Plan, there is a public hearing held in conjunction with a CDBG Committee meeting. The public hearing follows the publication requirements outlined in the "Notifications" section of this document. In addition to the public hearing, the Action Plan is published for at least 15 days for written public comment. The final plan is approved by the CDBG Committee, City Board of Estimates and City Common Council before it is submitted to HUD.

Substantial Amendments

The Citizen Participation Plan allows for "substantial amendments" to the One-Year Action Plan or Five-Year Consolidated Plans. Substantial amendments only apply to the changes in the use of CDBG funds, from one eligible activity to another. The CDBG office defines a substantial amendment as:

"Any change in the allocation or distribution of funds, activity, or recipient and the dollar amount of that change is equal to or greater than 25% of the current fiscal year federal allocation."

If there is a proposed substantial amendment to the Consolidated or Action Plan, the CDBG staff will draft the amendment. A brief summary of the change will be published and identify where the full document can be reviewed. Once noticed, the public may review the document for 30 days and provide written comment to the CDBG office. During the 30 day comment period, a public hearing will be held at a CDBG Committee meeting to allow for oral citizen input. The hearing will follow the "Notifications" section of this document.

The final amendment includes a summary of and response to all citizen comments that were received. The amendment must be approved by the CDBG Committee, City Board of Estimates and City Common Council.

Consolidated Annual Performance and Evaluation Report (CAPER)

The CDBG Office encourages citizen participation and input in the Consolidated Annual Performance and Evaluation Report (CAPER). There is one public hearing on the CAPER held near the time of its submission. This meeting is publicly noticed, held as part of a regularly scheduled Committee meeting, and encourages citizen comment about the program. The hearing follows the "Notifications" section of this document.

The draft CAPER is published for at least 15 days to receive comments on the performance report before it is submitted to HUD. The final report considers any comments received in writing or orally at public hearings and includes a summary of all these comments. The draft is available to citizens at various locations, including public libraries, specified neighborhood centers, the CDBG office and website and other public gathering spots.

The final CAPER includes a summary of and response to all citizen comment received orally or in writing. The CAPER is approved by the CDBG Committee, City Board of Estimates and City Common Council before it is submitted to HUD.

Substantial Amendments to Citizen Participation Plan

If changes to the Citizen Participation Plan are necessary, the changes will be drafted by the CDBG staff and reviewed by the Committee. The Committee meeting held to review the changes will incorporate a public hearing to afford citizens the opportunity for oral comment. This meeting will follow the procedure outlined in the "Notifications" section. After reasonable notice, the draft will also be available to the public for a minimum of 15 days for written comment.

The updated Citizen Participation Plan considers all the written or oral comments received before it is adopted.

C. GENERAL REQUIREMENTS

Public Hearings

At least two (2) public hearings are held each year to obtain feedback and input from Madison citizens, public agencies, and other interested parties on the housing and community development needs for the City. Any public hearing before the CDBG Committee or other appropriate organizations or groups are advertised as outlined in the "Notifications" section below.

Public Meetings

All CDBG Committee and Subcommittee meetings are public and open meetings. Any open meetings must meet the requirements outlined in the "Notification" section below.

Notifications

Advance notice of all public meetings and hearings are provided to residents in compliance with governing regulations.

Public notice of **open meetings** shall be given at least 24 hours prior notice and set forth the time, date, place and subject matter of the meeting as required by the City of Madison General Ordinances. The notice, agenda and minutes of all open meetings are submitted to the City Clerk and posted on the City website. Additionally, citizens may obtain CDBG specific information on the CDBG website.

At least two weeks' notice is provided for any **public hearing** as required by HUD. Notice is provided by posting on the City website through the City Clerk. Citizens may also view this information on the CDBG website.

In addition to posting on the City website, Citizens receive additional notice for public hearings related to the Consolidated Plan/Action Plan or substantial amendments. Ads are published in the local newspaper for general circulation and appear in English and/or Spanish or Hmong, if more appropriate. These ads appear for at least two weeks prior to any public hearing or comment period. The ads include a notice of the hearing, a summary of the relevant documents, process for public comment and a list of locations where relevant documents may be reviewed.

Accommodation

All public meetings and hearings are held in locations that are held at times and locations convenient to lower income individuals and are accessible to persons

with disabilities. Upon request, translation for non-English speaking residents and/or those who are hearing impaired will be provided. These or other provisions necessary to accommodate residents may be available if requested at least five working days prior to a hearing or meeting. The CDBG office makes an effort to hold at least one meeting (either regular monthly meeting or public hearing) per year at a location where CDBG funds are directed or other low-income area.

Document Access

Upon request, copies of all planning documents are available to the public. The Consolidated Plan, Action Plan, Consolidated Annual Plan Evaluation Report, Citizen Participation Plan and other documents are posted on the CDBG website. The public has the opportunity to review these documents while in draft form to incorporate citizen comments and input into the final document. Draft documents will be available at several locations throughout the city. The list is published in the public hearing ad, but generally includes public libraries, neighborhood agencies, the CDBG office, public housing authorities and other non-profit organizations offices. Citizens may contact the CDBG office to obtain a copy of the written documents. Upon request, the documents can be obtained in a form accessible to persons with disabilities.

Access to Records

Upon request, citizens, public agencies, and other interested parties will be provided reasonable and timely access to information and records relating to the consolidated plan, citizen participation plan, performance reports, and the City's use of assistance awarded under grant programs.

Technical Assistance

Technical assistance can be provided to neighborhoods targeted by CDBG funds or other low-income areas that need assistance preparing funding proposals or participating in the consolidated planning process. Assistance may be limited to the extent that staff or other resources are available or if prohibited by federal or city rules or regulations. This provision does not involve the use of City equipment, reassignment of City staff to the proposed group or project or guarantee an award of funds.

Complaints

The CDBG staff is responsible for receiving and responding in writing to citizen complaints regarding any HUD program or activity, including the Consolidated Plan, amendments and the Consolidated Annual Plan Evaluation Report. Staff will provide a substantive, written response to the complainant within 15 working days, where practicable. If the response cannot be prepared within 15 days, the complainant will be notified of the delay and the approximate date the response will be provided.

Complaints should be addressed to:

City of Madison
CDBG Office
Room 280, Madison Municipal Building
215 Martin Luther King, Jr. Blvd.
PO Box 2985 · Madison, Wisconsin 53701-2985

OR

cdbg@cityofmadison.com

FINAL DRAFT

CITIZEN PARTICIPATION PLAN
ANTI-DISPLACEMENT POLICY FOR PROJECTS ASSISTED WITH
CITY OF MADISON
COMMUNITY DEVELOPMENT DIVISION FUNDS
2010-2014

The City of Madison will design its Community Development program to minimize both direct and indirect displacement of residents in the achievement of its community development objectives.

The City will adhere to the benefit levels and procedures which have been adopted by the Department of Housing and Urban Development, for its implementation of the Uniform Relocation Assistance and Real Property Acquisition Policies Act at 49 CFR Part 24, and for its implementation of the Department of Housing and Urban Development Regulations 24 CFR 570.606. The City will apply those benefit standards to both private and public agencies receiving Community Development funds, as required by the 1984 amendments to the Housing and Community Development Act and the Federal Highway Administration Final Rule published on January 4, 2005.

All sub-recipients shall design their CDBG-assisted activities to minimize both direct and indirect displacement of persons in the implementation of its projects, either through judicious choice of project locations, or through the provision of facilitating assistance for continued residency within the project locations. The sub-recipients will adhere to the benefit levels and procedures which have been adopted by the Department of Housing and Urban Development, by the City of Madison and by the State of Wisconsin, whichever are greater, for their implementation of the Uniform Relocation Assistance and Real Property Acquisition Policies Act. As such, sub-recipients must file relocation plans as required by the State of Wisconsin, and the City of Madison's Community Development program.

Section 104 of the Housing and Community Development Act requires that reasonable benefits be provided to persons permanently and involuntarily displaced as a result of the use of assistance received under the Act to acquire or substantially rehabilitate property, even where such displacement is not covered by the Uniform Act because it is carried out by a non-state agency.

Hence, sub-recipients of CDBG funds will:

1. Design their acquisition and/or rehabilitation plans so as to minimize displacement of occupants of the targeted property;
2. Inform, in writing, each person who may be displaced, that she/he may be displaced; describe the relocation assistance for which the person may be eligible; indicate the procedures to be followed to obtain the assistance; and provide each person who may be displaced with the State of Wisconsin Relocation Rights brochure (ERD-7323); and
3. Provide reasonable relocation benefits to "displaced persons" according to the standards and guidelines articulated below.

To be eligible for relocation assistance, a tenant must fit into one of the two categories listed below:

- Category 1 A tenant must be a renter family, individual, business, nonprofit organization, or farm, which is legally occupying the property at the time the subrecipient enters into a contract (with the private owner or developer) contingent upon City assistance for the acquisition or rehabilitation (a contract shall include options to purchase, land contracts, or other formal agreements to occupy the property); **OR**
- Category 2. A tenant must be a renter family, individual, business, non-profit organization, or farm, which legally moves into the property between the time when the contractor enters into initial negotiations for acquisition or renovation rehabilitation when the acquisition/renovation occurs, WITHOUT receiving prior written notice by the agency of his or her possible displacement as a result of the planned acquisition or rehabilitation.

Sub-recipients will provide relocation assistance to any residential tenant who is determined under the above standards to be displaced as a direct result of the rehabilitation or acquisition. Relocation assistance, at a minimum, must include:

1. Reasonable moving expenses, as delineated in Federal Rule 49 C.F.R. 24.301, and State Statutes and Codes;
2. Advisory services needed to help in relocation;
3. Referral to at least one suitable, decent, safe, and sanitary replacement dwelling unit;
4. Notification of, tenants' rights under the Federal Fair Housing law (Title VIII) and replacement housing opportunities, in such a manner that whenever feasible, tenant will have a choice between relocating within their neighborhood and other neighborhoods, consistent with the City's responsibility to affirmatively further fair housing. Such notice shall include referral to the Community Action Committee's Housing Information Service; and
5. One payment equal to 42, 48, or 60 times (depending on which rule applies, URA or HCD Sec. 104(d), or the State of Wisconsin) the increase, if any, between the monthly cost of rent and utilities at the dwelling unit from which the tenant is displaced, and the cost of rent and utilities for a suitable, decent, safe, and sanitary replacement dwelling unit, **OR** the provision of a certificate of housing voucher for rental assistance payments under the Section 8 Housing Assistance payment program, if the tenant is an eligible lower income person.

Sub-recipients will provide relocation assistance to any business, non-profit or farm which qualifies as a displaced person. These benefits may include:

1. Transportation of personal property;
2. Packing, crating, uncrating and unpacking of personal property;
3. Disconnecting, dismantling, removing, reinstalling machinery, equipment, etc.;

4. Storage of personal property for a period not to exceed 12 months;
5. Insurance for the property in connection with the move;
6. Any license, permit, or certification required of the displaced person at the replacement location;
7. Re-lettering signs, and replacing stationary;
8. Actual direct loss of tangible personal property;
9. Purchase of substitute personal property;
10. Searching for a replacement location;
11. Reestablishment expenses;
12. Advertising signs; and
13. Payments designed to offset the increase, if any, between the monthly cost of rent, and the utilities at unit from which the tenant is displaced and the cost of the replacement unit.

Section 104(d) of the Housing and Community Development Act

Additionally, under Sec.104(d) of the Housing and Community Development Act of 1974 as amended, and HUD program regulation 24 C.F.R. 570.606(c), the term "displaced persons" means any lower income family or individual that moves from real property, or moves his or her personal property from real property, permanently and involuntarily, as a direct result of the conversion of an occupied or vacant occupiable low/moderate-income dwelling unit (defined as one where the rent is currently less than the Fair Market Rent for Section 8 Existing Housing for the City of Madison), or the demolition of any dwelling unit, in connection with an assisted activity.

Section 104(d) of the Housing and Community Development Act of 1974 as amended, and HUD program regulation 24 C.F.R. 570.606(c) provides that, as a condition for receiving assistance under the CDBG program, the grantee must certify that it is following a residential anti-displacement and relocation assistance plan which contains two major requirements:

1. Replace all occupied and vacant occupiable low/moderate-income dwelling units that are demolished or converted to a use other than low/moderate-income housing in connection with an activity assisted under the Housing and Community Development Act (see 24 C.F.R. 270.606(c)(1), on a one-for-one basis; and
2. Provide certain relocation assistance to any lower income person displaced as a direct result of the demolition of any dwelling unit **OR** the conversion of a low/moderate-income dwelling unit to a use other than a low/moderate-income dwelling in connection with an assisted activity.

Each sub-recipient must submit such a plan to the CDBG Office for approval before finalizing the acquisition/rehabilitation.

All occupied and vacant occupiable low/moderate-income dwelling units, defined as those units with a market rent that does not exceed the HUD established Fair Market Rent for Section 8 existing housing, that are demolished or converted to a use other than as low/moderate-income dwelling units as a direct result of an activity assisted under this part must

be replaced by governmental agencies or private developers with low/moderate-income dwelling units. Replacement low/moderate income dwelling units may include public housing, or existing housing receiving Section 8 project-based assistance under the United States Housing Act of 1937. The replacement low/moderate-income dwelling units must be provided within three years of the commencement of the demolition or rehabilitation related to the conversion, and must meet the following requirements:

1. The units must be located within the grantee's jurisdiction;
2. The units must be sufficient in number and size to house at least the number of occupants that could have been housed in the units that are demolished or converted. The number of occupants that may be housed in units shall be determined in accordance with local housing occupancy codes;
3. The units must be provided in standard condition. Replacement low/moderate-income dwelling units may include units that have been raised to standard from substandard condition; and
4. The units must be designed to remain low/moderate-income dwelling units for at least 10 years from the date of initial occupancy.

Before obligating or expending funds provided under this part for any activity that will directly result in the demolition of low/moderate-income dwelling units or the conversion of low/moderate-income dwelling units to another use, the sub-recipient must make public, and submit the following information in writing to the CDBG Office for submittal to HUD:

1. A description of the proposed assisted activity;
2. The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than for low/moderate-income dwelling units as a direct result of the assisted activity;
3. A time schedule for the commencement and completion of the demolition or conversion;
4. The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units;
5. The source of funding and a time schedule for the provision of replacement dwelling units;
6. The basis for concluding that each replacement dwelling unit will remain a low/moderate-income dwelling unit for at least 10 years from the date of initial occupancy;
7. A plan detailing the steps the contractor will follow to minimize the displacement of persons from their homes; and
8. A copy of the agency's State of Wisconsin Relocation Plan.

If a person disagrees with the sub-recipient's determination concerning the person's eligibility for, or the amount of relocation payment under this policy, the person may file a written appeal of that determination with the City

CDBG Office. The appeal procedures shall follow those described in 49 CFR 24.10.

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