



Fourth Program Year 2013 Action Plan

The CPMP 2013 Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. As of May 2006, the Executive Summary narratives are required.

Narrative Responses

GENERAL

GRANTEE: City of Green Bay
CON PLAN PERIOD: 2010 to 2014

Executive Summary (92.220(b))

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

PY 2013 Action Plan Executive Summary:

The Community Development Block Grant program was established by Congress in 1974. This program provides funds to municipalities and other units of government around the country to develop viable urban communities. This is accomplished by providing affordable, decent housing, a suitable living environment and expanding economic opportunities principally for low and moderate income persons. Each local unit of government develops their own programs and funding priorities but all activities must be consistent with one or more of the following HUD national objectives:

- ✓ **Benefit to low- and moderate- income (LMI) persons**
- ✓ **Aid in the prevention or elimination of slum and blight; and**
- ✓ **Meet an urgent need**

As a recipient of these funds, each year the City of Green Bay is required to submit to HUD an Action Plan based on its 5-Year Consolidated Plan and Strategy. The plan defines the direction the City will take in implementing the Federal funds to address the national objectives and produce the greatest measurable impact in the Community.

In 2006, the Neighborhood Division staff began an extensive review of the City's allocation process and determined that in order to be most effective with federal funds, specific areas of the City would be targeted (Impact Areas) to receive multi-year CDBG and HOME funding. By focusing on smaller areas, a stronger visual and social impact will occur in a shorter timeframe.

The City of Green Bay will continue its efforts to implement Impact Areas that reflect areas of need in targeted neighborhoods in 2013.

In accordance with the Cities 5-year Consolidated Plan and Strategy, in 2013 the City, using Neighborhood Division staff, will coordinate its efforts with other City departments, community groups, and neighborhood residents in order to accomplish these goals:

- **Increase quality, affordable housing**
- **Increase Economic Development Opportunities**
- **Crime Prevention**

In addition to these goals, as part of the citizen participation process and input received on community development and housing needs, the City will be coordinating efforts to make grants available to local non-profit agencies through a competitive review of proposals for public service activities that support the goals through, but not limited to the following; Youth Development activities that support; education and job training; Homelessness activities that focus on essential service activities; such as drop-in centers/day shelters, and street outreach to inform homeless persons about the availability of shelter, housing search assistance, medical and psychological counseling, job training and placement, substance abuse treatment and counseling, nutrition assistance, childcare, transportation, and assistance in obtaining other federal, state, and local benefits and services.

In recent years, the City of Green Bay has utilized Impact Areas plans to maximize the impact of federal funding in LMI areas within the City. The Impact Area approach has been very successful and widely considered a strategy worth continuing locally. Most of the activities in the impact areas focused on residential real estate activities such as acquisition of deteriorated housing, homeowner rehabilitation and homebuyer assistance. There are some other programs, however, that were also utilized in both the smaller impact areas as well as CDBG area wide. These include the following:

- **Juvenile Crime Prevention:** Programs dealing specifically with the prevention of juvenile crime within the designated Impact areas.
- **Community Service Interns:** While interns will work CDBG area wide, their focus is within Impact areas. This program has been a very successful component of decreasing crime in the City's

core neighborhoods. Interns assist the police department by attending neighborhood events, picking up found bicycles and logging them into police evidence, conducting vacation checks for residents gone for extended periods of time, providing translation services, making referrals to inspection, and creating a police presence in downtown neighborhoods.

- **Homeownership Counseling:** This program has been an important component of promoting homeownership in CDBG areas for several years. The program provides direct counseling for low-to-moderate income prospective and current homeowners. Counseling includes weekly classroom instruction, monthly seminars and individual counseling on a walk-in or appointment basis.
- **Fair Housing Services:** As both a HUD mandate and an important component to affirmatively furthering fair housing choice, fair housing service activities under this project include educational services through presentations and direct assistance, managing fair housing complaints, and distribution of information of fair housing laws and illegal discrimination.
- **Parks Projects:** Parks project activities have been funded to improve LMI parks within the Impact Areas and City wide.
- **Alleys and Sidewalks:** The Department of Public Works (DPW) has worked in designated Impact Areas to resurface alleys, which are reaching an age where resurfacing is necessary, eliminate trip hazards on sidewalks caused by tree roots and make improvements to ensure sidewalks are ADA accessible.
- **Neighborhood Preservation Inspector:** Minor inspection violations such as junk, trash, pet waste, grass and weed control and vehicles in the front yard are a major problem in Impact Areas. The City of Green Bay funded a full-time inspection position that is responsible for performing inspections and conducting problem resolution in these areas.
- **Economic Development Revolving Loan Fund:** This program has been used to provide low- interest rate loans program which serve as gap financing, to for-profit companies city wide as long as business owners commit to creating full-time equivalent positions for low to moderate-income individuals.

Action Plan Required Elements:

Geographic Distribution/Allocation Priorities:

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

*Please note that maps or other attachments may be included as additional files within the CPMP Tool.

PY 2013 Action Plan Geographic Distribution/Allocation response:

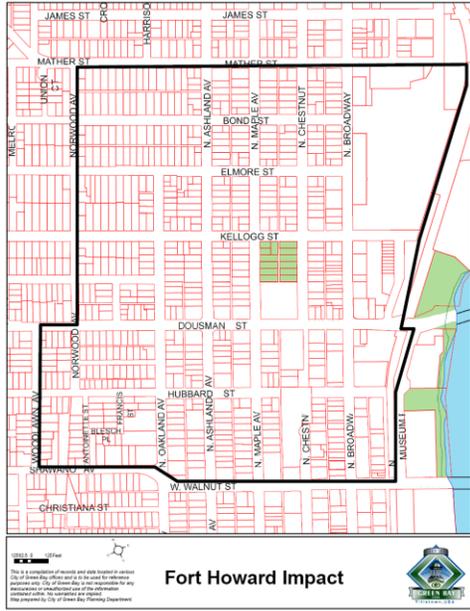
At the 2010 Census, there were 104,057 people residing in Green Bay, an increase of 1.7% since 2000.

According to the 2010 Census, 73.3% of the population was non-Hispanic White, 3.4% non-Hispanic Black or African American, 3.6% non-Hispanic American Indian and Alaska Native, 4.0% non-Hispanic Asian, 0.1% from some other race (non-Hispanic) and 2.2% of two or more races (non-Hispanic). 13.4% of Green Bay's population was of Hispanic, Latino, or Spanish origin (they may be of any race).

The median income for a household in the city was \$42,899, and the median income for a family was \$48,678. The per capita income for the city was \$23,370. About 15.5% of people all ages were in poverty.

The number of minority races and ethnicities in Green Bay has increased considerably. Almost 28% of Green Bay's population is now made up of ethnic and racial minority populations. All Census Tracts that contain a higher percentage of minorities than the City as a whole are also 51% LMI or more.

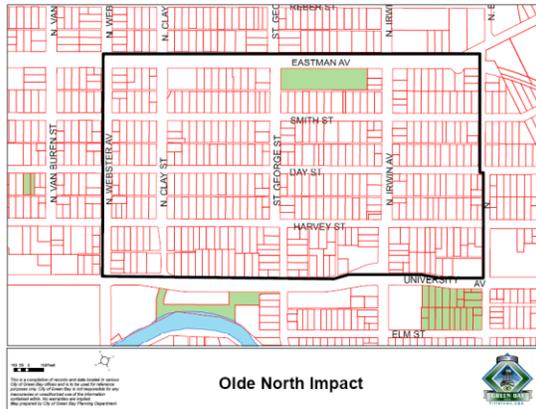
The City of Green Bay allocates funding to impact areas within Green Bay's LMI neighborhoods. There are five specific impact areas that the City has focusing on: Olde North, Navarino, and Imperial Lane on the East Side of the Fox River and Seymour and Fort Howard on the West Side. These areas contain some of the most deteriorated housing stock in the City, extremely high concentrations of LMI households, and above-average crime rates. The impact areas also have very low homeowner rates and higher than average rates of inspection violations. These areas were also chosen due to economic development opportunities and their close proximity to schools and parks. Maps of the impact areas are as follows:



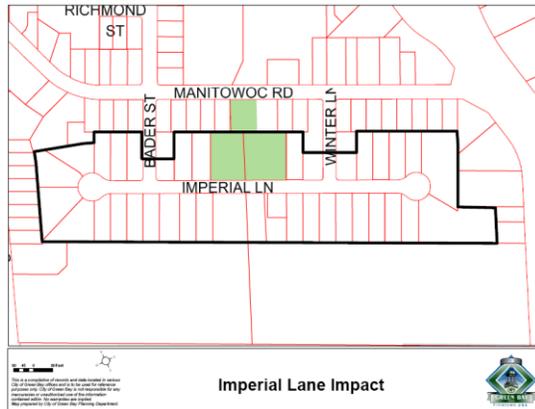
Fort Howard Impact



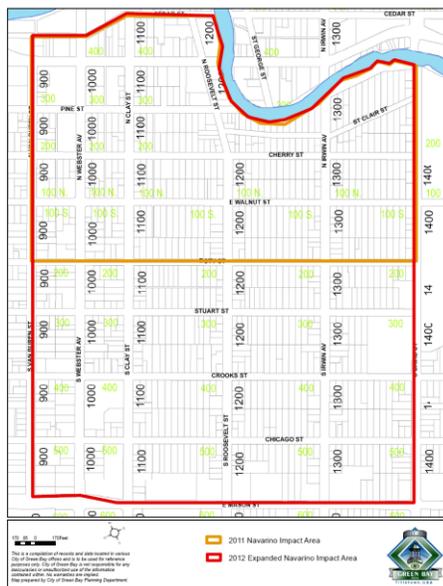
Seymour Impact



Olde North Impact



Imperial Lane Impact



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

PY 2013 Action Plan Geographic Distribution/Allocation response:

Revitalization of LMI areas within the City remains a top priority for City staff. Besides having the largest concentrations of urban poor, these areas also have the oldest and most deteriorated housing stock. Housing in these areas has varied residential uses including single-family, two-family, and small apartments. Conversion of single- and two-family houses into multiple apartments has led to overcrowding, lack of parking, and deterioration of housing.

Typically, older housing is less expensive, but it is also more likely to have maintenance issues and likely to be less energy efficient than newer homes. There is also the likelihood that older housing will contain some type of health hazard such as lead paint or asbestos. Low-income households have the highest incidence of housing problems. They are 2 to 3 times more likely to have some type of housing problem compared to the City as a whole. Since a disproportionate number of low-income households are concentrated in near downtown neighborhoods, it can be assumed that the inadequate housing they are living in is older housing.

In order to really make a difference in these areas and help restore vibrant and strong neighborhoods, many of the City's programs, both CDBG and HOME funded, will be targeted to the five Impact Areas shown above.

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

PY 2013 Action Plan Geographic Distribution/Allocation response:

Reductions to funding levels have remained the City's main obstacle to meeting the needs of underserved populations. As funding levels decrease, so does the level of funding that can be provided in the designated Impact Areas for revitalizing deteriorated housing stock and providing public services activities to underserved LMI populations. In an effort to overcome this obstacle the City has adopted the Impact Area concept to concentrate its 2013 CDBG and HOME entitlement allocation in the hopes of making a significant impact in these areas.

Sources of Funds:

- 5. Identify the federal, state, and local resources the jurisdiction expects to receive to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan. (92.220(c)(1))**

PY 2013 Action Plan Sources of Funds response:

In addition to the anticipated CDBG and HOME entitlement allocation the City receives from HUD to address the needs expressed in this plan, the following resources may also be received by the community:

Federal:	HOME; CDBG; Section 8 HCV Program; NSPI
State:	Weatherization Program; WHEDA Loan Program
Local:	Neighborhood Enhancement Funds
Private:	Matching bank loan funds for rehabilitation activities

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

PY 2013 Action Plan Sources of Funds response:

The City has designated five Impact Areas within the City of Green Bay to target 80% of its CDBG and HOME entitlement allocation. The five specific impact areas that the City has been focusing on are Olde North, Navarino, and Imperial Lane on the East Side of the Fox River and Seymour and Fort Howard on the West Side. Maps of the impact areas are shown on page 3 and 4.

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

PY 2013 Action Plan Sources of Funds response:

The City's 2013 Action Plan does not include a Neighborhood Revitalization Strategy Area.

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

PY 2013 Action Plan Sources of Funds response:

The City will work with nonprofit agencies, neighborhood associations, businesses, and public sector partners to leverage its federal funds. Through the

efforts of the Green Bay Neighborhood Leadership Council, local neighborhood associations are provided funds for neighborhood improvement projects and public service activities within CDBG eligible areas. Additionally, the City of Green Bay uses a local funding source called Neighborhood Enhancement to assist with blight elimination projects within the targeted impact neighborhoods. The HOME Housing Rehab program, HOME Homebuyer Assistance and CHDO projects all leverage private sector funds in the form of rehabilitation loans, mortgages, and construction financing. Lastly, numerous nonprofit and business partners are working towards the same goals and priorities identified in this plan.

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

PY 2013 Action Plan Sources of Funds response:

The City of Green Bay fulfills its matching requirements through the repayments of HOME funded Rental Rehabilitation loans and Habitat for Humanity's donation of labor and materials.

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

PY 2013 Action Plan Sources of Funds response:

In carrying out the focus of the 2013 Action Plan, the City is proposing to work with the Green Bay Parks Department to allocate \$150,000 of the City's 2013 CDBG entitlement funds to improve a small neighborhood park located in one of the Impact areas and pave a walkway in an LMI neighborhood that will help connect the neighborhood to shopping and schools.

Managing the Process

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

PY 2013 Action Plan Managing the Process response:

The Redevelopment Authority of the City of Green Bay (RDA) is the lead agency for the City of Green Bay responsible for the coordination, administration and writing of the 5-Year Consolidated Plan and Strategy and Action Plans. Once these plans are approved by the U.S. Department of Housing and Urban Development (HUD), the RDA manages the activities implemented to meet the goals of the plan.

The process of developing the 2013 Action Plan involved many contributors, including City staff, local agencies, neighborhood associations and the public. The goals set-up for the 2013 Plan have been discussed since early 2012 during meetings of department and division heads, including Planning; Public Works; Parks, Recreation & Forestry; Economic Development; Police; and Neighborhoods. The meetings were established to discuss current and proposed projects with housing providers and community groups to ensure that the greatest needs of the community are being met adequately. To receive input from neighborhoods the neighborhood staff distributed a needs survey to 33 neighborhood association leaders at a monthly meeting. Further, all social service agencies, housing providers, and community groups were invited to attend a public hearing on August 30, 2012, to provide testimony on housing and other community needs and problems. After the meetings were held, funding recommendations and goals for 2013 were sent to the RDA for discussion and approval. Upon their review, recommendations are made to the Common Council for final approval.

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

PY 2013 Action Plan Managing the Process response:

To enhance coordination between public and private housing, health and social service agencies, staff intends on holding additional public meetings with direct invitations to inform the public about the planning process and to provide additional opportunities to hear input on the 2014 Action Plan. Additional opportunities and direct invitations to key agencies in our community should improve the amount and quality of public input received on the plan.

Citizen Participation (91.220(b))

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

PY 2013 Action Plan Citizen Participation response:

Citizens of Green Bay are welcome and encouraged to attend meetings of the Redevelopment Authority of the City of Green Bay and/or the Common Council, as community development-related items arise throughout the program year. On an annual basis, however, input is specifically sought in the following manners:

- A. Public hearings are held to obtain citizen views and to respond to proposals and questions, including the development of needs, the review of proposed activities, and review of program performance.
1. Public hearings will be held at times convenient to potential or actual beneficiaries. Therefore, to maximize participation, public hearings will be held during weekday evenings.
 2. City Hall meeting rooms will be used whenever feasible. Accommodations for persons with disabilities will be made upon request. Requests require 24-hour notice to the Mayor's Office at (920) 448-3005.
 3. A notice of public hearing will be published in the City's official paper, or other paper of significant local circulation, one to two weeks in advance. Two weeks' notice is desirable.
 4. When non-English speaking residents are reasonably expected to participate, arrangements will be made to have an interpreter present.
 5. At least two public hearings will be held during the program year to obtain views and comments from citizens, public agencies, and other interested parties in regard to the following:
 - a) Identification of housing and community development needs.
 - b) Review of proposed uses of funds.
 - c) Review of program performance.

A formal public hearing on community development needs was conducted on August 30, 2012 at 100 North Jefferson Street, Room 608, Green Bay WI 54301. A legal notice for this hearing was published in the Green Bay Press Gazette on August 8, 2012. Below are the minutes from that meeting:

**Public Hearing on 2013 AAP
August 30, 2012
Room 604, City Hall
5:00 p.m.**

STAFF PRESENT: Krista Baeten, Andy Rosendahl

OTHERS PRESENT: Noel Halvorsen, Paul Van Handel, Jane Shatswell, Alexia Wood

K. Baeten opened the public hearing to hear about the needs of the community for the 2013 Annual Action Plan process. K. Baeten provided a background on Community Development

Block Grant and the HOME Investment Partnership Program. The meeting was opened for public input.

Paul Van Handel, from the Green Bay Police Department, has been working with Jane Shatswell from Wellspring and Alexia Wood from St. John's Shelter on identifying a problem in the area with homelessness, alcoholism, and other needs. In 2011, the Green Bay Police Department spent 159,147 minutes or 2,652.45 hours on calls dealing with homelessness and alcohol; 3,707 times officers went out on these calls. Of the time spent in 2011, police had 185 alcohol holds. Paul Van Handel described the various scenarios that lead to alcohol holds. During a hold, the person goes to the Brown County Mental Health Treatment Center and that person stays there for no longer than 12 hours, or until they are below a .04 BAC. There is a cost that goes along with this. Of all of the calls and officer's time and along with Brown County Mental Health Treatment Center costs of approximately \$500 per day, the total cost is approximately \$92,500. This is the cost the Green Bay area pays to keep people on alcohol holds. This is the same amount of significant funds spent in other years. The only other place these people have to go is St. John's Shelter. Captain Runge is also very supportive of these efforts.

Jane Shatswell discussed the need to use funding for people who are homeless for a place to go during daytime hours. She sees this need in many ways. When working for a gender-specific daytime drop-in site, many of the women who came in were from the shelters and made comments that many of the men wish they had an opportunity like this. Many of the homeless men hang out in the downtown areas during the day and as a patron of the downtown library, she realized the people on the streets were also the people who patronize the library. She sees the frustration of service providers from the BCHHC and the challenges associated with not being able to reach clients during the daytime. There is a way to combat the homeless problem in the community. In the Dept. of Commerce Annual Report of 2010, Brown County has the 3rd largest number of homeless individuals. This report brings to life the magnitude of the problem. The National Coalition for Homelessness has a fact sheet about mental illness which reports better mental health services can combat mental health issues and homelessness. In a survey by the United States Conference of Mayors from 2008, 20% of the cities listed better coordination of mental health services as one of the top three items needed to combat mental illness. Contrary to popular belief, many homeless people with severe mental illness are willing to accept treatment and services and the outreach programs are more successful when the workers establish a trusting relationship through continual contact with the people they are trying to help. A place where the homeless people could go to have consistent contact to build the relationships and coordinate with service providers needed to grow into self-sufficiency. Substance abuse can be a cause of homelessness, but homelessness can also cause substance abuse issues to cope with the situation. Breaking addiction can be tough for anybody, especially those who are homeless. For many homeless people, survival is more important than personal growth and development. Food and shelter becomes a higher priority than drug counseling. Many homeless people become estranged from their family and friends and without that social support network, recovery from substance abuse becomes very difficult. You need a place to develop those social connections to be able to grow. NWTC and NCTC are partners on AODA certification. They share how important environment is for substance abuse and being able to make the change. Based on the personal insights, she has become much more aware and encourages the use of this funding to go towards a place for homeless people to be during daytime hours. Jane explained that the BCHHC is very supportive of this concept.

Alexia Wood, the Executive Director at St. John's Homeless Shelter, explained that they are one small piece of a complex puzzle. In 2011, St. John's served 304 individuals with an average of 55 guests per night. Hours are from 5:00 p.m. – 9:00 a.m. 15.8% of the individuals were employed, though many were underemployed. Another 65.5% reported to be actively job seeking. The population is one that is looking to become self-sufficient, but may have fallen on some hard times. About 9% were veterans, 63% were diagnosed with a mental health disorder that was not drug or alcohol related (some of those may have had co-occurring disorders), 41% were diagnosed with a physical or medical disability, 15% with a cognitive disability, and 6% with

a hearing or vision disability. This is a very vulnerable population that we are asking to be on the streets from 9:00 a.m. to 5:00 p.m. We look at connecting them to services while they are at the shelter, but when they go on the streets in the summer months they lose some of the stability they had in their life. Alexia explained that a lot of money is spent getting the homeless reconnected with services that they were disengaged from during the summer. A summer site that could serve this population would offer the consistency so they aren't spending time and money getting them reconnected. Last year, they had 65 individuals who saw mental health professionals, 46 individuals reached out to Brown County AODO outreach workers, 21 DVR referrals, and 140 medical referrals. There is a lot going on between the hours of 5:00 p.m. and 9:00 a.m. and that is not when a lot of the other services are operating. Sunday nights are the hardest night at the shelter because there is no place to go. If they could create an environment targeted at serving this group during the daytime hours they would see alcohol holds take a drastic decrease, see fewer problems at St. John's, and see fewer complaints with the neighborhood. Something needs to be done to help the City as a whole and by directly impacting these vulnerable adults they would see this domino effect.

Noel Halvorsen started by acknowledging that they do have some challenges with the homeless population and as someone on the periphery of that, thinks that it is time to re-examine the approach to that challenge. It is particularly important to address the cohort that has mental health and AODA issues and that are particularly hard to house. The housing first model for homelessness may work by providing these people a place to live where mail and service providers can reach them. These people might still have a heap of problems, but at least when they wake up they don't have to worry about finding a place to sleep that night and can start addressing the rest of the trials and tribulations of their life. This is not a model that has found favor or a home in our community, but maybe there is an appropriate use of some of the City funds to study the issue and find a way to implement the model in our community.

Noel continued by addressing foreclosures in the community. There is still a lot of challenge with foreclosures in our community. They had 1,431 distressed (filing for foreclosure, auction, or bank-owned) properties as of the end of June. That was only 2 fewer than last year. This does not signal an end to the foreclosure crisis. There is still over 1,000 properties in that process today. More than 700 families are facing losing their homes to foreclosure. Even though the housing counselors at NeighborWorks are reaching over half of those people to find a path to keep their home and mitigate the issue related to foreclosure. The back end of the foreclosure process leaves us to deal with the banks getting these properties and then sitting on the market or deteriorating. They have hundreds of single and multifamily units that are currently vacant. Many do not have heat and it causes paint to freeze off the wall, water accumulates in the basement, and mold and mildew to grow in the basement and other issues. Unfortunately, there is a new crop of investors, not all of whom have the best interest in the community at their heart, trying to operate as new investment properties. Many properties are going unspoken for and are facing increasing deterioration. Whether the City is going to mobilize resources to continue tearing these down is anyone's guess. He questioned how we can get these homes economically reoccupied as quickly as possible to minimize some of this deterioration. He is seeing an uptick in the number of properties going to sheriff's sale. This might be a good thing because banks might be feeling better about their balance sheets, so they are finally taking the losses by getting rid of some of these lingering foreclosures. This brings additional homes to market in a time when we don't have lots of capacity to tackle the properties. Case in point is the property on E. Walnut Street that NeighborWorks recently looked at with the City. He had a conversation with HUD District 5 Director Antonio Riley about getting some of the single-family REOs in the hands of responsible investors and getting them occupied by renters. There is a rental housing crunch right now. Getting folks living in the house should take precedence over what the structure is of the ownership so that the house will have heat, electricity, and people living in it taking care of mold or other issues. With the vacancies and the REOs, a strategy should be developed as a community to get those houses occupied. Let's get them occupied with homeowners, if possible, and if not let's occupy them with tenants and work with them on lease purchase programs or something like that. They have lost a number of these houses. A

number of vacant lots exist around the community and they are going to have more. Not all of the foreclosures are worth saving. He questioned how we can leverage some of the resources coming into the community to address some of these vacant parcels. New energy-efficient, modest-sized homes could be a good program. The City has been working with some folks in the community to explore a green infill model. Homebuyer education and counseling remains a need and it may be more important than ever as credit becomes harder to get. It used to be if you make your payments you will be good because value will grow up over time. That is no longer a guarantee. Consistent factors of some of the healthier and more vibrant neighborhoods are areas that have the presence of neighborhood associations. The City's support for neighborhood associations has gone a long way to making the City as healthy as it is right now and seeing some of the challenges they are facing, the need to support that is greater than ever. Lastly, the City needs more art.

Meeting adjourned at 5:45 p.m.

A notice was published in the City newspaper, the Green Bay Press Gazette, providing a 30-day comment period on the allocations and proposed plan. Copies were made available on the City of Green Bay's website, the main branch of the central public library, and at the Planning office located within City Hall. Special accommodations, such as translators or translated versions of the plan, are made available upon request. No comments were received.

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

PY 2013 Action Plan Managing the Process response:

A notice was published in the City newspaper, the Green Bay Press Gazette, providing a 30-day comment period on the allocations and proposed plan. Copies were made available on the City of Green Bay's website, the main branch of the central public library, and at the Planning office located within City Hall. Special accommodations, such as translators or translated versions of the plan, are made available upon request.

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

PY 2013 Action Plan Managing the Process response:

No comments or views were received.

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

PY 2013 Action Plan Managing the Process response:

No comments or views were received.

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

Institutional Structure

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

PY 2013 Action Plan Institutional Structure response:

The City of Green Bay has a well-developed and successful institutional structure in place for the administration of federal funding.

Public Groups:

The City of Green Bay is the grantee for many of the affordable housing and community development programs that are provided by HUD. It provides the primary governmental support needed to implement programs under these grants.

The Redevelopment Authority of the City of Green Bay (RDA) administers the CDBG, HOME, and NSP 1 Programs for the City. Community Services Agency staff is responsible for the everyday administration of HUD-funded programming, including financial management. The Neighborhood Division is primarily responsible for the real estate work done in the Impact Areas, administration of the Community Service Intern Program, and the administration of the Owner-occupied Rehabilitation Loan Program.

The Department of Public Works administers public infrastructure programs such as sidewalk and alley replacement, and streetscaping in the LMI areas for the City. The Department of Parks, Recreation & Forestry administers park and parkway facilities and programming within the City. The Economic Development Authority administers the City's Economic Development Revolving Loan Fund within LMI areas.

The Green Bay Housing Authority manages 50 scattered site family rental units available for LMI households. The units are quality, single-family houses or duplexes that range in size from two to four-bedrooms to accommodate larger families. There are 15 four-bedroom units, 30 three-bedroom units, and 5 two-bedroom units. The Green Bay Housing Authority also manages Mason Manor, a 153-unit complex for the low and moderate-income elderly.

The Brown County Housing Authority manages the Housing Choice Voucher (HCV) program, which is designed to help individuals and families living on a limited income afford a private housing unit. Formerly known as the Section 8

Rental Assistance program, HCV now serves approximately 3,200 households in Brown County.

Non-profit Organizations:

Listed below are non-profit agencies that the City may work with during the 2013 Program year for various community development and housing related programs:

The Metropolitan Milwaukee Fair Housing Council (MMFHC) has administered the City's fair housing program for several years. This organization focuses on outreach and education.

Habitat for Humanity has received CDBG and HOME funding in the past to create LMI affordable housing.

Integrated Community Solutions works with the Brown County Housing Authority to administer and monitor the Housing Choice Voucher Program throughout Brown County.

Green Bay Neighborhood Leadership Council has raised thousands of private dollars for blight elimination and other neighborhood initiatives.

NeighborWorks® Green Bay, formerly Neighborhood Housing Services of Green Bay, is a designated CHDO for the City of Green Bay. It currently receives HOME funding for the administration of the Downpayment/Closing Cost Assistance Program. NeighborWorks® Green Bay often works with the City and the County to create LMI affordable housing in deteriorated areas.

Private Industry:

Listed below are some of the private businesses that the City has worked with in the past to provide assistance to LMI households.

Wisconsin Public Service has provided energy assistance to LMI property owners ranging from furnaces to energy audits to low-interest loans.

Financial Institutions that have partnered with the City to provide affordable housing in the past:

- Associated Bank
- Bank Mutual
- U.S. Bank
- Wells Fargo
- M&I Bank

Monitoring

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

PY 2013 Action Plan Monitoring response:

Neighborhood Division staff will provide general management, oversight, and coordination of all CDBG and HOME funded projects, including analysis of actual performance to anticipated performance. Staff will also conduct compliance and financial monitoring of Subrecipients, Developers, and CHDOs on-site. Forms have been designed to conduct these monitoring visits outlining compliance issues to be verified by staff. All forms contain Performance Measurement language in order to comply with HUD requirements. During a monitoring, all activities are reviewed to ensure beneficiary data is up-to-date and accurate.

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

PY 2013 Action Plan Monitoring response:

All subrecipients will be provided with an analysis of their current CDBG and HOME grant status at the end of each quarter throughout the 2013 Program Year. This will ensure that the City of Green Bay records match those of the subrecipient's, thus avoiding any major lack of spend down.

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

PY 2013 Action Plan Monitoring response:

The City of Green Bay's Homeowner Rehabilitation Loan Program, First Time Homebuyer Program, and all programs funded by HUD, must meet or exceed local code, or HUD's Housing Quality Standards. Inspections are carried out, both, during the project and a final inspection is conducted at the end of the project. Inspections are signed off by staff.

Procedures for the Homeowner Rehabilitation Loan Program also require that the Loan Note states as a condition of the loan that the homeowner must keep the home code compliant.

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

PY 2013 Action Plan Monitoring response:

During the 2013 Program Year, on-site monitoring will occur for all subreceptents of both CDBG and HOME funds. The Community Development Specialist along with the Neighborhood Development Specialist will utilize these on-site visits to ensure that each subreceptent is:

- Carrying out its funding activities as described
- Carrying out its activities in a timely manner
- Conducting its activities with adequate control over financial performance
- Complying with applicable laws and regulations relevant to their funded activity
- Maintaining the required records to demonstrate compliance with regulations and record keeping requirements

Description of Activities

****If not using the CPMP Tool: Complete and submit Table 3C***

****If using the CPMP Tool: Complete and submit the Projects Worksheets and the Summaries Table.***

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

PY 2013 Action Plan Description of Activities response: (Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)

- **Parks Projects:** While the Neighborhood staff will work closely with Park Department staff on funding decisions, Parks staff has identified the follow needs within the CDBG eligible areas. The Green Bay Parks Committee has officially supported the need to pave an acquired railroad corridor in an LMI neighborhood on the City's west side, (\$100,000). This important walk connection will link the west side LMI neighborhood residents to several schools and shopping corridors at either end of the walk. They also have supported the need to install ADA accessible main walks within the neighborhood park located in the Navarino Impact area, (\$75,000).
- **DPW Projects:** The Department of Public Works (DPW) will work in designated impact areas to resurface alleys, which are reaching an age where resurfacing is necessary, eliminate trip hazards on sidewalks caused by tree roots, and make improvements to ensure sidewalks are ADA accessible, (\$60,000.00). Additionally, eligible projects such as streetscape improvements designed to improve the overall

quality of living in the LMI impact neighborhoods will be examined and implemented, (\$90,000.00).

- **Community Service Interns:** Funding in the amount of \$108,000 will be utilized to continue the Community Service Intern (CSI) program. While interns work within all CDBG eligible areas, their focus will be directed to the impact areas. This program has been a very successful component of decreasing crime in the City's core neighborhoods. Interns assist the Police Department by attending neighborhood events, picking up found bicycles and logging them into police evidence, conducting vacation checks for residents gone for extended periods of time, providing translation services, making referrals to inspection, and creating a police presence in downtown neighborhoods.
- **Neighborhood Compliance Inspector:** Minor inspection violations such as junk, trash, pet waste, grass and weed control, and vehicles in the front yard are becoming a major problem in our Impact Areas. In 2013, the City of Green Bay will fund a full-time inspection position that is responsible for performing inspections and conducting problem resolution in these areas. The position will be funded with \$30,000 of CDBG funds and \$30,000 City contribution.
- **Fair Housing Services:** As both a HUD mandate and an important component to affirmatively furthering fair housing choice, an allocation of \$10,000 will be utilized to ensure fair housing practices. Proposed activities under this project include educational services through presentations and direct assistance, managing fair housing complaints, and distribution of information of fair housing laws and illegal discrimination.
- **Other Public Service Activities:** This program is designed to make grants available to local nonprofit agencies through a competitive review of proposals received related to the goals and needs the community as defined in the plan. All awards will benefit LMI families or neighborhoods.
- **Impact Areas:** Most of the activities in the Impact Areas will focus on the continuation of residential real estate activities such as demolition or rehabilitation of housing acquired in previous program years, new construction of affordable housing, homeowner rehabilitation, and homebuyer assistance. Additionally, eligible projects such as streetscape improvements designed to improve the overall quality of living in the LMI impact neighborhoods will be examined and implemented. Approximately \$132,000 in CDBG funding and Program Income will be utilized specifically within the impact areas.
- **Economic Development Revolving Loan Fund:** The program is a low-interest rate loan program which serves as gap financing, as long as business owners commit to creating full-time equivalent positions for low-to-moderate income individuals. The 2013 funds will continue to capitalize the fund, which successfully serves both

startups and expansions citywide. This program is estimated to receive approximately \$200,000 in program income during the 2013 program year.

- Economic Development – LMI Benefit:** This program will provide grants for Economic Development projects in Impact Areas and LMI neighborhoods that may include acquisition, construction, reconstruction or rehabilitation assistance to private for-profit business. Applications for this program will be handled through the Economic Development Department of the City of Green Bay and managed in accordance with all federal regulations.
- Single Family Rehab Loan Program:** This program is designed to improve the housing stock in LMI area neighborhoods. Low-to-moderate income households apply for deferred interest loans that range from \$1,000 to \$24,999. The rehab loans help low-income homeowners pay for necessary maintenance for their properties, thus increasing the attractiveness and value of the entire neighborhood. The 2013 estimated HOME program income of \$20,000 will be used to fund this program.
- Housing Development Advancement Projects:** The City has allocated \$200,000 in HOME funds and approximately \$80,000 of 2013 HOME Program Income to project(s) that will create additional opportunities for quality affordable housing units. Housing Development Advancement Projects will be primarily used as a development subsidy for new affordable housing units.
- Community Development Housing Organization:** The City has allocated \$7131,500 in HOME money to project(s) that will be carried out by a local Community Housing Development Organizations (CHDO’s). These projects will involve the construction or rehabilitation of homes for permanent, single-family housing or rental housing to LMI families. Staff will work with the CHDO staff in order to identify projects within the impact areas and follow the existing CHDO application process.

2013 Draft Community Development Block Grant Allocations

Projects	Allocations	Program Income	TOTAL
Park Projects			
West Side Walk Paving	\$100,000.00	\$0.00	\$100,000.00
Navarino Park Install Main Walks	\$50,000.00	\$0.00	\$50,000.00
DPW Projects			\$0.00
Sidewalk/Alley Resurfacing	\$60,000.00	\$0.00	\$60,000.00
Streetscaping (City Neighborhoods)	\$90,000.00	\$0.00	\$90,000.00

Public Service Programs (cannot exceed \$168,000.00)			
Community Service Interns	\$108,000.00	\$0.00	\$108,000.00
Neighborhood Compliance Inspector	\$30,000.00	\$0.00	\$30,000.00
Fair Housing Services	\$10,000.00	\$0.00	\$10,000.00
Other Public Service Activities	\$20,000.00	\$0.00	\$20,000.00
Subtotal for Public Service	\$168,000.00	\$0.00	\$168,000.00
Impact Area Projects	\$112,000.00	\$20,000.00	\$132,000.00
Economic Development Projects			
Economic Development Revolving Loan	\$0.00	\$200,000.00	\$200,000.00
Economic Development-LMI Benefit	\$100,000.00	\$0.00	\$100,000.00
* CDBG Administration (cannot exceed \$224,000.00)	\$220,000.00	\$0.00	\$220,000.00
TOTALS	\$900,000.00	\$220,000.00	\$1,120,000.00

2013 Estimated CDBG Allocation - \$900,000.00
 2013 Estimated Program Income \$220,000.00 (\$200,000 is restricted to Economic Revolving Loan fund)
 Public Services-limited to a max of 15% total Entitlement + prior years PI, in 2013 it cannot exceed \$168,000

* CDBG Administration amount is limited to a maximum of 20% total Entitlement plus Program Income
 TOTAL \$1,120,000.00

2013 Draft HOME Allocations

Projects	Allocations	Program Income	TOTAL
Single Family Rehabilitation Loans	\$0.00	\$20,000.00	\$20,000.00
Downpayment Closing Cost Assistance	\$50,000.00	\$0.00	\$50,000.00
Housing Development Advancement Projects	\$200,000.00	\$80,000.00	\$280,000.00
Community Housing Development Organizations (CHDO) Set Aside	\$131,500.00	\$0.00	\$131,500.00
+HOME Administration (cannot exceed \$53,500.00)	\$53,500.00	\$0.00	\$53,500.00
TOTALS	\$435,000.00	\$100,000.00	\$535,000.00

2013 Estimated HOME Allocation \$435,000.00

2013 Estimated Program Income \$100,000

* HOME Administration amount is limited to a maximum of 10% total Entitlement plus Program Income
CHDO set-aside must be a minimum of 15% (\$65,250.00) of total Entitlement amount; Eligible activities include:

- Acquisition and/or rehabilitation of housing
- New construction of housing

TOTAL \$535,000.00

Summary of Specific Annual Objectives and Outcome Measures

**If not using the CPMP Tool: Complete and submit Table 2C and Table 3A.*

**If using the CPMP Tool: Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls*

23. Provide a summary of specific objectives that will be addressed during the program year. (91.220(c)(3))

**PY 2013 Action Plan Summary of Specific Annual Objectives response:
(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)**

Each of Green Bay’s 2013 CDBG Activities fall under one of the following objectives:

- Create Suitable Living Environments
- Provide Decent Affordable Housing
- Create Economic Opportunities

24. Describe the Federal Resources, and private and non-Federal public resources expected to be available to address priority needs and specific objectives during the program year.

**PY 2013 Action Plan Summary of Specific Annual Objectives response:
(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)**

In addition to the anticipated CDBG and HOME entitlement allocation the City receives from HUD in order to address the needs expressed in this plan, the following resources may also be used.

Federal:	HOME; CDBG; Section 8 HCV Program; NSPI
State:	Weatherization Program; WHEDA Loan Program
Local:	Neighborhood Enhancement Funds
Private:	Matching bank loan funds for rehabilitation activities

25. Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability). 91.220(e)

PY 2013 Action Plan Summary of Objectives/Outcomes response: (Use of the Summaries Table or Table 2C/Table 3A will be sufficient. No additional narrative is required.)

Each of Green Bay’s 2013 CDBG Activities fall under one of the following combinations of objectives and outcomes:

Park Projects	Create Suitable Living Environments/Availability/Accessibility Environments/Sustainability
DPW Projects	Create Suitable Living Environments/Sustainability Environments/Availability/Accessibility
Community Service Interns	Create Suitable Living Environments/Sustainability
Neighborhood Compliance Inspector	Create Suitable Living Environments/Sustainability
Fair Housing	Provide Decent Affordable Create Suitable Living Housing/Availability/Accessibility
Other Public Service Activities	Create Suitable Living Environments/Sustainability Environments/Availability/Accessibility
Impact Areas	Provide Decent Affordable Create Suitable Living Housing/Affordability Environments/Availability/Accessibility
Economic Development	Create Economic Opportunities/Sustainability

HOUSING

Annual Affordable Housing Goals (91.220(g))

**If not using the CPMP Tool: Complete and submit Table 3B Annual Housing Completion Goals.*

**If using the CPMP Tool: Complete and submit the Table 3B Annual Housing Completion Goals.*

26. Describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.

PY 2013 Action Plan Annual Affordable Housing Goals response:

TABLE 3B ANNUAL HOUSING COMPLETION GOALS					
ANNUAL AFFORDABLE RENTAL HOUSING GOALS (SEC. 215)	Annual Expected Number Completed	Resources used during the period			
		CDBG	HOME	ESG	HOPWA
Acquisition of existing units	2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Production of new units	1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation of existing units	2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Rental Goals	5	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC. 215)					
Acquisition of existing units	4	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Production of new units	3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation of existing units	20	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homebuyer Assistance	20	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Owner Goals	47	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)					
Homeless		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-Homeless		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special Needs		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Total Sec. 215 Affordable Housing			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL HOUSING GOALS					
Annual Rental Housing Goal	5	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	47	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Annual Housing Goal	52	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Needs of Public Housing (92.220(b))

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

PY 2013 Action Plan Needs of Public Housing response:

The Green Bay Housing Authority (GBHA), along with the Brown County Housing Authority (BCHA), manages all public housing within the City of Green Bay. GBHA manages 50 scattered site family rental units that are available to LMI households. The units are quality, single-family houses or duplexes that range in size from two to four- bedroom units to accommodate larger families. There are 15 four-bedroom units, 30 three-bedroom units, and 5 two-bedroom units. GBHA also manages Mason Manor, a 153-unit complex for LMI elderly and disabled persons. The BCHA manages the Housing Choice Voucher (HCV) Program, which is designed to help individuals and families living on a limited income afford a private housing unit. Formerly known as Section 8 Rental Assistance Program, HCV now serves approximately 3,200 households in Brown County. A majority of these vouchers are used in the near downtown area.

Though public housing is a very important need in our community, staff continues to promote homeownership for LMI residents. CDBG and HOME funding will be used to provide programming that helps low and very-low income households become more involved in management and homeownership. Carryover funds from 2011 programs will provide down payment and closing cost assistance to LMI potential homebuyers. 2013 CDBG and HOME entitlement funds will provide funding for activities in the Impact Areas that will focus on the continuation of residential real estate activities such as demolition or rehabilitation of housing acquired in previous program years, new construction of affordable housing, homeowner rehabilitation, and homebuyer assistance. Additionally, eligible projects such as streetscape improvements designed to improve the overall quality of living in the LMI impact neighborhoods will be examined and implemented as well. BCHA will also continue its HCV Homeownership Program, which helps persons in the HCV Rental Program purchase a home.

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

PY 2013 Action Plan Needs of Public Housing response:

No public housing has been designated as “troubled” by HUD or is otherwise performing poorly.

Antipoverty Strategy

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

PY 2013 Action Plan Antipoverty Strategy response:

The City will continue supporting a number of programs during the 2013 program year with the goal of reducing poverty among area families.

- Rental assistance through the HCV program reduces the housing cost burden to very low-income clients. Clients are able to choose where they live, allowing them to find locations near employment opportunities, transportation, and support services.
- Very low-income households can qualify for rental assistance through the HCV Program. Once in this program, these persons are eligible to participate in the Family Self Sufficiency Program (FSS Program). The FSS Program is a cooperative program that provides support and assistance to LMI families for up to five years. HCV program households that participate in the FSS program set an action plan that identifies the family’s employment goals. The plan outlines the activities and services required to achieve these goals. FSS Coordinators assist the families in staying on track with their goals and monitoring their progress. FSS families earn escrow accounts as their earned income increases.

City staff will also continue to coordinate with other agencies and programs in order to provide high-quality services to LMI families. Wisconsin Public Service, Integrated Community Solutions, NeighborWorks® Green Bay, and Greater Green Bay Habitat for Humanity have all been partners in creating affordable housing opportunities to families in poverty.

Job creation efforts for LMI persons will continue through the Economic Development Revolving Loan Fund, (ED RLF). Economic Development staff are marketing the ED RLF heavily in the Impact Areas in order to create neighborhood based businesses and jobs for the area residents.

Barriers to Affordable Housing

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

PY 2013 Action Plan Barriers to Affordable Housing response:

Lack of quality affordable housing units in the market place is a serious barrier to affordable housing. To address this barrier, the City of Green Bay will improve the physical housing conditions, increase the number of affordable units, and alleviate developer's risks on affordable housing developments. This can be accomplished through the Homeowner Rehabilitation Program, Impact Areas – acquisition/rehab, Homebuyer Assistance, Homebuyer Counseling, CHDOs and Housing Development Advancement Projects. With housing costs comprising of roughly 30% of household income, it becomes the largest and most important expenditure, which is why the city intends to continue creating additional quality affordable housing units, educating buyers and providing financial assistance, thereby removing this barrier.

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

PY 2013 Action Plan Barriers to Affordable Housing response:

Increasing and maintaining affordable housing for LMI persons is a top priority for the City of Green Bay. Poverty can have a crippling effect on individuals and neighborhoods. The City will focus on creating affordable, quality housing for low-income individuals in its Impact Area neighborhoods. 2013 Entitlement funds spent in the impact neighborhoods will support residential real estate activities such as demolition or rehabilitation of housing acquired in previous program years, new construction of affordable housing, homeowner rehabilitation, and homebuyer assistance. Additionally, eligible projects such as streetscape improvements designed to improve the overall quality of living in the LMI impact neighborhoods will be examined and implemented. Carry over 2011 funds allocated to NeighborWorks® Green Bay will provide deferred downpayment and/or closing cost assistance loans to LMI households. This program reduces the amount of cash needed up front for the purchase of a home, making homeownership a reality for many LMI families.

Larger maintenance issues, which can be challenging for LMI homeowners, may be funded through the HOME Single Family Rehabilitation Loan program. This

loan program funds rehabilitation projects on owner-occupied, single family homes through deferred payment, zero interest loans.

The City has also allocated \$200,000 in HOME funds and approximately \$80,000 of 2013 HOME Program Income to project(s) that will create additional opportunities for quality affordable housing units. Housing Development Advancement Projects will be primarily used as a development subsidy for new affordable housing units.

Lead-based Paint

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

PY 2013 Action Plan Lead-based Paint response:

The City of Green Bay has adopted the position that presumes there is lead present in all pre-1978 housing. Therefore, lead-safe work practices are utilized in all rehabilitation projects. Projects that work with potential lead hazards are identified and receive standard treatments. All projects must pass a lead clearance test. Staff also distributes the pamphlet “Renovate Right” to all households participating in a rehabilitation project. The City of Green Bay has two staffed lead hazard investigators. Staff is also working with other communities in Brown County to start a regional Lead Coalition to better address the lead issues in our community. Some of the goals identified for this coalition are to develop a local plan including issues such as increasing public education, testing of high-risk children, and funding for lead abatement.

HOMELESS

Specific Homeless Prevention Elements

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

33. Please describe, briefly, the jurisdiction’s plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness. Again, please identify barriers to achieving this.

PY 2013 Action Plan Specific Homeless Prevention response:

Federal funds applied for under the HOME and CDBG programs are available to address homeless needs and to prevent homelessness. However, the City has chosen not to use these funds directly to fund shelters or transitional housing. It will instead fund homeless activities that focus on essential service activities; such as drop-in centers/day shelters, and street outreach to inform homeless persons about the availability of shelter, housing search assistance, medical and psychological counseling, job training and placement, substance abuse treatment and counseling, nutrition assistance, childcare, transportation, and assistance in obtaining other federal, state, and local benefits and services. In addition, the federal allocations will be used to help prevent homelessness through the promotion of homeownership and affordable low-income housing. HOME funds are used to fund the Single-family Rehabilitation Loan Program that provides no-interest, deferred loans to LMI households to repair code violations on their homes. For some families, this could mean the difference between imminent homelessness and keeping their home. The City also supports the Brown County Homeless and Housing Coalition, which applies for HUD funding to directly support homeless activities. Brown County Human Services employs two staff persons for outreach to individuals and families threatened by homelessness. They provide assistance and referral services to persons in order to help them avoid homelessness.

A major barrier to providing more funding and support to homelessness is the lack of federal funding to provide such services. Dramatic cuts in funding levels have made it difficult for the City to provide funding to public services. As stated in the Analysis of Impediments, another unfortunate obstacle is resistance by local residents to having transitional and emergency housing within their neighborhoods. Staff and homeless providers have discussed this and approaches to helping change local attitudes. Some of the most promising solutions are through education and the offering of new housing options that may be more appealing to residents, such as scattered site housing.

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

PY 2013 Action Plan Specific Homeless Prevention response:

The Leaving Homelessness Behind program, which will be initially administered through ICS and funded initially through our local housing authorities, provides hotel vouchers to homeless families with children to assist with immediate housing needs. The program also adds these families to the HCV program or other housing assistance programs through an expedited process.

Also, the Brown County and Green Bay Housing Authorities are working on developing a housing assistance preference for homeless families with children to speed up housing program processing times and get families back into quality, stable and affordable housing.

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

PY 2013 Action Plan Specific Homeless Prevention response:

The need for a cohesive, community-wide Discharge Coordination Policy is a very important step in the plan to prevent homelessness among individuals in the corrections system or some other type of facility. Brown County Human Services, the Brown County Jail and the Crisis Center all work together to address housing issues for these individuals. Specifically, Brown County Human Services runs the Outreach Program to ensure that recently released inmates discharged from the Wisconsin Prison and Corrections System do not become homeless due to a lack of social, psychiatric, and economic support. Further, Brown County and City staff will continue to remain actively involved in the local Continuum of Care program, which works with the Brown County Mental Health Center and its patients upon discharge. Clients willing to participate in this program receive a number of supportive services that help lead to a more smooth and successful re-entry into society.

Emergency Shelter Grants (ESG)

36. If applicable, describe how the ESG matching requirements will be met.

PY 2013 Action Plan ESG response:

The City of Green Bay does not receive any Emergency Shelter Grant funds as an entitlement community.

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

PY 2013 Action Plan ESG response:

N/A

NON-HOMELESS SPECIAL NEEDS HOUSING

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

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

**If using the CPMP Tool: Complete and submit Needs Table/Non-Homeless Needs.*

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

PY 2013 Action Plan Non-homeless Special Needs response:

All of the City's housing activities are available to persons and households with special needs. Affordable housing rehabilitation, rental assistance, down payment and closing assistance, and other programs are tailored to meet the needs of large families, the elderly, and persons with disabilities. New constructions of units featuring universal design are given priority when choosing projects that will serve the needs of the elderly and disabled. For 2013, our objectives include providing single-family rehabilitation loans, CHDO rehab projects, and providing homebuyer assistance loans to support housing activities for persons who are not homeless.

COMMUNITY DEVELOPMENT

Community Development Block Grant

**If not using the CPMP Tool: Complete and submit Table 2B, Table 1C Summary of Specific Objectives.*

**If using the CPMP Tool: Complete and submit the Needs Worksheets/Non-Housing Community Development and Summary of Specific Annual Objectives Worksheets or Summaries.xls*

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

PY 2013 Action Plan Community Development response:

<p>Parks Projects: Parks staff has identified the follow needs within the CDBG eligible areas. The Green Bay Parks Committee has officially supported the need to pave an acquired railroad corridor in an LMI neighborhood on the City’s west side, (\$100,000). This important walk connection will link the west side LMI neighborhood residents to several schools and shopping corridors at either end of the walk. They also have supported the need to install ADA accessible main walks within the neighborhood park located in the Navarino Impact Area, (\$75,000).</p>		<p>\$150,000</p>
<p>DPW Projects: The Department of Public Works (DPW) will work in designated impact areas to resurface alleys, which are reaching an age where resurfacing is necessary, eliminate trip hazards on sidewalks caused by tree roots, and make improvements to ensure sidewalks are ADA accessible, (\$60,000.00). Additionally, eligible projects such as streetscape improvements designed to improve the overall quality of living in the LMI impact neighborhoods will be examined and implemented, (\$90,000.00).</p>		<p>\$150,000</p>
<p>Community Service Interns: Funding in the amount of \$108,000 will be utilized to continue the Community Service Intern (CSI) program. While interns will work within all CDBG eligible areas, their focus will be directed to the impact areas. This program has been a very successful component of decreasing crime in the City’s core neighborhoods. Interns assist the Police Department by attending neighborhood events, picking up found bicycles and logging them into police evidence, conducting vacation checks for residents gone for extended periods of time, providing translation services, making referrals to inspection, and creating a police presence in downtown neighborhoods.</p>		<p>\$108,000</p>
<p>Neighborhood Compliance Inspector: Minor inspection violations such as junk, trash, pet waste, grass and weed control, and vehicles in the front yard are becoming a major problem in our Impact Areas. In 2013, the City of Green Bay will fund a full-time inspection position that is responsible for performing inspections and conducting problem resolution in these areas. The position will be funded with \$30,000 of CDBG funds and \$30,000 City</p>		<p>\$30,000</p>

contribution.		
Fair Housing Services: As both a HUD mandate and an important component to affirmatively furthering fair housing choice, an allocation of \$10,000 will be utilized to ensure fair housing practices. Proposed activities under this project include educational services through presentations and direct assistance, managing fair housing complaints, and distribution of information of fair housing laws and illegal discrimination.		\$10,000
Other Public Service Activities: This program is designed to make grants available to local nonprofit agencies through a competitive review of proposals received related to the goals and needs the community as defined in the plan. All awards will benefit LMI families or neighborhoods.		\$20,000
Impact Areas: Most of the activities in the impact areas will focus on the continuation of residential real estate activities such as demolition or rehabilitation of housing acquired in previous program years, new construction of affordable housing, homeowner rehabilitation, and homebuyer assistance. Additionally, eligible projects such as streetscape improvements designed to improve the overall quality of living in the LMI impact neighborhoods will be examined and implemented. Approximately \$158,000 in CDBG funding will be utilized specifically within the impact areas.		\$158,000
Economic Revolving Loans: The program is a low-interest rate loan program which serves as gap financing, as long as business owners commit to creating full-time equivalent positions for low-to-moderate income individuals. The 2013 funds will continue to capitalize the fund, which successfully serves both startups and expansions citywide. This program is estimated to receive approximately \$200,000 in program income during the 2013 program year.		PI \$200,000
Economic Development – LMI Benefit: This program will provide grants for Economic Development projects in Impact Areas and LMI neighborhoods that may include acquisition, construction, reconstruction or rehabilitation		\$100,000

assistance to private for-profit business. Applications for this program will be handled through the Economic Development Department of the City of Green Bay and managed in accordance with all federal regulations.		
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40. CDBG resources must include the following in addition to the annual grant:

a. Program income expected to be received during the program year, including:

The City is anticipating receiving \$220,000 in CDBG program income in the year 2013. Program income of \$20,000 will be budgeted to Impact Areas activities and \$200,000 will be from ED revolving loan activities and will go back into the Economic Revolving Loan fund.

i. The amount expected to be generated by and deposited to revolving loan funds;

PY 2013 Community Development response:

The City is expecting to receive approximately \$200,000 in Program Income that will be deposited into the Economic Development Revolving Loan fund. The program is a low- interest rate loan program which serves as gap financing, as long as business owners commit to creating full-time equivalent positions for low-to-moderate income individuals.

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

PY 2013 Community Development response:

The City of Green Bay does not have any active float-funded activities and therefore is not expecting to receive any program income in 2013 for this type of activity.

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

PY 2013 Community Development response:

The City of Green Bay does not have program income from a preceding year that has not been included in a statement or plan.

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

PY 2013 Community Development response:

The City of Green Bay has no proceeds from Section 108 loan guarantees.

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

PY 2013 Community Development response:

The City of Green Bay has no surplus funds from any urban renewal settlement.

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

PY 2013 Community Development response:

The City of Green Bay did not have to return any grant funds to the line of credit.

41. **NA** **If a jurisdiction intends to carry out a new CDBG float-funded activity, the jurisdiction's plan must include the following information:**

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

PY 2013 Community Development response:

The City of Green Bay is not intending to carry out any new CDBG float-funded activities in the 2013 year.

41. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs, public facilities, public improvements, public services and economic development. (Use of Table 2B or the Community Development Needs Table is sufficient, additional narrative is not required)

- a. **For activity for which the jurisdiction has not yet decided on a specific location, such as when a jurisdiction is allocating an amount of funds to be used for making loans or grants to businesses or for residential rehabilitation, provide a description of who may apply for the assistance, the process by which the grantee expects to select who will receive the assistance (including selection criteria), and how much and under what terms the assistance will be provided.**

PY 2013 Community Development response:

The City of Green Bay has allocated CDBG funding to the following activities that do not yet have a specific location:

Economic Development Revolving Loan Fund: The program is a low- interest rate loan program which serves as gap financing, as long as business owners commit to creating full-time equivalent positions for low-to-moderate income individuals. The 2013 funds will continue to capitalize the fund, which successfully serves both startups and expansions citywide. This program is estimated to receive approximately \$200,000 in program income during the 2013 program year.

42. 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.

(Use of Table 2B or the Community Development Needs Table and Summaries Table is sufficient, additional narrative is not required)

The City of Green Bay will continue to focus on the implemented Impact Areas (maps located on page 3 and 4) that reflect areas of primarily low- and moderate-income persons within the City of Green Bay. These impact areas contain some of the most deteriorated housing stock in the City, extremely high concentrations of LMI households, and above-average crime rates. The impact areas also have very low homeowner rates and higher than average rates of inspection violations.

These areas were also chosen due to economic development opportunities and their close proximity to schools and parks. By focusing on smaller areas, a stronger visual and social impact will occur in a shorter timeframe.

In 2013 the City, using Neighborhood Division staff, will coordinate its efforts with other City departments, community groups and neighborhood residents in order to accomplish these goals:

- **Increase quality, affordable housing**
- **Increase Economic Development Opportunities**
- **Crime Prevention**
- **Youth Development activities that support; education and job training**
- **Homelessness activities that focus on essential service activities; such as drop-in centers/day shelters, and street outreach to inform homeless persons about the availability of shelter, housing search assistance, medical and psychological counseling, job training and placement, substance abuse treatment and counseling, nutrition assistance, childcare, transportation, and assistance in obtaining other federal, state, and local benefits and services.**

2013 CDBG Activities that will accomplish these three goals are as follows:

- **Parks Projects:** While the Neighborhood staff will work closely with Park Department staff on funding decisions, Parks staff has identified the follow needs within the CDBG eligible areas. The Green Bay Parks Committee has officially supported the need to pave an acquired railroad corridor in an LMI neighborhood on the City's west side, (\$100,000). This important walk connection will link the west side LMI neighborhood residents to several schools and shopping corridors at either end of the walk. They also have supported the need to install ADA accessible main walks within the neighborhood park located in the Navarino Impact area, (\$75,000).
- **DPW Projects:** The Department of Public Works (DPW) will work in designated impact areas to resurface alleys, which are reaching an age where resurfacing is necessary, eliminate trip hazards on sidewalks caused by tree roots, and make improvements to ensure sidewalks are ADA accessible, (\$60,000.00). Additionally, eligible projects such as streetscape improvements designed to improve the overall quality of living in the LMI impact neighborhoods will be examined and implemented, (\$90,000.00).
- **Community Service Interns:** Funding in the amount of \$\$108,000 will be utilized to continue the Community Service Intern (CSI)

program. While interns work within all CDBG eligible areas, their focus will be directed to the impact areas. This program has been a very successful component of decreasing crime in the City's core neighborhoods. Interns assist the Police Department by attending neighborhood events, picking up found bicycles and logging them into police evidence, conducting vacation checks for residents gone for extended periods of time, providing translation services, making referrals to inspection, and creating a police presence in downtown neighborhoods.

- **Neighborhood Compliance Inspector:** Minor inspection violations such as junk, trash, pet waste, grass and weed control, and vehicles in the front yard are becoming a major problem in our Impact Areas. In 2013, the City of Green Bay will fund a full-time inspection position that is responsible for performing inspections and conducting problem resolution in these areas. The position will be funded with \$30,000 of CDBG funds and \$30,000 City contribution.
- **Fair Housing Services:** As both a HUD mandate and an important component to affirmatively furthering fair housing choice, an allocation of \$10,000 will be utilized to ensure fair housing practices. Proposed activities under this project include educational services through presentations and direct assistance, managing fair housing complaints, and distribution of information of fair housing laws and illegal discrimination.
- **All Other Public Service Activities:**
- **Impact Areas:** Most of the activities in the Impact Areas will focus on the continuation of residential real estate activities such as demolition or rehabilitation of housing acquired in previous program years, new construction of affordable housing, homeowner rehabilitation, and homebuyer assistance. Additionally, eligible projects such as streetscape improvements designed to improve the overall quality of living in the LMI impact neighborhoods will be examined and implemented. Approximately \$132,000 in CDBG funding and Program Income will be utilized specifically within the impact areas.
- **Economic Development Revolving Loan Fund:** The program is a low-interest rate loan program which serves as gap financing, as long as business owners commit to creating full-time equivalent positions for low-to-moderate income individuals. The 2013 funds will continue to capitalize the fund, which successfully serves both startups and expansions citywide. This program is estimated to receive

approximately \$200,000 in program income during the 2013 program year.

- **Economic Development – LMI Benefit:**
- **Single Family Rehab Loan Program:** This program is designed to improve the housing stock in LMI area neighborhoods. Low-to-moderate income households apply for deferred interest loans that range from \$1,000 to \$24,999. The rehab loans help low-income homeowners pay for necessary maintenance for their properties, thus increasing the attractiveness and value of the entire neighborhood. The 2013 estimated HOME program income of \$20,000 will be used to fund this program.
- **Housing Development Advancement Projects:** The City has allocated \$200,000 in HOME funds and approximately \$80,000 of 2013 HOME Program Income to project(s) that will create additional opportunities for quality affordable housing units. Housing Development Advancement Projects will be primarily used as a development subsidy for new affordable housing units.
- **Community Development Housing Organization:** The City has allocated \$7131,500 in HOME money to project(s) that will be carried out by a local Community Housing Development Organizations (CHDO's) . These projects will involve the construction or rehabilitation of homes for permanent, single-family housing or rental housing to LMI families. Staff will work with the CHDO staff in order to identify projects within the impact areas and follow the existing CHDO application process.

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

PY 2013 Community Development response:

The City of Green Bay is not including any “urgent need” activity in the 2013 action plan.

HOME/ American Dream Down payment Initiative (ADDI)

NA

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

PY 2013 Action Plan HOME/ADDI response:

The City of Green Bay’s 2013 Annual Action Plan has allocated HOME funds to the following activities:

<p>Single Family Rehab Loan Program: This program is designed to improve the housing stock in LMI area neighborhoods. Low-to-moderate income households apply for deferred interest loans that range from \$1,000 to \$24,999. The rehab loans help low-income homeowners pay for necessary maintenance for their properties, thus increasing the attractiveness and value of the entire neighborhood. 2012 estimated HOME program income of \$100,000 will be used to fund this program.</p>	<p>PI \$20,000</p>
<p>Downpayment Closing Cost Assistance: This program provides deferred interest loans to low-to-moderate income families for down payment and/or closing cost assistance. This program is critical to the goal of achieving increased homeownership in LMI areas. Also, because it reduces the amount of cash needed up front for the purchase of a home, it aids in making homeownership a reality for many LMI families. Special financing will be made to those who purchase homes within the impact areas.</p>	<p>\$50,000</p>
<p>Housing Development Advancement Projects: The City has allocated \$280,000 in HOME funds to project(s) that will create additional opportunities for quality affordable housing units. Housing Development Advancement Projects will be primarily used as a development subsidy for new affordable housing units.</p>	<p>\$200,000 PI \$ 80,000</p>
<p>Community Development Housing Organization: The City has allocated \$131,500 in HOME money to project(s) that will be carried out by a local CHDO. These projects will involve the construction or rehabilitation of homes for permanent, single-family housing for LMI families. Staff will work with the CHDO staff in order to identify projects within the impact areas.</p>	<p>\$131,500</p>
<p>Administration</p>	<p>\$53,500</p>

The City of Green Bay’s 2013 Annual Action Plan does not include any other forms of investment that are not described in 92.2059b).

45. Describe how HOME matching requirements will be satisfied?

PY 2013 Action Plan HOME/ADDI response:

The City of Green Bay will satisfy HOME matching requirements by the use of excess match from prior years and the contribution of site preparation, construction materials and donated labor from Habitat for Humanity.

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

PY 2013 Action Plan HOME/ADDI response:

As stated in the 2010-2014 Consolidated Plan, the City of Green Bay will use the recapture provision for HOME funds in program year 2013.

In the event of a voluntary or involuntary transfer of the property during the applicable period of affordability, the City will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided as down payment assistance in the form of a deferred payment 0% interest loan. The loan will remain deferred as long as the home remains the principal residence of the home buyer. If the home becomes not the homebuyers principal residence the loan is due in full. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the amount of the HOME subsidy, the City shall recapture the balance of the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. Net proceeds are defined as the sales price minus superior loan repayment and any closing costs incurred by the homebuyer.

This language shall be included and adopted in the City of Green Bay's HOME policies, and incorporated into written agreements and loan documents.

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

PY 2013 Action Plan HOME/ADDI response:

The City of Green Bay, developers, and owners of HOME funded affordable housing project are required to follow all HOME regulations, including affirmative marketing requirements for five or more HOME-assisted units. To affirmatively market HOME-assisted housing units, the City, developers, and owners will advertise available units in various outlets including, but not limited to, Green Bay Press Gazette, WI Front Door, and Multiple Listing Services, as appropriate. Additionally, the City, developers, and owners will use the Equal Housing Opportunity logo on promotional material and send notices of available units to the Brown County Housing Authority, Green Bay Housing Authority, Integrated Community Solutions and any other service agency or community group where interested individuals may gather. All HOME funded participants shall retain project specific affirmative marketing documentation and each may be monitored for affirmative marketing efforts. City staff will review effectiveness of affirmative marketing procedures annually based on the City, developer, and owner documentation and fair housing reports. Furthermore, the City will continue working with a fair housing organization, such as Metropolitan Milwaukee Fair Housing Council, to ensure potential tenants or home buyers are educated about fair housing issues.

48. Describe actions to be taken to establish and oversee a minority outreach program within the jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking, underwriters, accountants, and providers of legal services, in all contracts, entered into by the PJ with such persons or entities, public and private, in order to facilitate the activities of the PJ to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

PY 2013 Action Plan HOME/ADDI response:

It is the policy of the City of Green Bay Redevelopment Authority to require its contractors to provide equal employment opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin, disability, veteran's or marital status, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment.

The Redevelopment Authority implements this policy through the awarding of contracts to contractors, vendors, and suppliers, to create employment and business opportunities for the residents of the City of Green Bay and other qualified low- and very low-income persons residing.

It is the RDA's policy to achieve Section 3 goals through the following means:

HIRING

At least 30% of the aggregate number of full-time new hires are expected to be Section 3 residents, with a preference for residents at the development where the work is being performed.

CONTRACTS

Contractors may demonstrate Section 3 compliance by providing a notarized statement committing to award to Section 3 business concerns:

At least 10% of the total dollar amount of all Section 3 covered contracts for building trades work for maintenance, repair, modernization, or development of public housing, or for building trades work arising in connection with housing rehabilitation, housing construction, and other public construction.

The preference is to contract directly with a Section 3 business or contract with vendors that subcontract to a Section 3 business. In either case, the preference is further defined as prioritizing business concerns that employ GBHA or RDA residents from the property where the work is being performed.

Providing other economic opportunities to train and employ Section 3 residents or contributing to a Section 3 compliance fund which provides other economic opportunities.

The policy shall result in a reasonable level of success in recruitment, employment, and utilization of City residents and other eligible persons and business by City of Green Bay contractors working on contracts partially or wholly funded with the United States Department of Housing and Urban Development monies. The RDA shall examine and consider a contractor's or vendor's potential for success by providing employment and business opportunities to City residents prior to acting on any proposed contract award.

49. **NA If you intend to use HOME funds for Tenant-Based Rental Assistance, describe the local market conditions that led to the use of the HOME funds for a tenant-based rental assistance program.**

PY 2013 Action Plan HOME/ADDI response:

The City of Green Bay's 2013 Annual Action Plan will not be using any HOME funds for TBRA.

50. **NA If the TBRA program will target or provide preference for a special needs group, identify that group from the Consolidated Plan as having an unmet need and show that the preference is needed to narrow the gap in benefits and services received by that population?**

PY 2013 Action Plan HOME/ADDI response:

The City of Green Bay's 2013 Annual Action Plan will not be using any HOME funds for TBRA.

51. **NA** If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
- a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

PY 2013 Action Plan HOME/ADDI response:

The City of Green Bay's 2013 Annual Action Plan will not be using HOME funds to refinance existing debt secured by multi-family housing.

52. **NA** If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
- a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

PY 2013 Action Plan HOME/ADDI response:

The City of Green Bay does not receive ADDI funds.

Housing Opportunities for People with AIDS NA

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

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

53. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

PY 2013 Action Plan HOPWA response:

The City of Green Bay does not receive HOPWA funds.

54. Specify the one-year goals for the number of low-income households to be provided affordable housing using HOPWA funds for short-term rent, mortgage, and utility payments to prevent homelessness; tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

PY 2013 Action Plan HOPWA response:

The City of Green Bay does not receive HOPWA funds.

55. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

PY 2013 Action Plan HOPWA response:

The City of Green Bay does not receive HOPWA funds.

56. Identify the method for selecting project sponsors (including providing full access to grassroots, faith-based and other community organizations).

PY 2013 Action Plan HOPWA response:

The City of Green Bay does not receive HOPWA funds.

57. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

PY 2013 Action Plan HOPWA response:

The City of Green Bay does not receive HOPWA funds.

Other Narrative

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