

CITY OF NAPERVILLE  
*Steve Chirico, Mayor*

CITY CLERK'S OFFICE

2016 ANNUAL  
ACTION PLAN  
(YEAR 2)



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# Executive Summary

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

### 1. Introduction

The City of Naperville is a Community Development Block Grant (CDBG) entitlement community as defined by Title I of the Housing and Community Development Act of 1974. Naperville receives an annual block grant that can be used to address critical and unmet community needs, including housing rehabilitation, public facilities, infrastructure, economic development and public services. Grants are allocated by the U.S. Department of Housing and Urban Development (HUD) on a formula basis. This Annual Action Plan (AAP) describes the programs that will be funded with CDBG funds during the 2016 Program Year, which will run from April 1, 2016 to March 31, 2017.

Naperville is a member of the DuPage County Consortium which includes DuPage County, Downers Grove and Wheaton, as well as Naperville. DuPage County is the lead agency for the Consortium. In 2015, Naperville worked with DuPage County to complete a five-year Consolidated Plan for Program Years 2015-2019, beginning April 1, 2015 and ending March 31, 2019. The Consolidated Plan is designed to help communities to assess their affordable housing, homeless and non-housing community development needs and market conditions, set goals and objectives, and develop funding priorities for their CDBG programs based on an analysis of this data. The 2016 Annual Action Plan (AAP) was completed by the City of Naperville and covers the second year of the Consolidated Plan period, which will run from April 1, 2016 to March 31, 2017.

The 2015-2019 Consolidated Plan for the DuPage County Consortium can be viewed on the County's website at:

[http://www.dupageco.org/Community\\_Services/Community\\_Development\\_Commission/1310/](http://www.dupageco.org/Community_Services/Community_Development_Commission/1310/).

### 2. Summarize the objectives and outcomes identified in the Plan

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

In Program Year 2016, the City of Naperville will fund a total of 11 CDBG projects, including grant administration expenses. Naperville will receive a total of \$445,965 in CDBG funding for Program Year 2016.

The 2016 projects are listed below in Table A and the 2016 Objectives and Proposed Outcomes are summarized Table B:

Sort Order	Subrecipient Name	Program Name	CDBG Funding
1	Bridge Communities, Inc.	Crime Prevention Technology and Capital Safety Rehab	\$50,900
2	ChildServ	Naperville Group Home Capital Improvements	\$16,700
3	CHAD	Fund-A-Home	\$100,000
4	DuPage Habitat For Humanity	Home Repair Program	\$50,000
5	DuPage PADS	Olympus Place Flooring Replacement	\$49,684
6	Illinois Independent Living Center	Elevator and Security System Upgrade	\$16,528
7	Naperville CARES	Emergency Financial Assistance Program	\$33,465
8	Naperville Elderly Homes	Masonry Repair and Sealing	\$47,000
9	Ray Graham Association	Starling CILA Renovations	\$26,618
10	City of Naperville	Analysis of Impediments to Fair Housing Choice Study	\$2,500
11	City of Naperville	CDBG Administration	\$52,570
	TOTAL		\$445,965

**Table 1 - TABLE A. Program Year 2016 CDBG Projects**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
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1	Affordable Rental Housing	2015	2019	Affordable Housing	City of Naperville	Housing	CDBG: \$213,212	Rental Units Acquired or Rehabilitated : 73 (180 persons)
2	Affordable Owner Housing	2016	2019	Affordable Housing	City of Naperville	Housing	CDBG: \$50,000	Owner Units Rehabilitated : 10
3	Homeless Housing and Supportive Services	2015	2019	Homeless	City of Naperville	Homeless	CDBG: \$50,900	Public Facility for Low-Mod Housing Benefit: 24 Persons Assisted
4	Special Needs Housing and Supportive Services	2015	2019	Non-Homeless Special Needs	City of Naperville	Special Needs Housing	CDBG: \$43,318	Public Facility for Special Needs Housing Benefit: 15 Persons Assisted
5	Non-Housing Community Development: Public Services	2015	2019	Non-Housing Community Development	City of Naperville	Homeless Prevention	CDBG: \$33,465	Public Service to Prevent Homelessness: 1,300 Persons Assisted
6	Administration and Planning	2015	2016	Administration and Planning	City of Naperville	Administration and Planning	CDBG: \$2,500	Update Analysis of Impediments to Fair Housing Choice Study

**Table 2 - TABLE B. 2016 Proposed Outcomes**

### **3. Evaluation of past performance**

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

The CDBG program provides an extraordinary benefit to the City of Naperville and the City is committed to compliance with all HUD regulations and requirements. During the 2010-2014 Consolidated Plan period, the City of Naperville used CDBG funds to assist over 50 projects benefitting low and moderate income residents through a variety of activities. In Year 1 (Program Year 2015) of the 2015-2019

Consolidated Plan period, the city funded 13 projects in the areas of affordable housing, homelessness assistance, special needs housing and public services.

In partnership with HUD, the City has reviewed and reprogrammed disallowed funds from previous program years. The final repayment of \$128,065 for Program Year 2015 is expected to be completed by March 31, 2016. The City also repaid \$128,065 each in Program Years 2013 and 2014 for a total repayment of \$384,195.

Naperville will continue to request assistance from HUD staff as needed and comply with all HUD directives. For the past two years, the City has achieved a timeliness ratio less than 1.5 times its annual grant allocation and is committed to maintaining timely expenditures of funds in Program Year 2016.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The Citizen Participation Process is conducted according to public participation policies and procedures detailed in the City's CDBG Standard Procedures manual. The process includes at least two public meetings/hearings and a public comment period for citizen's to provide feedback on proposed plans. This year, a public meeting/information session took place on August 18, 2015 and a public City Council Workshop was held on December 1, 2015. The public comment period was open from January 5, 2016 to February 5, 2016 and a public hearing was held on February 2, 2016, during a regularly-scheduled City Council meeting. Following the public hearing, City Council voted to approve the AAP.

#### **5. Summary of public comments**

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

No public comments were received.

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

No public comments were declined.

#### **7. Summary**

Since requests for funding always outstrip available resources, the City strives to allocate funds to the highest priority projects that make the most cost-efficient use of these limited funds.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	NAPERVILLE	City Clerk's Office

Table 3 – Responsible Agencies

### Narrative

**DuPage County Role:** DuPage County is the lead agency for the DuPage County HOME Consortium, of which Naperville is a member. As lead agency, DuPage County is responsible for submitting the Consolidated Plan (ConPlan) on behalf of all members of the Consortium. This document is prepared every five years and submitted to the U.S. Department of Housing and Urban Development (HUD). The ConPlan analyzes affordable housing and community development needs and market conditions in the DuPage County Consortium area, consisting of DuPage County and the Will County portion of the City of Naperville. The ConPlan analysis is used to determine strategic goals and funding priorities for federal funding programs in partnership with citizens, local governments and nonprofit agencies.

An annual update, the Annual Action Plan (AAP), outlines the actions, activities and programs that will take place during the year to address priority needs and goals and explains how these projects will move the goals of the ConPlan forward. The current ConPlan covers Program Years 2015-2019, so the 2016 AAP represents the second year of this period.

**Naperville Role:** The City of Naperville is a Community Development Block Grant (CDBG) entitlement community as defined by Title I of the Housing and Community Development Act of 1974. This means that Naperville is eligible to receive an annual grant that can be used to address critical and unmet community needs, including those for housing rehabilitation, public facilities, infrastructure, economic development and public services. CDBG funds are allocated by the U.S. Department of Housing and Urban Development on a formula basis.

The City of Naperville *City Clerk's Office* has full responsibility for implementing the CDBG program, including administering all grants, preparing the Naperville sections of the Consolidated Plan and preparing the Annual Action Plan (AAP). The City Clerk's Office works closely with other city departments, including the Transportation, Engineering and Development (TED) Business Group and the Finance Department in preparing these documents.

### **Consolidated Plan Public Contact Information**

#### Naperville - Community Development Block Grant (CDBG) Program

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#### DuPage County-DuPage HOME Consortium

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

### **1. Introduction**

As the lead agency for development of the 2015-2019 Consolidated Plan, DuPage County sought input from municipalities, townships, non-profit agencies, citizens and the DuPage Continuum of Care to identify needs and priorities of the Consolidated Plan. The City of Naperville consulted with the County and other municipalities through its membership in the HOME Advisory Group and the DuPage Continuum of Care (DuPage CoC). The HOME Advisory Group advises the County on the use of HOME funds for affordable housing; the Continuum of Care is a coalition of public and private agencies which develops strategies to meet the needs of the homeless in DuPage County.

Naperville also maintains close contact with its own CDBG and Social Services Grant (SSG) grantees and with nonprofit agencies serving Naperville residents. As part of its Citizen Participation Plan, TED holds at least two public meetings/hearings per year to discuss the priorities and procedures of the CDBG and SSG programs. The first of these meetings for 2016, the Pre-Application Workshop, was held on August 18, 2015 and included a Call For Projects for Program Year 2016 (April 1, 2016 – March 31, 2017) and a review of the City's priorities and application process for both the Community Development Block Grant (CDBG) and city-funded Social Services Grant (SSG). A City Council Workshop was held on December 1, 2015, to present the results of the staff evaluation of the applications and to discuss the proposed allocations for the two programs. Additional information on both the Pre-Application Meeting and City Council Workshop is provided in ***AP-12 Participation*** on page 16.

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

The City of Naperville works closely with the DuPage County Consortium to coordinate strategic initiatives to meet housing, health, mental health, education, social services, and community development needs. The DuPage County Consortium coordinates the efforts of county-wide networks and coalitions by providing leadership; identifying priority needs, strategies, and funding opportunities; analyzing performance; and sharing knowledge with service providers, including the DuPage County Continuum of Care. The City also maintains informal contact with agencies and the public throughout the year.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The City of Naperville is a member of the DuPage County Continuum of Care (DuPage CoC), composed of public and private agencies charged with meeting the housing, health, and social service needs of the chronically homeless, families with children, veterans and other homeless populations. The long-term mission of the DuPage CoC is to develop and support effective strategies to end homelessness in DuPage County. The DuPage County Department of Community Services is the lead agency for the DuPage CoC.

In addition to participating in bi-annual DuPage CoC meetings, supporting agencies that provide assistance to the homeless is a high priority for both the CDBG and Social Services Grant programs. City staff works closely with subrecipients and grantees to implement the goals of the 2008 DuPage County Plan to End Homelessness, including homelessness prevention, outreach, rapid rehousing, maintaining/increasing affordable housing, providing supportive services and moving towards self-sufficiency. The City directly funds emergency rent/utility assistance; transitional housing for individuals and families; transitional housing for victims of domestic violence; outreach, counseling and transitional housing for youth; transitional housing and counseling for recovering substance abusers; permanent housing for chronically homeless individuals; affordable rental housing rehabilitation; and a wide variety of supportive services including mental health counseling, substance abuse prevention, food assistance and employment counseling.

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

The City of Naperville does not receive ESG funds, but does provide feedback and assistance with the development of performance standards, evaluation, and development of policies and procedures for HMIS administration through its participation in the DuPage CoC.

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

**Table 4 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	360 Youth Services
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Unaccompanied youth
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Council Workshop - speaker.Coordinate with other homeless services providers.
2	<b>Agency/Group/Organization</b>	A Man In Recovery Foundation
	<b>Agency/Group/Organization Type</b>	Services - Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Substance Abuse Treatment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.New locally funded program.
3	<b>Agency/Group/Organization</b>	Bridge Communities
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Fund additional services to newly acquired transitional housing.

4	<b>Agency/Group/Organization</b>	CHILDSERV
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Unaccompanied youth Public Services - Abused Children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.CDBG-funded rehab of housing for abused/neglected children.
5	<b>Agency/Group/Organization</b>	Community Access Naperville
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Coordinate with other providers of recreational programs for disabled children.
6	<b>Agency/Group/Organization</b>	Community Career Center
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Local funding of employment services.

7	<b>Agency/Group/Organization</b>	DUPAGE HABITAT FOR HUMANITY
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Interview - Create new CDBG-funded housing rehab program.
8	<b>Agency/Group/Organization</b>	DUPAGE PADS
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Continue funding services and rehab of permanent supportive housing for chronically homeless.
9	<b>Agency/Group/Organization</b>	DuPage Senior Citizens Council
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy Public Services - Elderly
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Local funding of services for elderly persons.

10	<b>Agency/Group/Organization</b>	ECUMENICAL ADULT CARE OF NAPERVILLE
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Public Services - Elderly
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Local funding of services for elderly persons.
11	<b>Agency/Group/Organization</b>	Family Shelter Service
	<b>Agency/Group/Organization Type</b>	Housing Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy Public Services - Victims of Domestic Violence
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Local funding of services for elderly persons.
12	<b>Agency/Group/Organization</b>	ILLINOIS INDEPENDENT LIVING CENTER, KATHARINE MANOR APARTMENTS
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.CDBG funding of capital improvements for housing for persons with disabilities.

13	<b>Agency/Group/Organization</b>	LOAVES & FISHES COMMUNITY PANTRY
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Public Services - Food & Nutrition
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Coordinate with other homeless services providers.
14	<b>Agency/Group/Organization</b>	Naperville Elderly Homes
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Housing - Elderly Persons
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.CDBG funding of capital improvements for housing elderly persons.
15	<b>Agency/Group/Organization</b>	NAPERVILLE HERITAGE SOCIETY
	<b>Agency/Group/Organization Type</b>	Other government - Local Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.information on architectural barrier removal in public facilities.
16	<b>Agency/Group/Organization</b>	NAPERVILLE CARES
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.CDBG funding of homelessness prevention services.
17	<b>Agency/Group/Organization</b>	PACT, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Local funding of services for persons with disabilities.
18	<b>Agency/Group/Organization</b>	RAY GRAHAM ASSOCIATION FOR PEOPLE WITH DISABILITIES
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.CDBG and local funding of capital improvements for housing elderly persons.
19	<b>Agency/Group/Organization</b>	SENIOR HOME SHARING
	<b>Agency/Group/Organization Type</b>	Housing Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Local funding for services for elderly persons in shared housing.



20	<b>Agency/Group/Organization</b>	Serenity House Inc
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless Services - Substance Abuse
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Local funding of housing and services for recovering substance abusers.
21	<b>Agency/Group/Organization</b>	Turning Pointe Autism Foundation
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.
22	<b>Agency/Group/Organization</b>	YMCA of Metropolitan Chicago
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Public Services - Children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting - provide information.Local funding of after-school services to low-income children.

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

DuPage County and the City of Naperville attempted to consult with a wide variety of nonprofit agencies and local organizations to complete the Consolidated Plan. All Naperville grantees and subrecipients who received or applied for funding over the past three years were invited to the City’s public meetings/hearings. No agency types were intentionally excluded from consultation.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	DuPage Continuum of Care	Needs Assessment/Goals and Objectives

**Table 5 - Other local / regional / federal planning efforts**

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

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

The City of Naperville encourages residents, public service organizations, and other interested parties to participate in the development of the Consolidated Plan and Annual Action Plans by attending public meetings and public hearings held at various stages of plan development. The City of Naperville opened its Program Year 2016 Community Development Block Grant (CDBG) public participation process and call for projects with a public meeting/pre-application information session from 10:00 a.m. – 12:00 noon on Tuesday, August 18, 2015, at the Naperville Municipal Center. The public meeting/call for projects also included the city-funded Social Services Grant (SSG) program for 2016 (May 1, 2015-April 30, 2016). City staff provided an overview of both programs and presented information on the Consolidated Plan and Annual Action Plan (AAP), including funding priorities, application procedures, timelines, evaluation criteria and changes from previous years. A total of 41 participants attended and had the opportunity to comment and ask questions on community development priorities, plans and programs. City staff was also available to answer additional questions and provide technical assistance prior to the application deadline on Wednesday, September 16, 2015.

A City Council Workshop was held from 6:00 p.m. - 7:00 p.m. and 8:00 p.m. – 8:30 p.m. on Tuesday, December 1, 2015, to review applications and proposed funding recommendations. Council members asked questions about specific proposals and their relationship to community development priorities, as well as the rationale for specific funding recommendations. The meeting was fully open to the public and approximately 50 people attended; 13 people addressed the Council directly, primarily regarding SSG funding. The workshop was also broadcast on cable TV channel WCNC. After hearing from the speakers, City Council voted to allocate \$475,000 in General Funds to the SSG program. This amount represented a significant increase from the \$250,000 that had been recommended during previous budget discussions.

Both the public meeting/pre-application information session and City Council Workshop were publicized in advance on the City's website, <http://www.naperville.il.us>, and through press releases to local media outlets. Materials presented at the public meeting, including PowerPoint presentations and applications, were available on the website the day following the meeting. Nonprofit organizations with a presence in Naperville also received direct emails advertising the information session and call for projects.

A notice announcing the public comment period and public hearing for the City’s Consolidated Plan and Annual Action Plan was published in the Naperville Sun on Sunday, January 3, 2016. The notice included the date, time and location of the public hearing, dates of the public comment period, public review locations and information on how to submit comments. The Program Year 2016 Annual Action Plan was posted on the City of Naperville website, <http://www.naperville.il.us>, at the Naperville Municipal Center and at three Naperville public library locations from Tuesday, January 5, 2016 to Friday, February 5, 2016. The website and public notice also included directions on how to view the full Consolidated Plan on DuPage County's website or at the County offices.

A public hearing to hear citizen comments on the plan was held at the regularly scheduled City Council meeting on Tuesday, February 3, 2015, after which the City Council voted to formally adopt the Annual Action Plan. No public comments were received either during the public comment period or at the public hearing.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	A total of 41 people attended the public meeting/information session on August 18, 2015, not including city staff.	Attendees commented on the priorities and asked numerous questions regarding programs, evaluation criteria and application submission.	All questions were answered in as much detail as possible. No comments or questions were declined.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	City Council Workshop	Non-targeted/broad community	The Workshop was held on December 1, 2015, to review applications for Community Development Block Grant funds. Approximately 50 people attended, plus city staff and elected officials. Thirteen (13) people addressed the City Council.	The meeting was not open for public comment. No comments were received by Staff following the meeting.	Not applicable.	
3	Public Meeting	Non-targeted/broad community	The public hearing was held during the regularly scheduled City Council meeting on Tuesday, February 2, 2016.	No comments were received.	Not applicable.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Comment Period	Non-targeted/broad community	The public comment period was advertised in the Naperville Sun on Sunday, January 3, 2016 and was open from Tuesday, January 5, 2016 to Friday, February 5, 2016. The Annual Action Plan was posted on the City's website at <a href="http://www.Naperville.il.us">http://www.Naperville.il.us</a> . Hard copies were available at three public library branches and at the Naperville Municipal Center.	No comments were received.	Not applicable.	

**Table 6 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

As a metropolitan city with over 50,000 residents, Naperville qualifies as an entitlement community for the federal Community Development Block Grant (CDBG) Program. Entitlement communities receive annual grants from the U.S. Department of Housing and Urban Development (HUD) to carry out a wide range of community development activities directed towards revitalizing neighborhoods, increasing economic development, and improving community facilities and services. Grantees must give maximum priority to activities that benefit low and moderate income persons, aid in the prevention or elimination of slums or blight, and meet urgent community development needs that pose a serious to the health or welfare of the community. Grantees have wide flexibility to develop their own programs, activities and funding priorities so long as they meet one of these national objectives. The Naperville City Council establishes the allocations for the use of CDBG funds based on the priorities set forth in the five-year Consolidated Plan.

Allocations for each CDBG entitlement grantee are determined annually by HUD following adoption of the federal budget by Congress. The City of Naperville will receive \$445,965 for Program year 2016. No program income is anticipated, though some funds from Program Year 2015 activities that come in under budget may also be available. **Please see the Discussion below for information on Contingency Provisions the City adopted prior to receiving its final allocation amount on February 16, 2016.**

For succeeding years covered by this Consolidated Plan, the City is currently estimating that annual CDBG allocations will be approximately \$400,000 for a total of \$1,200,000 in years 2017-2019. Actual allocations are expected to vary based on several factors, including the amount of funds appropriated by Congress, the total number of entitlement communities, changes in the components of the formula used by HUD to determine allocation amounts. Other resources that may be available to Naperville residents include funds from the Housing Choice Voucher Program, Social Security Disability (SSI) Program, HOME Investment Partnerships Act (HOME), Emergency Solutions Grant (ESG), Homeless Continuum of Care programs, Permanent Housing for the Handicapped Program, Emergency Community Services Homeless Grant Program, Low-Income Energy Assistance Program (LIHEAP), and Low-Income Housing Tax Credits (LIHTC). These programs are available to low and moderate income individuals and households, to nonprofit organizations, private developers and local. The funds are administered by DuPage

County, federal, state and local agencies. Actual dollar amount available are dependent on income eligibility and funding availability.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	445,965	0	0	445,965	1,200,000	Annual CDBG allocation plus any prior year resources available.

**Table 7 - Expected Resources – Priority Table**

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



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

No publically owned land or property will receive public funding in Program Year 2016 to address the needs identified in the ConPlan. New projects may be added in succeeding years as deemed necessary to meet the City's goals, particularly in the area of ADA compliance.

**Discussion**

**Goals and Objectives:** The City of Naperville will use its Program year 2016 allocation to fund 11 projects, including Program Administration (\$52,570). Program Administration is not included in the Year 2 Annual Action Plan Goals and Objectives.

**Contingency Provisions:** Per HUD NOTICE CPD-16-01, HUD provided Grantees "Guidance on Submitting Consolidated Plans and Annual Action Plans for Fiscal Year (FY) 2016." This guidance instructs grantees not to submit their Consolidated Plan and/or Annual Action Plan until after HUD announces the Program Year formula allocation amounts. Since the amount of Naperville's Program Year 2016 grant allocation was unknown at the time of the publication of the draft plan (January 5, 2016), the anticipated CDBG allocation of \$410,000 is an estimate, and in the event that the final CDBG allocation is higher or lower than \$410,000, the City of Naperville may add, subtract or transfer amounts among identified projects, as noted below, without publishing a substantial amendment. In the event that actual grant amounts are more or less than anticipated, the following contingency provisions will apply:

**In the event that the final grant allocation exceeds \$410,000, the City may undertake the following change in proposed activities:**

- Add one of more CDBG-eligible public service activities, transferred from the Social Services Grant (SSG) Program, in an amount not to exceed the amount adopted for allocation to the program by the Naperville City Council, with total public services costs to remain within the 15% HUD cap on public service activities. Public service activities to be funded will focus on *Homeless Services*, including homelessness prevention through temporary rent and utility assistance, overnight shelter services and services to support permanent housing for chronically homeless persons;
- Add up to \$10,000 in funding for a Program Year 2015 project, the Analysis of Impediments to Fair Housing Choice study, should cost proposals exceed the Program Year 2015 funding of \$25,000, with total administration costs to remain within the annual 20% HUD cap on administrative/planning activities.

**In the event that the final grant allocation is less than \$410,000**, the proposed funding amounts for all activities will be proportionally decreased to match the actual allocation amount.

Under Section V.B.2 and V.B.3 of the Notice, HUD issued a waiver of 24 CFR 570.200(h), allowing the effective date of a grantee's FY 2016 grant agreement to be the **earlier** of either the grantee's program year start date or the date that the consolidated plan/action plan (with actual allocation amounts) is received by HUD. In the event that the award of Program Year 2016 funding is delayed, the City will utilize this waiver to the extent necessary to treat the effective date of the grant agreement as the program year start date (April 1, 2016) or the date that the Consolidated Plan and/or Annual Action Plan (with actual allocation amounts) is received by HUD, *whichever is earlier*.

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Rental Housing	2015	2019	Affordable Housing	City of Naperville	Housing	CDBG: \$213,212	Rental units rehabilitated: 168 Household Housing Unit
2	Affordable Owner-Occupied Housing	2016	2019	Affordable Housing	City of Naperville	Housing	CDBG: \$50,000	Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	Homeless Housing and Supportive Services	2015	2019	Homeless	City of Naperville	Homeless Individuals and Families	CDBG: \$50,900	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 8 Households Assisted
4	Special Needs Housing and Supportive Services	2015	2019	Non-Homeless Special Needs	City of Naperville	Housing	CDBG: \$43,318	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 15 Households Assisted
5	Non-Housing Community Development: Homeless	2015	2019	Homeless	City of Naperville	Homeless Individuals and Families	CDBG: \$33,465	Homelessness Prevention: 1300 Persons Assisted

**Table 8 - Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Rental Housing
	<b>Goal Description</b>	<p>To preserve and increase the quality and availability of affordable rental housing through rehabilitation, acquisition and construction, where feasible.</p> <p>A total of \$213,212 will be used to acquire and rehabilitate affordable rental housing for approximately 180 seniors, families, physically disabled and formerly chronically homeless people:</p> <p><i>Community Housing Advocacy and Development (CHAD)</i> - \$100,000 to acquire a distressed single-family home to be used as affordable rental housing for a low or moderate income family (4-6 people).</p> <p><i>DuPage PADS</i> - \$49,684 to rehabilitate and improve the livability of 11 affordable rental apartments housing approximately 18 formerly chronically homeless individuals.</p> <p><i>Illinois Independent Living Center (Katharine Manor Apartments)</i> - \$16,528 to improve the elevator operating system in an affordable rental complex providing independent living for 31 people with severe physical disabilities.</p> <p><i>Naperville Elderly Homes (Martin Avenue Apartments)</i> - \$47,000 to repair and upgrade masonry at independent living apartment complex for 125 low and moderate income elderly tenants.</p>
2	<b>Goal Name</b>	Affordable Owner-Occupied Housing
	<b>Goal Description</b>	<p>To preserve and increase the quality and affordability affordable owner-occupied housing through rehabilitation and other assistance.</p> <p>A total of \$50,000 will be used to rehabilitate approximately 10 homes occupied by low and moderate income homeowners.</p> <p><i>DuPage Habitat for Humanity</i> - \$50,000 to rehabilitate single-family homes occupied by low and moderate income homeowners.</p>

3	<b>Goal Name</b>	Homeless Housing and Supportive Services
	<b>Goal Description</b>	<p>To support essential services, facility improvements and facility development to enable homeless and at-risk persons to access suitable living environments.</p> <p>A total of \$50,900 will be used to improve security and eliminate code violations at a transitional housing apartment complex housing approximately 24 people.</p> <p><i>Bridge Communities</i> - \$50,900 to install new lighting, fire-rated doors and buzzers/mailboxes and bring balconies up to code.</p>
4	<b>Goal Name</b>	Special Needs Housing and Supportive Services
	<b>Goal Description</b>	
5	<b>Goal Name</b>	Non-Housing Community Development: Homeless
	<b>Goal Description</b>	<p>To reduce the incidence of poverty and homelessness by providing public services to prevent homelessness and assist homeless and at-risk persons to become self-sufficient.</p> <p><i>Naperville CARES</i> - \$33,465 for homelessness prevention through temporary rent and utility assistance benefitting approximately 1,300 persons.</p>

**Table 9 – Goal Descriptions**

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

The City of Naperville's Program Year 2016 CDBG projects are described below:

#	Project Name
1	Bridge Communities, Inc. - Crime Prevention Technology/Capital Safety Rehab
2	ChildServ - Naperville Group Home Capital Improvements
3	Community Housing Advocacy and Development (CHAD) - Fund-A-Home
4	DuPage Habitat for Humanity - Home Repair Program
5	DuPage PADS - Olympus Place Flooring Replacement
6	Illinois Independent Living Center - Elevator and Security System Improvements
7	Naperville Elderly Homes - Masonry Improvements and Sealing
8	Ray Graham Association - Starling CILA Exterior Improvements
9	Naperville CARES - Emergency Financial Assistance Program
10	City of Naperville - Analysis of Impediments to Fair Housing Choice
11	City of Naperville - Program Administration

**Table 10 – Project Information**

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

To prepare the 2015-2019 Consolidated Plan, DuPage County and the City of Naperville developed priorities, goals and objectives. All projects meet the national objectives of the CDBG program and are designed to address the needs of low and moderate-income persons:

**Affordable Rental Housing** – Preserve and increase quality and availability of affordable rental housing through rehabilitation.

**Affordable Owner-Occupied Housing** - Preserve and increase the quality and availability of affordable owner-occupied housing through rehabilitation.

**Homeless** – Support essential services and facility improvements to enable homeless persons to access suitable living environments.

**Special Needs** - Support essential services and facility improvements to enable persons with special needs to access suitable living environments.

**Non-Housing Community Development: Homeless** – Reduce the incidence of poverty and homelessness by providing public services to prevent homelessness.

**Non-Housing Community Development: Public Services** - Assist low-income households and reduce the

incidence of poverty by providing public services to enhance life skills and self-sufficiency.

The primary obstacles to meeting underserved needs are the unavailability and uncertainty of adequate funding for projects which is compounded by the difficulty of funding housing-related projects in a high-cost community such as Naperville. These issues are addressed at greater length in Section AP-85 on Actions planned to address obstacles to meeting underserved needs.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Bridge Communities, Inc. - Crime Prevention Technology/Capital Safety Rehab
	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Homeless Housing and Supportive Services
	<b>Needs Addressed</b>	Homeless Individuals and Families
	<b>Funding</b>	CDBG: \$50,900
	<b>Description</b>	Funds will be used to install enhanced lighting in the parking garage and entryways of an apartment building providing transitional housing to homeless families, and to replace wood doors with fire-rated doors, install a fire alarm system, install new buzzers and secure mailboxes, and bring balcony railings up to code. Eight (8) households will benefit from this activity. Funding will consist of \$50,900.00 in CDBG funds leveraged with additional funding provided by the subrecipient.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is projected that eight (8) households comprising approximately 24 people will benefit from this activity.
	<b>Location Description</b>	432 E. Bailey, Naperville, IL 60540.
<b>Planned Activities</b>	<ol style="list-style-type: none"> <li>1. Install seven (7) LED photocells in parking garage and entryways.</li> <li>2. Install ten (10) fire-rated doors.</li> <li>3. Bring railings on eight (8) balconies up to code.</li> <li>4. Install updated buzzer system and new secure mailboxes.</li> </ol>	
<b>Project Name</b>	ChildServ - Naperville Group Home Capital Improvements	



<b>2</b>	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Special Needs Housing and Supportive Services
	<b>Needs Addressed</b>	Housing
	<b>Funding</b>	CDBG: \$16,700
	<b>Description</b>	A total of \$16,700 in CDBG funds will be used to replace deteriorated windows with energy-efficient windows, tuckpoint, and replace damaged carpeting in a group residence for abused and/or neglected adolescent girls.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 8-10 girls between 13 and 18 years of age.
	<b>Location Description</b>	146 N. Sleight Street, Naperville, IL 60540
	<b>Planned Activities</b>	<ol style="list-style-type: none"> <li>1. Window replacement with energy-efficient windows.</li> <li>2. Tuckpoint garage.</li> <li>3. Remove carpet and repair wood floors.</li> </ol>
<b>3</b>	<b>Project Name</b>	Community Housing Advocacy and Development (CHAD) - Fund-A-Home
	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Affordable Rental Housing
	<b>Needs Addressed</b>	Housing
	<b>Funding</b>	CDBG: \$100,000

	<b>Description</b>	Acquisition of a distressed single-family home or duplex which will be rehabilitated and rented at an affordable rent to a low or moderate-income family. A total of \$100,000 in CDBG funds will be leveraged with additional funding provided by the subrecipient.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One (1) family consisting of 4-6 persons.
	<b>Location Description</b>	To be determined.
	<b>Planned Activities</b>	Acquisition of one (1) single-family or duplex property in incorporated Naperville, Illinois.
4	<b>Project Name</b>	DuPage Habitat for Humanity - Home Repair Program
	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Affordable Owner-Occupied Housing
	<b>Needs Addressed</b>	Housing
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	A total of \$50,000 in CDBG funding will be used to provide financial and technical assistance to single-family homeowners to make needed home repairs, including eliminating code violations, health and safety issues and improving energy efficiency.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Ten (10) low and moderate-income homeowner households. Target groups will include senior citizens and veterans.
	<b>Location Description</b>	To be determined.

	<b>Planned Activities</b>	Rehabilitation of 10 owner-occupied single-family homes.
<b>5</b>	<b>Project Name</b>	DuPage PADS - Olympus Place Flooring Replacement
	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Affordable Rental Housing
	<b>Needs Addressed</b>	Housing
	<b>Funding</b>	CDBG: \$49,684
	<b>Description</b>	Replace damaged carpeting and flooring with vinyl plank flooring in apartment complex providing permanent supportive housing to formerly chronically homeless individuals.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eleven (11) extremely low-income households comprising approximately 18 persons.
	<b>Location Description</b>	5 Olympus Drive, Naperville, IL 60540.
	<b>Planned Activities</b>	Replace damaged carpeting and flooring with vinyl plank flooring.
<b>6</b>	<b>Project Name</b>	Illinois Independent Living Center - Elevator and Security System Improvements
	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Affordable Rental Housing
	<b>Needs Addressed</b>	Housing
	<b>Funding</b>	CDBG: \$16,528
	<b>Description</b>	Upgrade elevator operating system in independent living apartment complex providing affordable rental housing for persons with severe physical disabilities, eliminating frequent elevator breakdowns.
	<b>Target Date</b>	3/31/2017

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 31 low-income renters with severe physical disabilities will benefit from this project.
	<b>Location Description</b>	Katharine Manor Apartments, 1141 Iroquois Avenue, Naperville, IL 60563.
	<b>Planned Activities</b>	Install heavy-duty closed-loop motor-driven elevator doors with hand controls in the event of power disruption.
7	<b>Project Name</b>	Naperville Elderly Homes - Masonry Improvements and Sealing
	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Affordable Rental Housing
	<b>Needs Addressed</b>	Housing
	<b>Funding</b>	CDBG: \$47,000
	<b>Description</b>	Remove damaged masonry joints and sealant, and install new joints and sealant at apartment building providing independent living apartments to low and moderate-income senior citizens.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 125 low and moderate-income senior citizens.
	<b>Location Description</b>	Martin Avenue Apartments, 310 W. Martin Avenue, Naperville, IL 60540.
	<b>Planned Activities</b>	Remove damaged masonry joints and sealant, and install new joints and sealant at apartment building providing independent living apartments to senior citizens.
8	<b>Project Name</b>	Ray Graham Association - Starling CILA Exterior Improvements
	<b>Target Area</b>	City of Naperville

	<b>Goals Supported</b>	Special Needs Housing and Supportive Services
	<b>Needs Addressed</b>	Housing
	<b>Funding</b>	CDBG: \$26,618
	<b>Description</b>	Rehabilitation and capital improvements to a Community Integrated Living Arrangement (CILA) for severely disabled people.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Six (6) adults with severe developmental disabilities.
	<b>Location Description</b>	Starling CILA, 52 Starling Lane, Naperville, IL 60540.
	<b>Planned Activities</b>	1. Replacement of roof. 2. Replacement of exterior patio. 3. Regrading of rear yard area.
9	<b>Project Name</b>	Naperville CARES - Emergency Financial Assistance Program
	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Non-Housing Community Development: Homeless
	<b>Needs Addressed</b>	Non-Housing Community Development Needs
	<b>Funding</b>	CDBG: \$33,465
	<b>Description</b>	Homelessness Prevention/Emergency Assistance Program for individuals and families at high risk of homelessness. Provides emergency financial assistance to cover rent, mortgage, and utility payments. Agency work with clients to connect them to other resources.
	<b>Target Date</b>	3/31/2017

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 1,300 low and moderate-income individuals at high risk of homelessness due to inability to pay rent, mortgage or utility payments.
	<b>Location Description</b>	Citywide.
	<b>Planned Activities</b>	<ol style="list-style-type: none"> <li>1. Provide temporary rent, mortgage, and/or utility payments to prevent recipients from becoming homeless.</li> <li>2. Coordinate services with other nonprofits, social service and government agencies to obtain needed services to resolve the crisis for the individual and family, allowing them to return to self-sufficiency.</li> </ol>
10	<b>Project Name</b>	City of Naperville - Analysis of Impediments to Fair Housing Choice
	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Affordable Rental Housing Affordable Owner-Occupied Housing Special Needs Housing and Supportive Services Homeless Housing and Supportive Services
	<b>Needs Addressed</b>	Housing
	<b>Funding</b>	CDBG: \$2,500
	<b>Description</b>	Costs to hire and manage a consultant to prepare a new Analysis of Impediments to Fair Housing Choice Study.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Study will analyze the impediments to fair housing choice and recommend strategies to eliminate barriers.
	<b>Location Description</b>	Not applicable.

	<b>Planned Activities</b>	1. Development of Analysis of Impediments to Fair Housing Choice.
<b>11</b>	<b>Project Name</b>	City of Naperville - Program Administration
	<b>Target Area</b>	City of Naperville
	<b>Goals Supported</b>	Affordable Rental Housing Affordable Owner-Occupied Housing Special Needs Housing and Supportive Services Homeless Housing and Supportive Services Non-Housing Community Development: Homeless
	<b>Needs Addressed</b>	Homeless Individuals and Families Non-Housing Community Development Needs Housing
	<b>Funding</b>	CDBG: \$52,570
	<b>Description</b>	Administration and management of the Program Year 2016 Community Development Block Grant (CDBG) Program.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable. Program Administration.
	<b>Location Description</b>	Naperville Municipal Center, 400 S. Eagle Street, Naperville, IL 60540.
	<b>Planned Activities</b>	1. Program Administration.

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

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

The City of Naperville will not direct assistance to specific geographic areas during the 2016 program year. Projects selected for funding represent several neighborhoods and were chosen for their ability to meet the national objectives of the CDBG program and the goals of the Consolidated Plan. All of the projects will primarily or exclusively benefit low and moderate income individuals with emphasis on low-income renters, low and moderate-income homeowners, homeless persons transitioning to permanent housing, and persons with special needs. One project will include interior and exterior lighting improvements designed to enhance the physical safety of residents of an apartment complex.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City of Naperville	100

**Table 11 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The City of Naperville has not directed assistance to any specific geographic area for Program Year 2016.

### **Discussion**

The City of Naperville will continue to monitor conditions in areas with concentrations of low income households and will consult with city agencies and social service organizations serving households in these areas to determine how best to assist these households.



## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

Naperville will undertake additional actions to address the following areas of concern:

- Meeting Underserved Needs
- Reducing Lead-Based Paint Hazards
- Reducing the Number of Poverty-Level Families
- Developing Institutional Structure
- Enhancing Coordination Between Public and Private Housing and Social Service Agencies

### **Actions planned to address obstacles to meeting underserved needs**

The City will use the priorities established in the Consolidated Plan for Program Years 2015-2019 to guide the allocation of CDBG funds. The City will continue to utilize public meetings, workshops, surveys and consultations with service providers, as well as analyzing new data as it becomes available, to improve its understanding of community needs.

City staff will also continue to participate in the DuPage County HOME Advisory Commission to learn about available services and advise the commission about Naperville's specific needs. The City will also review the recommendations of the new Analysis of Impediments to Fair Housing Choice (AI) and other housing studies to assist in identifying underserved populations.

Knowledge obtained from the above sources will be used to determine which community needs are not currently being addressed adequately by existing programs, prevent duplication of services and improve coordination between service providers.

An additional obstacle to meeting underserved needs is the unavailability and uncertainty of adequate funding for projects. This year, the City received eligible applications for CDBG funding totaling \$574,730, of which only \$357,430 could be funded. The actual amount of the CDBG allocation fluctuates from year to year and is influenced by factors beyond the City's control. Even if final funding amounts exceed \$410,000, it is extremely unlikely that they will be sufficient to fully fund all applications. In future years, the City may consider researching and applying for additional sources of community development funding.

### **Actions planned to foster and maintain affordable housing**

The City of Naperville is expected to reach residential build-out within the next five to ten years. The high cost of developing land makes the construction of affordable housing a challenge in the undeveloped areas of the City. Undeveloped farmland in the Naperville area has sold for as high as

\$80,000 per acre, which forces developers to build larger homes for over \$300,000 in order to break even or make a profit. With a median home value of \$377,900 (2014 American Community Survey) acquiring affordable existing units is also a challenge, even in lower-cost areas of the City. To address some of the barriers to the provision of affordable housing, the Staff will undertake the following strategies:

- Complete CDBG Projects designed to promote and sustain the availability of affordable housing for a variety of groups. – CDBG projects proposed for funding in Program Year 2016 the availability and sustainability of affordable housing for Naperville residents with the greatest housing needs – seniors, low-income owners and renters, people with physical, mental and cognitive disabilities, and homeless adults and children.
- Develop a new Analysis of Impediments to Fair Housing Choice (AI). - The City's most recent Analysis of Impediments to Fair Housing Choice was developed in 2007. The City has committed to completing this study in Program Year 2016 and has allocated a total of \$27,500 in CDBG funds (PY 2015: \$25,000, PY 2016: \$2,500) to hire a consultant to conduct the study and develop recommendations based on it. Once the results of the study are available, staff will work to develop programs, educational materials and incentives based on its recommendations. Though these programs will be designed to enhance fair housing, the close relationship between fair housing and affordability makes it likely that the latter will also be addressed
- Update current Affordable Housing technical assistance materials. – The City recently updated its Housing Advisory Commission (HAC) website and will update other technical assistance materials, including adding a directory of housing resources to the HAC website.
- Identify key issues. – City staff will research key issues that can impact the availability of affordable housing, such as use and acceptance of Housing Choice Vouchers. Findings will be discussed by the HAC, which may propose changes to City policies, regulations or ordinances to better promote preservation and development of affordable housing.
- Develop and collaborate on additional studies to assess the current demand for affordable owner and renter units in the City of Naperville and identify opportunities to address these needs. The City will undertake studies to understand and quantify the demand for affordable units in the City and to recommend strategies for addressing these needs (Affordable Housing Planning and Appeal Act). The City will also collaborate with other agencies on regional or countywide initiatives, such as Impact DuPage (DuPage County, Chicago Metropolitan Agency for Planning (CMAP), HOPE Fair Housing).

### **Actions planned to reduce lead-based paint hazards**

An assessment of the need for lead-based paint remediation will be undertaken for all CDBG-funded housing projects. The City will communicate with subrecipients and monitor all projects to ensure that lead-based paint regulations are implemented correctly in rehabilitation projects. Applicable lead-based paint regulations will be followed for all rehabilitation projects in which the building was constructed before 1978, including required testing. If lead-based paint is found to be present, contractors certified

in safe work practices will be used for abatement. If children under the age of six are residing in the building they will be referred to the County Health Department for testing for lead-based paint exposure. Clearance tests will be performed by an EPA certified risk assessor and a certified laboratory upon project completion. The City has an arrangement with DuPage County to assist the City in lead-based paint abatement. All CDBG-funded projects will also take the potential presence of asbestos into consideration.

Most of the potential lead-based paint hazards in Naperville are restricted to the older area of the City where the majority of the housing stock pre-dates 1978. Specifically, this area is bounded by Ogden Avenue on the north, Columbia Street on the east, Hillside Road on the south and the DuPage River on the west. U.S. Census data indicates that there could be as many as 2,700 households that may be at risk of exposure to lead based paint hazards. The City will pay special attention to monitoring rehabilitation projects located in these areas.

### **Actions planned to reduce the number of poverty-level families**

According to the most recent U.S. census data (2010-2014 American Community Survey Five-Year Estimates), only about 4.3 percent of Naperville residents had incomes below the poverty level. However, this percentage represents an increase from 4.1 percent the previous year (2009-2013 American Community Survey Five-Year Estimates). In comparison, the 2000 U.S. Census recorded a poverty rate of only 2.2 percent, which had increased to 3.4 percent by the 2010 U.S. Census. In addition, certain population groups had a significantly higher poverty rate: For female-headed households the poverty rate was 14.8 percent, and for persons with a disability, the poverty rate was 10.9 percent. Minority and foreign-born households also had disproportionately higher poverty rates. In total, nearly 7,000 residents had incomes below the poverty level. To assist poverty-level families, Naperville will implement the following strategies in Program Year 2016:

- Community Development Block Grant (CDBG) Program: A total of \$50,900 will be allocated to improve housing for homeless families working to achieve self-sufficiency and return to permanent housing. Another \$49,684 will be used to improve housing occupied by formerly chronically homeless individuals. Together, the two projects will assist 42 individuals.
- Social Services Grant (SSG) Program: The Social Services Grant (SSG) Program is a crucial component of the City's strategy to reduce the number of poverty-level families. For the 2016 Fiscal Year, a total of \$475,000 will be allocated to organizations and programs that provide assistance to low-income families. These programs include emergency rent and utility assistance, emergency housing, food assistance, employment counseling, substance abuse counseling, mental health counseling, youth services and after-school programs.

In addition to funding specific activities, the City will take the following actions:

- Affordable Housing: Use \$263,212 in CDBG funds to finance additional affordable housing

acquisition and rehabilitation.

- Homelessness Prevention: Use \$33,465 in CDBG funds and \$5,935 in Social Service eGrant funding for homelessness prevention services. Work with social service providers, other governmental and local agencies to further identify the needs of those threatened with poverty and to find resources to meet those needs. This will involve referral for counseling, assistance in paying rent, or providing transportation.
- Neighborhood Improvements: Work with the Naperville Police Department, affordable housing providers and local agencies to implement the Community Policing Through Environmental Design (CPTED) program in low-income and high crime areas. Monitor conditions these areas and work with city agencies and social service organizations to develop neighborhood-based programs to assist these families.
- Youth and Family Services: Work to provide services for low-income youth, including after-school programs, job and career fairs, and substance abuse prevention and education.

### **Actions planned to develop institutional structure**

The City of Naperville will work with city departments, local service providers, and agencies from DuPage County and Will County to implement the Consolidated Plan goals and strategies for 2015-2019.

In addition to the formal structure inherent in administering CDBG funds, the City will pursue informal communication and coordination with public and private housing agencies, other governmental agencies, private businesses, non-profit community agencies and other organizations working to meet the housing assistance and support needs of low and moderate income people in the community.

The City will work with local agencies to coordinate services to eliminate gaps, reduce duplication of programs, and emphasize efficient service delivery for local, state, and federal programs.

The City will continue to participate in the Homelessness Continuum of Care and the DuPage County HOME Advisory Commission to learn and provide advice on how homelessness and affordable housing programs are implemented county-wide.

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

The City will continue to work to strengthen relationships with DuPage County and with county-wide nonprofit social service agencies and housing providers. We will work closely with these organizations to enhance coordination between public and private agencies and between nonprofit agencies providing different services to the same clientele. Many nonprofit agencies have already developed these

partnerships and the City will consult with them to determine how we help to enhance these efforts.

**Discussion**

See individual sections above.

## Program Specific Requirements

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

#### Introduction

This section reports on Naperville's expected Program Income for Program Year 2015, the amount of funds that will be used for urgent needs and on the percentage of CDBG funds that will be used to benefit low and moderate income residents.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	88.21%

#### Discussion

Annual Action Plan  
2016

44

The City of Naperville does not anticipate receiving program income from any of the sources listed above during Program Year 2016. The City does not have any urgent need activities at this time, so over 88% of CDBG funds will be used to benefit low and moderate income residents. Major activities will include acquiring and rehabilitating affordable rental and owner-occupied housing for families, elderly people and people with disabilities, and improving living facilities for homeless families, chronically mentally ill persons and victims of abuse and neglect.

## Attachments



# City of Naperville

## Community Development Block Grant (CDBG) Program Program Year 2016 Annual Action Plan (AAP)

### Summary of Citizen Participation Process

The City of Naperville encourages residents, public service organizations, and other interested parties to participate in the development of the Consolidated Plan and Annual Action Plans by attending public meetings and public hearings held at various stages of plan development. The City of Naperville opened its Program Year 2016 Community Development Block Grant (CDBG) public participation process and call for projects with a public meeting/pre-application information session from 10:00 a.m. – 12:00 noon on Tuesday, August 18, 2015, at the Naperville Municipal Center. The public meeting/call for projects also included the city-funded Social Services Grant (SSG) program for 2016 (May 1, 2015-April 30, 2016). City staff provided an overview of both programs and presented information on the Consolidated Plan and Annual Action Plan (AAP), including funding priorities, application procedures, timelines, evaluation criteria and changes from previous years. A total of 41 participants attended and had the opportunity to comment and ask questions on community development priorities, plans and programs. City staff was also available to answer additional questions and provide technical assistance prior to the application deadline on Wednesday, September 16, 2015.

A City Council Workshop was held from 6:00 p.m. - 7:00 p.m. and 8:00 p.m. – 8:30 p.m. on Tuesday, December 1, 2015, to review applications and proposed funding recommendations. Council members asked questions about specific proposals and their relationship to community development priorities, as well as the rationale for specific funding recommendations. The meeting was fully open to the public and approximately 50 people attended; 13 people addressed the Council directly, primarily regarding SSG funding. The workshop was also broadcast on cable TV channel WCNC. After hearing from the speakers, City Council voted to allocate \$475,000 in General Funds to the SSG program. This amount represented a significant increase from the \$250,000 that had been recommended during previous budget discussions.

Both the public meeting/pre-application information session and City Council Workshop were publicized in advance on the City's website, <http://www.naperville.il.us>, and through press releases to local media outlets. Materials presented at the public meeting, including PowerPoint presentations and applications, were available on the website the day following the meeting. Nonprofit organizations with a presence in Naperville also received direct emails advertising the information session and call for projects.

A notice announcing the public comment period and public hearing for the City's Consolidated Plan and Annual Action Plan was published in the Naperville Sun on Sunday, January 3, 2016 (see Certificate of Publication, attached.). The notice included the date, time and location of the public hearing, dates of

the public comment period, public review locations and information on how to submit comments. The Program Year 2016 Annual Action Plan was posted on the City of Naperville website, <http://www.naperville.il.us>, at the Naperville Municipal Center and at three Naperville public library locations from Tuesday, January 5, 2016 to Friday, February 5, 2016. The website and public notice also included directions on how to view the full Consolidated Plan on DuPage County's website or at the County offices.

A public hearing to hear citizen comments on the plan was held at the regularly scheduled City Council meeting on Tuesday, February 3, 2015, after which the City Council voted to formally adopt the Annual Action Plan. **No public comments were received either during the public comment period or at the public hearing.**

# CHICAGO TRIBUNE

media group

**Sold To:**

City of Naperville City Clerk's Office - CU00437221  
400 S Eagle St  
NAPERVILLE, IL 60540

**Bill To:**

City of Naperville City Clerk's Office - CU00437221  
400 S Eagle St  
NAPERVILLE, IL 60540

## Certificate of Publication:

Order Number: 3846921

Purchase Order: N/A

State of Illinois - Dupage

**Tribune Publishing** does hereby certify that it is the publisher of the Naperville Sun. The Naperville Sun is a secular newspaper, has been continuously published Daily for more than fifty (50) weeks prior to the first publication of the attached notice, is published in the County of Dupage, State of Illinois, is of general circulation throughout that county and surrounding area, and is a newspaper as defined by 715 IL CS 5/5.

This is to certify that a notice, a true copy of which is attached, was published 1 time(s) in the Naperville Sun on Jan 03, 2016.

This notice was also placed on a statewide public notice website as required by 5 ILCS 5/2.1.

PUBLICATION DATES: Jan 03, 2016.

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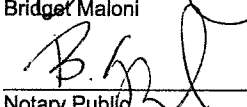
Naperville Sun

Executed at Chicago, Illinois on this

16 Day of Mar, 2016, by  
Day Month Year

**Chicago Tribune Media Group**

  
\_\_\_\_\_  
Bridget Maloni

  
\_\_\_\_\_  
Notary Public



# CHICAGO TRIBUNE

media group

**PUBLIC HEARING AND  
PUBLIC COMMENT PERIOD  
NOTICE CITY OF NAPERVILLE  
COMMUNITY DEVELOPMENT  
BLOCK GRANT FOR THE 2016  
ANNUAL ACTION PLAN**

PUBLIC NOTICE is hereby given to all persons interested that on FEBRUARY 2, 2016 the City Council of the City of Naperville will hold a public hearing to identify the general housing and community development needs of persons who may benefit from its Community Development Block Grant (CDBG). The public hearing is being held to review the 2016 Annual Action Plan, a report that plans how Community Development Block Grant funds will be spent during Program Year 2016 (April 1, 2016-March 31, 2017).

The hearing will be held in the Council Chambers at 400 S. Eagle Street, Naperville, IL 60540 at 7:00 PM. Citizens are invited to address comments either to CDBG Coordinator Ruth Broder at [broder@naperville.il.us](mailto:broder@naperville.il.us) or 630-305-5315 or by public comment at the February 2, 2016 public hearing. A copy of the draft 2016 Annual Action Plan will be available at the Naperville Public Libraries, the Naperville Municipal Center and on the City's website on January 5, 2016. The public comment period will be open from January 5, 2016 to February 5, 2016. Information will also be available on the city's website, <http://www.naperville.il.us/cdbg.aspx>.

Any individual with a disability requesting a reasonable accommodation or a translator in order to participate in a public meeting should contact the Communications Department at least 48 hours in advance of the scheduled meeting. The Communications Department can be reached in person at 400 S. Eagle Street, Naperville, IL, via telephone 630-420-6707 or 630-305-5205 (TDD) or via e-mail at [info@naperville.il.us](mailto:info@naperville.il.us). Every effort will be made to allow for meeting participation.  
1/3/2016 3846921

3846921

## SF-424 and Certifications

**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Naperville

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

36-6006013

**\* c. Organizational DUNS:**

0700008150000

**d. Address:**

**\* Street1:**

400 S. Eagle Street

**Street2:**

**\* City:**

Naperville

**County/Parish:**

**\* State:**

IL: Illinois

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

60540-5278

**e. Organizational Unit:**

**Department Name:**

**Division Name:**

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Ms.

**\* First Name:**

Ruth

**Middle Name:**

**\* Last Name:**

Broder

**Suffix:**

**Title:** Community Planner/CDBG Coordinator

**Organizational Affiliation:**

City of Naperville

**\* Telephone Number:**

(630) 305-5315

**Fax Number:**

**\* Email:**

broderr@naperville.il.us

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development (HUD)

**11. Catalog of Federal Domestic Assistance Number:**

**CFDA Title:**

**\* 12. Funding Opportunity Number:**

14.218

**\* Title:**

Entitlement Grant.

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

[Add Attachment](#)

[Delete Attachment](#)

[View Attachment](#)

**\* 15. Descriptive Title of Applicant's Project:**

Community Development Block Grant: Housing Rehabilitation, Public Facilities Improvements, Public Services and Grant Administration/Planning.

Attach supporting documents as specified in agency instructions.

[Add Attachments](#)

[Delete Attachments](#)

[View Attachments](#)

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="445,965.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="445,965.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

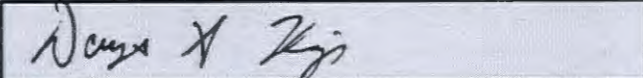
\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:



## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

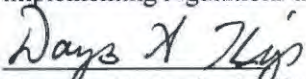
**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
Signature/Authorized Official

3/15/16  
Date

## Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation** – It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** – Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** – It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** – It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2016, one yr. (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

**Compliance with Laws** -- It will comply with applicable laws.

Debra A. King      3/13/16  
Signature/Authorized Official      Date

City Manager  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING:

#### A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.