

ENHANCING NEIGHBORHOODS AND HOUSING



# ANNUAL ACTION PLAN

FY 2023 - 2024



[cityoflorain.org](http://cityoflorain.org)

Department of Building, Housing and Planning

## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The City of Lorain's Annual Action Plan (AAP) for 2023-2024 serves as the City of Lorain's fourth year of the 2020 -2024 Consolidated Plan (ConPlan).

The Annual Action Plan (AAP) is a requirement by the U.S. Department of Housing and Urban Development (HUD) and serves as the City's application for federal funding; the following are opportunities in which the City of Lorain is applying for:

- Community Development Block Grant (CDBG)
- Home Investment Partnership Program (HOME)

The AAP identifies strategies, resources, and networks to assist very low, low, and moderate-income residents through programs managed by the City of Lorain Department of Building, Housing, and Planning.

The City of Lorain's Consolidated Plan (ConPlan) outlines our five-year goals to address the needs of Low-to-moderate (LMI) and Special Needs Residents. The following ConPlan goals are outlined below:

- **Goal 1:** Improve availability and accessibility of affordable housing to people of low and moderate income throughout the City of Lorain.
- **Goal 2:** Reduce Homelessness in the City of Lorain.
- **Goal 3:** Enhance the living environment for persons of low-and moderate-income and special needs populations through public services, public improvement, and community and economic development
- **Goal 4:** Expand the accessibility and coordination of social services to the City of Lorain's low-and moderate-income and special needs populations.
- **Goal 5:** Provide assistance prior to, during, and after community emergency and/or disaster events to prepare for and/or mitigate loss, protect during an event, and aid with recovery (this includes natural disasters and infectious disease outbreaks such as COVID-19 Pandemic).

The City of Lorain continues to evaluate the needs of the community in relation to the ConPlan and our AAPs.

The Community and Economic Development division manages in part CDBG, CDBG-CV funded projects including, public facility projects, public service programming, and eventually economic development programming to assist for-profit businesses.

The Housing division manages in part CDBG, HOME, and HOME-ARP through owner-occupied home rehabilitation and neighborhood revitalization programs. This Division will also spearhead the development of the HOME-ARP projects and activities that will be determined this year.

The City of Lorain continues to build and foster partnerships including but not limited to, the Lorain Metropolitan Housing Authority (LMHA), Continuum of Care (CoC), non-profit and for-profit entities, and neighborhood groups, to assist with the development, implementation, and evaluation of our programs benefiting the needs of the community.

With the assistance of our partners, the City of Lorain Department Building, Housing, and Planning (BHP) increases the quality of life through, affordable housing incentives, improvements to the built environment, addressing blighted structures by demolition, and improved public spaces.

## **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.

### **AFFORDABLE HOUSING**

Like many communities, the City of Lorain has an insufficient inventory of affordable housing available for most income tiers up to 80% Area Median Income (AMI). The majority of the City of Lorain's households fall below the HUD AMI and are disproportionately renters. Individuals who have an AMI of less than 30% are greatest at risk for homelessness and the housing available to them requires a lengthy wait list with an uncertain outcome. The City has also experienced a severe lack of housing development over the past twenty years. Affordable housing remains unattainable due to the lack of units available in the City. The City maintains its ConPlan goal of addressing the priority need for decent housing.

### **SUITABLE LIVING ENVIRONMENT**

The City of Lorain continues to seek to enhance outdoor living spaces, increase and diversify public service programming to serve the needs of the community, and learn more about our business community's needs. As the third goal in the ConPlan, the City preserves its assistance to improve the safety and livability of neighborhoods and increase access to quality public and private facilities and services.

### **EXPANDED ECONOMIC OPPORTUNITY**

In combination with other funding sources, the Department of Building, Housing, and Planning's Community and Economic Development division seeks to continue to implement, evaluate, and enhance programs to promote the expansion of programs and services available to residents. Along with understanding the business community and specific programmatic needs to eventually assist with expansion or retention.

The City will continue its partnership with LMHA, the CoC, and local nonprofits in the area to address homelessness in the community. The City received additional federal funding to provide assistance to those impacted most by the pandemic and are struggling to maintain or find affordable housing.

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

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

The most recent summary of the City of Lorain's past performance in its housing and economic development programs is included in the FY 2021-2022 Consolidated Annual Performance and Evaluation Plan (CAPER).

Activity	Quantity Served
Public Facility Activities	2
Demolition of Blight	18
Homeowner rehabilitation	25
Homelessness prevention	150
Emergency Shelter	48
Community Enhancement Grants	
Job Training	

**Table 1 - FY 2021-2022 Results at a Glance**

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

Summary from citizen participation section of plan.

As a part of the Consolidated Planning process, the City of Lorain must develop an Annual Action Plan that identifies sources of funding, a statement of objectives, a description of projects, graphic distribution, monitoring of sub-recipients, and results of past efforts.

#### **PUBLIC HEARINGS**

To receive public input prior to the adoption of the Annual Action Plan, the City of Lorain shall hold a minimum of two public hearings at the conclusion of a 30-day public comment period as required by HUD.

## **PUBLIC NOTICE**

A public notice shall be published in a local newspaper of general circulation and/or posted in English and Spanish no less than ten days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comments.

The public notice shall include a summary of the proposed Annual Action Plan and all pertinent information regarding where the Annual Action Plan is available for public examination, including the location's address and hours of availability.

## **COMMENT PERIOD**

A 30-day comment period of the draft Annual Action Plan will be available for public review prior to submission to the City of Lorain City Council for final consideration and adoption.

Copies of the draft Annual Action Plan will be available for review at the following locations:

- City of Lorain Main Library, 351 W.6th Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of the draft Annual Action Plan will be available online at [www.cityoflorain.org](http://www.cityoflorain.org).

Once the Annual Action plan has been approved by City Council and submitted to HUD, a 45-day HUD review period will commence.

### **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.

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

### **7. Summary**

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

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
Lead Agency	LORAIN	
CDBG Administrator	LORAIN	Department of Building, Housing and Planning
HOPWA Administrator		
HOME Administrator	LORAIN	Department of Building, Housing and Planning
HOPWA-C Administrator		

**Table 2 – Responsible Agencies**

### **Narrative (optional)**

The City of Lorain's Department of Building, Housing, and Planning is responsible for managing both the CDBG and HOME programs. The Housing Division manages components of CDBG and HOME through down-payment assistance and owner-occupied residential full rehabilitation program. The Community and Economic Development Division manages components of CDBG and CDBG-CV through public facility improvements, public service programming, and eventually economic development activities. The Finance and Compliance Division oversees budgeting, and disbursement of funds, and serves as internal auditors of federal funds to ensure all federal guidelines are followed.

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

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Director

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Lorain, OH 44052

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

### **1. Introduction**

The Department of Building, Housing, and Planning is active with local organizations, as part of the development of the Consolidated Plan, to enhance agency coordination and establish consensus on the needs of special populations, including individuals that are homeless, have special needs, and/or have low incomes. The ongoing conversation occurs with the CoC during the regularly scheduled monthly meetings and is made up of over 130 members of the community.

#### **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 Lorain, more specifically the Department of Building, Housing, and Planning has increased coordination and engagement with our local housing authorities, Lorain Metropolitan Housing Authority (LMHA).

In December 2022, the City of Lorain and Lorain Metropolitan Housing Authority received the Choice Neighborhoods Initiative (CNI) Planning Grant to increase affordable housing and spur and enhance community assets within the designated district with hopes that the Plan will alleviate the impacts of generational poverty and disinvestment in the specific wards. The CNI Plan will take about two years to complete, which will include understanding the needs of the community and compiling data to prepare for implementation.

The City of Lorain continues to be engaged through various committees and groups including but not limited to, the Lorain County Racial Equity Center, Lorain County Active Transportation Committee, FoodForward Lorain, and Lorain County Public Health.

More specifically, the Lorain County Racial Equity Center promotes economic and workforce development and addresses police and criminal justice injustices, and housing shortages among the minority and low-income population. Participants include but are not limited to, members of the Lorain County Board of Mental Health, Lorain County Public Health, and the United Way of Greater Lorain County. The forum provides a space to address racial inequalities and addressing barriers to success.

Additionally, the Department of Building, Housing, and Planning works with Lorain County Public Health to coordinate efforts on lead testing in the homes of applicants applying for the "HOME" Rehabilitation program. The Housing Division also administers CDBG funding to Erie County Health Department for the Healthy Homes Program. This Program allows eligible homeowners and tenants the opportunity to abate lead if the structure was built prior to 1978.

The City of Lorain's continued expansion of community engagement efforts has not only been notable with outcomes but also aligns with the "Goals" outlined in the Consolidated Plan (2020 - 2024).

**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 Lorain attends the monthly Continuum of Care (CoC) meetings to address the ongoing challenges of homelessness and the availability of services and shelters. In April 2021, the City of Lorain was awarded \$1.7 Million of HOME-ARP funding to address the homeless crisis in the community. As of February 2023, the HOME-ARP draft Plan was published for comment and will be submitted to HUD no later than March 1, 2023. The City will utilize the funds for supportive services, the creation of affordable housing, and the rehabilitation of shelters creating non-congregate spaces. As a part of developing the HOME-ARP Plan, there were over 30 consultations conducted to determine the level of need and the gaps in resources or aid of those who are homeless or are at the greatest risk of being homeless which include victims of domestic violence, assault, or have been trafficked. The Department of Building, Housing, and Planning will continue to be active participant in the CoC to support and assist the most vulnerable populations.

**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 Lorain does not receive or administer an Emergency Shelter Grant (ESG). The City of Lorain is and will remain involved with the Continuum of Care (CoC), which includes the Lorain County Homeless Task Force. The Lorain County Homeless Task Force CoC area assists in the operation and administration of the region's Homeless Management Information System (HMIS).

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 3 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	City of Lorain, Fair Housing Board
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing 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>	City staff meets with the City of Lorain Fair Housing Board monthly to address any Fair Housing complaints and also future affordable housing plans in the City of Lorain.
2	<b>Agency/Group/Organization</b>	Lorain Metropolitan Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Lorain meets regularly with the Director of LMHA monthly to discuss the Choice Neighborhoods Grant Planning process.

3	<b>Agency/Group/Organization</b>	United Way of Greater Lorain County
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth 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>	United Way of Greater Lorain County is the organization that employs the Continuum of Care Coordinator for the County. This role coordinates the monthly CoC meetings that BHP staff attend, works closely with BHP staff in the creation of the HOME-ARP plan, and provides knowledge and education about the homeless needs in the community which serves as a guide for where funding is needed.

4	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Legal Aid Society of Cleveland  Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Service-Fair Housing
	<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>	BHP works with members of the Legal Aid Society of Cleveland to coordinate efforts that provide services to underserved residents in the City of Lorain. BHP and Legal Aid are working together to implement a plan that streamlines the process from resident complaints to justice served when they find themselves on the wrong side of an eviction or are living in unsatisfactory conditions.
5	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b> <b>What section of the Plan was addressed by Consultation?</b> <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	EL CENTRO DE SERVICIOS SOCIALES, INC.  Housing Neighborhood Organization  Housing Need Assessment  BHP works with the members of El Centro to assist residents with Spanish-speaking interpretation, and down payment assistance programs for first-time homebuyers and BHP staff recently became a member of the El Centro Finance Committee to assist members of the community with understanding the importance of taking care of their finances.

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

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	United Way of Greater Lorain County	The CoC, under the United Way of Greater Lorain County, has been an extremely valuable asset to the community since its inception in 2018. BHP is working closely with the CoC Coordinator to produce a HOME-ARP plan that will serve the most vulnerable residents in the City.

**Table 4 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## AP-12 Participation – 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 Lorain follows its Citizen Participation Plan. We are required to have 2 public meetings prior to submitting our AAP to HUD.

### 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)
2	Notice of Plan Availability on City Website	Non-English Speaking - Specify other language: Spanish		0	0	<a href="http://www.cityoflorain.org">www.cityoflorain.org</a>
4	Newspaper Ad	Non-English Speaking - Specify other language: Spanish	0	0	0	

Table 5 – Citizen Participation Outreach

## Expected Resources

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

#### Introduction

The City of Lorain was allocated \$1,344,334.00 in Block Grant funds and \$628,402.00 in HOME funds. The City also expects to sell some land in an industrial area to businesses. This land sale will create additional program income and allow the City to do more projects benefitting the low-to-moderate-income citizens of Lorain and will create job opportunities within Lorain.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder 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	1,344,334	164,400	2,689,357	4,198,091	1,500,000	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	628,402	60,000	3,500,000	4,188,402	610,000	
Other	public - federal	Admin and Planning Economic Development Public Improvements Public Services	0	0	0	0	0	
Other	public - federal	Other	0	0	0	0	0	

Table 6 - Expected Resources – Priority Table

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

The City of Lorain does not have a matching requirement with HOME funds. This requirement has been waived 100% due to the City being classified as being in fiscal distress.

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

The City of Lorain is actively working towards utilizing vacant land owned by the City to address the Housing and Homelessness needs. A plan to build affordable housing for seniors is in the works and will hopefully begin the process of qualifying a developer in 2023 for this project.

**Discussion**

The City of Lorain is working diligently to spend prior-year funding as quickly as possible as well as looking at how we can best utilize and quickly spend the new allocation.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing	2020	2024	Affordable Housing Public Housing	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI	Affordable and Accessible Housing for Special Need Fair Housing Education and Outreach Housing Rehabilitation/Weatherization Increased Homeownership Opportunities Housing Counseling	CDBG: \$500,000 HOME: \$619,562	Homeowner Housing Rehabilitated: 32 Household Housing Unit Direct Financial Assistance to Homebuyers: 15 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Homelessness	2020	2024	Homeless	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI	Affordable and Accessible Housing for Special Need Homeless Services and Prevention Programs and services for low and moderate income Programs and services for special needs residents Youth Programs and Services Senior Programs and Services		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted Homelessness Prevention: 50 Persons Assisted Housing for Homeless added: 2 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Community and Economic Development	2020	2024	Non-Housing Community Development	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI	Homeless Services and Prevention Programs and services for low and moderate income Programs and services for special needs residents Public Facilities and Infrastructure Social Service Programs Youth Programs and Services Senior Programs and Services Legal Services	CDBG: \$581,987	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 43770 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
4	Non-Homeless Special Needs	2020	2024	Non-Homeless Special Needs	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI	Affordable and Accessible Housing for Special Need Homeless Services and Prevention Housing Rehabilitation/Weatherization Programs and services for low and moderate income Programs and services for special needs residents Public Transportation Social Service Programs Lead Assessment and Abatement	CDBG: \$125,000	Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 10 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Program Administration	2020	2024	Administration/Planning		Program Administration	CDBG: \$301,747 HOME: \$68,840	Other: 1 Other

Table 7 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Housing
	<b>Goal Description</b>	The City will provide CDBG and HOME funding to income eligible residents, homebuyers, and homeowners. The City continues to increase the number of homeowners served under the Home Repair Program that provides roof and gutter replacement, and will expand this program to provide assistance to more homeowners needing repairs under \$4,999 per household with CDBG funds. There will be new micro-programs under the Housing repair umbrella to assist even more qualified homeowners. The City will continue to provide the full rehabilitation program to qualified homeowners with HOME dollars along with the HOME Down Payment Assistance Program to help make new homebuying affordable.
2	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	This goal addresses enhancing the continuum from shelter to permanent housing for persons who are homeless. The City received \$1.7 million dollars of HOME-ARP funding that will be allocated to three different activities of the four allowed. Funding will support the development of non-congregate shelter, the acquisition/development of affordable housing, and fund supportive services. Funding will be made available through an application process separate for all three activities to ensure proper policies and procedures are being followed.
3	<b>Goal Name</b>	Community and Economic Development
	<b>Goal Description</b>	Public Facility Improvements and Public Service Programming

<b>4</b>	<b>Goal Name</b>	Non-Homeless Special Needs
	<b>Goal Description</b>	The subpopulations under special needs includes elderly, frail elderly, severe mental illness, developmentally disabled, physically disabled, persons with alcohol/other drug addictions, persons with HIV/AIDS, victims of domestic violence and other subpopulations of the special population. It is anticipated that this population will have housing and services needs addressed through the HOME-ARP plan once it is reviewed and approved by HUD. Policies and procedures will be created for each qualifying activity that will provide guidance on how activities will be funded.
<b>6</b>	<b>Goal Name</b>	Program Administration
	<b>Goal Description</b>	

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

An Annual Action Plan (AAP) is required each year of the Five-Year Consolidated Plan (ConPlan). This AAP covers January 1 through December 31, 2023, and is the fourth year of the City's 2020-2025 ConPlan. The AAP implements strategies outlined in the ConPlan by addressing the housing needs of very low, low-, and moderate-income citizens of Lorain. The APP enables investors, nonprofit organizations, program administrators, elected officials, and concerned citizens to work with the City to assist existing homeowners and develop affordable housing, and community development programs. The City will also utilize the \$1.7 million of HOME-ARP to fund activities that will serve the homeless, at-risk of homeless, domestic violence and sexual assault survivors, and those living in extreme poverty where housing is unstable.

In FY 2023, the City of Lorain anticipates a budget for housing and community development of over \$1 million from federal sources. This funding will assist in preserving the existing programs that support homeowner rehabilitation, financial literacy, and first-time homebuyer counseling, health homes lead abatement, and senior homeowner repair. Funding will also be provided to the Lorain Metropolitan Housing Authority (LMHA) to assist with much-needed repairs at one of the existing senior properties managed by LMHA.

#### Projects

#	Project Name
1	CDBG Administration
2	Public Service
3	Street Improvements
4	Public Facility Improvements
5	SB Clearance & Demolition
6	Home Repair Program
7	Public Housing Modernization
8	HOME Admin
9	CHDO
10	HOME Rehabilitation Loan Program
11	Down Payment Assistance Program

Table 8 - Project Information

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

All allocation priorities support the overall priorities of the Consolidated Plan and address under-served needs through owner-occupied home rehabilitation, homeless services and housing support, and collaboration with non-profit organizations. The main obstacle in addressing underserved needs is that the funding available can't support all of the needs of the community.

## **AP-38 Project Summary**

### **Project Summary Information**

<b>1</b>	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$301,747
	<b>Description</b>	Admin costs (salaries/fringes, advertising, supplies, etc.) to administer the CDBG program.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a
	<b>Location Description</b>	n/a
<b>2</b>	<b>Planned Activities</b>	Admin costs (salaries/fringes, advertising, supplies, etc.) to administer the CDBG program.
	<b>Project Name</b>	Public Service
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Community and Economic Development
	<b>Needs Addressed</b>	Affordable and Accessible Housing for Special Need Homeless Services and Prevention Fair Housing Education and Outreach Youth Programs and Services Programs and services for low and moderate income Public Transportation Social Service Programs Programs and services for special needs residents Senior Programs and Services Housing Counseling Legal Services
	<b>Funding</b>	CDBG: \$125,000
	<b>Description</b>	open applications for public service projects
	<b>Target Date</b>	12/31/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	various locations. the goal is to approve projects for 4 organizations that benefit LMI persons and 1 organization that will provide LMI Housing benefits.
	<b>Planned Activities</b>	tbd
<b>3</b>	<b>Project Name</b>	Street Improvements
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Community and Economic Development
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$261,987
	<b>Description</b>	Street improvements to residential streets in LMI areas
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	tbd
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	Street improvements to residential streets in LMI areas
<b>4</b>	<b>Project Name</b>	Public Facility Improvements
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Community and Economic Development
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$120,000
	<b>Description</b>	open applications for a neighborhood facility improvement project and/or street improvements

	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	tbd
	<b>Location Description</b>	LMI areas
	<b>Planned Activities</b>	tbd
5	<b>Project Name</b>	SB Clearance & Demolition
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Community and Economic Development
	<b>Needs Addressed</b>	Elimination of Slum and Blight
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	demolition of slum/blighted properties
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	tbd
	<b>Location Description</b>	various location in LMI areas
	<b>Planned Activities</b>	clearance and demolition of properties deemed to be slum/blighted in LMI areas
6	<b>Project Name</b>	Home Repair Program
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Housing Rehabilitation/Weatherization
	<b>Funding</b>	CDBG: \$400,000

	<b>Description</b>	Home repair program to offer zero percent interest deferred loans to low and moderate-income households to repair or replace major components to their owner-occupied home. Depending on income, the loans may or may not have a 20% repayment.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	32 LMI households
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	Major and minor repair to owner-occupied households that may include roof and gutters, or other repairs determined necessary to assist homeowners with major interior or exterior repairs to their home. Minor repair program to assist home-owners with minor repairs to the interior or exterior of their home.
7	<b>Project Name</b>	Public Housing Modernization
	<b>Target Area</b>	Ward 5 LMI
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Housing Rehabilitation/Weatherization
	<b>Funding</b>	CDBG: \$100,884
	<b>Description</b>	Rehabilitation of housing units owned/operated by the Lorain Metropolitan Housing Authority (LMHA)
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	60 LMI households
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	Rehabilitation of housing units owned/operated by the Lorain Metropolitan Housing Authority (LMHA)
8	<b>Project Name</b>	HOME Admin
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Program Administration

	<b>Funding</b>	HOME: \$68,840
	<b>Description</b>	costs associated to administering the 2023 HOME program
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a
	<b>Location Description</b>	n/a
	<b>Planned Activities</b>	costs associated to administering the 2023 HOME program
9	<b>Project Name</b>	CHDO
	<b>Target Area</b>	Ward 5 LMI
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Increased Homeownership Opportunities
	<b>Funding</b>	HOME: \$94,260
	<b>Description</b>	Community Housing Development Organization (CHDO) 15% set aside requirement for the development of affordable housing
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	tbd
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	Community Housing Development Organization (CHDO) 15% set aside requirement for the development of affordable housing
10	<b>Project Name</b>	HOME Rehabilitation Loan Program
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Housing Rehabilitation/Weatherization
	<b>Funding</b>	HOME: \$262,651

	<b>Description</b>	to provide zero interest loans to low income households to fully rehabilitate their owner occupied home
	<b>Target Date</b>	12/31/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 low income households
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	to provide zero interest loans to low income households to fully rehabilitate their owner occupied home
11	<b>Project Name</b>	Down Payment Assistance Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Increased Homeownership Opportunities
	<b>Funding</b>	HOME: \$262,651
	<b>Description</b>	To provide down payment assistance to low income households to purchase their first home in the City of Lorain
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 low income households
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	To provide down payment assistance to low income households to purchase their first home in the City of Lorain

## **AP-50 Geographic Distribution – 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 geographic areas of the entitlement are Citywide with a concentration in four of the eight wards in the City. The Wards of priority include Wards 2, 3, 5, and 6 which have the highest concentration of low-income and underserved residents.

#### **Geographic Distribution**

Target Area	Percentage of Funds
Ward 2 LMI	20
Ward 5 LMI	22
Ward 6 LMI	15
Ward 3 LMI	16

**Table 9 - Geographic Distribution**

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

In recent years, a greater percentage of federal funding (CDBG) has been allocated to homeowner rehabilitation and park improvements. The Citywide designation supports the entire City as some residents from all wards benefit from programs offered through the City due to qualifications under income guidelines and policies and procedures in place for those programs.

#### **Discussion**

The City of Lorain has been successful in the implementation of new park equipment and major improvement projects funded through CDBG. New efforts are now concentrated on building on the programs currently in place and expanding the economic development division of the City to incorporate federal funding with private investment and additional leverage dollars to enhance development in the City overall.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Lorain places a high priority on maintaining and supporting homeownership in the City. The Department of Building, Housing, and Planning (BHP) is increasing its goals to implement new programs that will support current homeowners with maintaining their homes and assist prospective homeowners with funding to purchase a home in the City. The City of Lorain also anticipates the development of Permanent Supportive Housing that will bring 62 single adult units to be built in 2023.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	62
Non-Homeless	65
Special-Needs	0
Total	127

**Table 10 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	30
The Production of New Units	64
Rehab of Existing Units	10
Acquisition of Existing Units	0
Total	104

**Table 11 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

Over the past three decades, Lorain has experienced a major housing crisis in the City. About 20% of the existing homes were built prior to 1928 and 44% of the entire housing stock in Lorain is a rental. The City anticipates future partnerships with developers to bring more affordable housing to the area with an emphasis on homeownership and permanent housing.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Lorain Metropolitan Housing Authority (LMHA) is the housing authority for Lorain County. Within the City of Lorain, LMHA maintains and operates 862 public housing units. LMHA's mission is to provide safe, decent, affordable housing for persons of low income in Lorain County. LMHA provides 1,438 public housing units throughout the entire County, with 3,156 sections 8 vouchers including 117 Veterans Affairs Supportive Housing (VASH) vouchers. There are 46 Emergency Housing Vouchers and 78 project-based vouchers.

Individuals interested in applying are encouraged to submit applications in person, or online. Public housing waiting lists and wait times for public housing are pending the rate of turnover and vary based on family size and need. Currently, the typical Lorain County family will wait between three months to 2 years.

Residents of public housing and Housing Choice Vouchers can participate in the JUMP START program that assists residents with employment and self-goals.

### **Actions planned during the next year to address the needs to public housing**

LMHA will receive funding through Lorain's CDBG program to assist with repairs at one of the project-based section 8 properties that have experienced depreciation over the years.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

LMHA promotes several resident initiatives by providing training programs for family self-sufficiency (FSS) through educational entities or private sector companies that provide training. LMHA has an economic empowerment plan that includes workshops with banks and small business seminars for the residents. LMHA plans to offer resident training on HUD regulations through a tenant council. This activity broadens public housing residents' knowledge of their rights, knowledge, HUD's perspective on issues, and various resident initiatives that can be explored and implemented at various points in time.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The local PHA, Lorain Metropolitan Housing Authority, is not designated as troubled.

### **Discussion**

The City and LMHA submitted an application for the Choice Neighborhoods Planning Grant to fund the rehabilitation and revitalization of an area in Lorain that includes the current public housing complex that is in need of major upgrades. The team was awarded a grant from HUD to implement a 2-year plan for the redevelopment of areas in the 5th and 6th wards.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City of Lorain outlines the one-year goal and the specific action steps it will take in Fiscal Year 2023 to carry out the homeless strategy identified in the 2020 - 2024 Consolidated Plan and specifically the Strategic Plan section and guided by the 2020 Cleveland State University Housing Assessment (Study) and 2021 Homeless System Strategic Plan for Lorain County. Additionally, this section addresses any activities related to the supportive housing needs of non-homeless populations. The City will continue to foster inter-agency coordination with public service agencies in our community to address the homeless and other special needs.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City of Lorain prioritizes working more with the County Continuum of Care Coordinators and Committee Meetings to address the homeless. The Committee consists of housing and service providers, city and county governments, and agency representatives. The Goal of the Committee is to establish a cooperative effort leading to the development of a continuum of housing and services for homeless persons. In 2021, the City of Lorain was awarded \$1.7 Million in Home-ARP Funding for affordable housing, TBRA, supportive services, and the creation of non-congregate shelter(s). The Housing Team is working closely with the CoC Coordinator to prepare the HOME-ARP allocation plan for the expenditure of the funds. The City of Lorain will continue to foster a relationship with the Homeless Task Force and Neighborhood Alliance and other community partners, in order to keep the residents and community leaders informed of measures for assisting the homeless within the city. The City of Lorain encourages local groups to apply for Public Service funds to increase programmatic reach. The City of Lorain will continue to expand our list of non-profit organizations and community partners serving this population.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Lorain continues to foster our relationship with various organizations providing emergency and transitional housing services throughout the City of Lorain. A primary resource is Neighborhood Alliance's Haven Center. The Haven Center is a 24-7 emergency shelter for men, women, and children. Currently, the facility offers 68 beds and has plans to expand the existing facility. The Facility offers employment referrals, vocational rehabilitation, GED courses, tickets for public transit, and assistance with applying for affordable housing.

#### **Helping homeless persons (especially chronically homeless individuals and families, families**

**with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City of Lorain will utilize the HOME-ARP funding to provide housing, shelter, and supportive services to the qualifying population that is identified as homeless, at risk of homelessness, survivors of domestic violence, dating violence, sexual assault, and trafficking, and other individuals and households at greatest risk of housing instability. Upon HUD approval of the HOME-ARP plan, the City will provide a notice of funding opportunity (NOFO).

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The non-homeless special needs populations include the elderly, mentally ill, developmentally disabled, physically disabled, substance abusers, and persons with AIDS or related diseases. The City of Lorain and other non-profits continuously provide various types of assistance, primarily through supportive services, to persons with special needs in the community. These agencies include but are not limited to Neighborhood Alliance; Catholic Charities; Second Harvest Food Bank; Lorain County Urban League; and El Centro De Servicios Sociales to name a few. The City will continue to reduce homelessness by supporting non-profit service providers that offer self-sufficiency training, medical care, workforce development, mental health counseling, case management, education services, and other activities to prevent homelessness. Additionally, this will be supported through various other homeownership assistance programs such as down payment assistance and financial literacy.

## **Discussion**

The City of Lorain will continue to offer assistance, advice, and coordination with the community agencies that provide day facilities, case management, workforce development, vocational tools, and other homeless services. The City of Lorain plans to award various non-profit agencies with available public service funding to provide services such as workforce development, youth services, legal services, and other programming and services that may provide supportive services to the homeless and non-homeless special needs populations.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The City of Lorain is committed to affirmatively furthering fair housing and overcoming identified barriers to affordable housing. These efforts have resulted in the enhancement of the Fair Housing Board, the development of specific goals and objectives to overcome barriers to affordable housing, and support for projects that counter the negative effects of public policies.

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

The City of Lorain utilizes many strategies to remove barriers to affordable housing. The City will implement the Down Payment Assistance Program to assist first-time homebuyers. Additionally, the City recently updated the Zoning and Land Use code which removed previous barriers to development. The City of Lorain adopted the Ohio Board of Building Standards recommendation of the Ohio Building Codes (OBC), Ohio Mechanical Codes (OMC), Ohio Plumbing Codes (OPC), and the ICC International Building Code. These codes are designed to set forth minimum standards for health, safety, and welfare. The City of Lorain is working directly with private developers and non-profit housing developers to increase the amount of affordable housing.

Rental Registration is required by all landlords and is designed to protect renters from absentee and unresponsive landlords. By requiring a local contact for a point of service, the legal authority of the City of Lorain has increased the power to keep landlords complying with fair housing laws and the need to provide a safe and sanitary environment. Partial ordinance copied below:

Per City of Lorain Codified Ordinance No. 92.21

- Rental Housing Licenses are valid for one year from the issuance date, or whenever ownership changes. Licenses are non-transferable.
- The owner of a rental dwelling unit who does not reside in The City of Lorain shall designate an agent who in addition to the owner shall be responsible for the operation of the Rental Dwelling Unit and who may accept service of process and official notices issued by The City of Lorain on behalf of the owner.
- An official notice or service of process issued to a designated agent shall be deemed as served or delivered upon the owner of a record of the rental dwelling unit. Failure to maintain a rental dwelling unit or to maintain any requirements regarding licensure shall be grounds for revocation of an existing Housing License or denial or issuance of a Housing License. A designated agent shall be an individual person who resides in The City of Lorain, shall provide a valid address within the City, and promptly notify The Chief Building Official of any change in

address or other change in status.

**Discussion:**

The key point of this section is that the City of Lorain has made and continues to make conscious efforts to update the Building Code, Zoning Code, Land Use, CRA, and other local provisions. The City of Lorain's improvements will make the City more attractive for housing and development.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City of Lorain continues to place a high priority on Fair Housing. Seven members make up the Fair Housing Board that will undergo training and support to ensure residents are aware of their rights under Fair Housing and to utilize the system put in place to assist them in the fight against discrimination.

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

The City will address the obstacles to meeting the needs of the underserved by fostering deeper relationships with nonprofits and community members to provide an opportunity for funding through an application process. Additional funding through HOME-ARP will directly address the needs of the underserved through supportive services, housing, and the creation of non-congregate shelters.

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

The City encourages development in the City through a vacant land program and funding opportunities for qualified developments. The City continues to work with organizations that desire to bring affordable housing to the area.

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

The City provides funding to the Erie County Healthy Homes Program that abates lead hazards in the homes of owners and tenants. Priority is placed on homes where children under 6 years of age live.

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

The City of Lorain continues and plans to provide resources such as housing, financial literacy, housing counseling, workforce development, youth programming, and other public services to promote self-sufficiency. By providing and expanding these resources the City of Lorain will continue to work with partner agencies to assist families that fall within the poverty guidelines.

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

Because many of the clients served through the local City programs are also assisted by other social service agencies, the City maintains a good network of communication and referral with these other entities. Staff from the local partners frequently refer clients to one another in order to best meet the needs of the citizen or household. The City of Lorain more specifically the Department of Building, Housing, and Planning staff continues to serve on the Continuum of Care in order to assess the homeless needs of Lorain County and collaborate on homeless programs.

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

The local nonprofit organizations in Lorain, such as El Centro de Servicios Sociales, Lorain Metropolitan Housing Authority, United Way, Lorain County Goodwill, Lorain County Habitat for Humanity, Lorain County Community Action Agency, the Lorain County Urban League, Big Brothers Big Sisters, and Neighborhood Alliance provide a number of affordable housing and supportive services. These organizations typically have a specific target population that they serve, and accordingly, possess a level of knowledge and expertise that is invaluable. The continuation and expansion of such services by aggressively seeking additional funding will be encouraged over the next year. In addition, better coordination between these agencies and with the public and private sector organizations will continue to be a high priority.

The City of Lorain has prioritized creating and fostering relationships with these organizations and agencies by working closely with the County's new Continuum of Care Coordinator and attending monthly CoC meetings.

### **Discussion:**

The City of Lorain is committed to assisting individuals and families by providing services and resources to mitigate poverty-related barriers.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

#### Introduction:

The City of Lorain utilizes CDBG funding to benefit low to moderate income residents of the City of Lorain and also utilizes HOME funding to benefit low income residents with housing.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(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	164,400
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>164,400</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.	75.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Currently the City of Lorain has CDBG funds available to assist homeowners with minor home repairs.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture is the regulatory requirement under which all or a portion of the direct HOME subsidy must be repaid to the City if the property is sold during the affordability period.

The City has elected Recapture rather than Resale restrictions and has adopted the “reduction during affordability period” method permitted by 92.254(a)(5)(ii)(A)(2). Upon the completion of the affordability period, the City will reduce the amount of recapture by an equal amount (20% of the original loan amount) each year during the affordability period.

Example: If the number of HOME funds invested is \$10,000 and the homebuyer sells the property at the end of year 3, \$6,000 will be reduced from the original investment and only \$4,000 will need to be repaid.

The recapture amount is limited to the number of net proceeds of the sale, which is defined as the sale price less the balance due on superior secured debt and closing costs incurred by the Homebuyer at sale or transfer.

If there are no net proceeds of sale or the net proceeds are insufficient to repay the Recapture Amount, then the entire net proceeds, if any, will be recaptured and retained by City to satisfy both this Agreement and the Loan. In the event the net proceeds are less than the outstanding loan balance, the City reserves the right to determine whether the sales price is comparable to the sales price in an arms-length transaction for a similar unit and to evaluate the closing cost being charged to the Homebuyer to ensure they are reasonable and customary.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City of Lorain does not have plans to purchase units with HOME funds in the year 2023.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

With our current programs, the City of Lorain does not have plans to refinance existing debt secured

by multifamily housing.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

## Attachments

## Citizen Participation Comments

### City of Lorain

#### 2020/2024 Consolidated Plan Citizen Participation Plan

The City of Lorain recognizes that citizen participation is a very important part of the consolidated planning process. To better guide the City's outreach in gaining citizen input, the City has developed a Citizen Participation Plan. The City of Lorain Citizen Participation Plan is designed to create opportunities for citizens to be involved in the development of the consolidated plan, annual action plans, the implementation of substantial amendments, and annual performance reporting.

#### Introduction

In accordance with 24 CFR Section 91.105, the City of Lorain Department of Building, Housing, and Planning has prepared a Citizen Participation Plan to explain what opportunities are available to all residents, in addition, to how the public can participate in the process of preparing the city's Consolidated Plan. The City of Lorain Department of Building, Housing, and Planning is responsible for administering the Citizen Participation Plan.

The overall goal of the Consolidated Plan is to utilize federal, state and local funding in a coordinated manner to promote the development of viable communities. Viable communities are described as meeting the residents' needs in regards to affordable and decent housing; a safe and suitable living environment; and adequate economic opportunities particularly for low- and moderate-income persons.

Citizen participation will be encouraged during the development of the consolidated plan, annual action plans, any substantial amendments, and the performance report by providing notice to residents and local organizations through various media methods. The Citizen Participation Plan sets forth the policies to be used for citizen participation and outlines the procedures used to encourage the participation of all residents of the City of Lorain – especially low-income residents, minorities, non-English speaking residents, the disabled and persons with HIV/AIDS.

\*Updated 12/02/2022

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## **Five-Year Consolidated Plan**

### ***Public Hearings***

In accordance with 24 CFR Section 91.105, the City of Lorain will host, at a minimum, two public hearings during the development of the Consolidated Plan, prior to its proposed adoption by City Council for submission to HUD.

### ***Public Notice***

The City will publish a notice of availability of the Consolidated Plan and corresponding Annual Action Plan for public review in a newspaper of general circulation and in any widely disseminated smaller publications or posting serving low-income residents, minorities, non-English speaking residents, the disabled and persons with HIV/AIDS. The date of publication will be the beginning of a 30-day public comment period at the end of which a public hearing on the Consolidated Plan and corresponding Annual Action will also be held.

The notice of availability shall include a summary of the Consolidated Plan as well as a summary of those sections of the Consolidated Plan that concern CDBG and HOME funds. The summary will describe the contents and purpose of the Consolidated Plan, and will include a list of locations where copies of the entire Consolidated Plan may be examined.

### ***Comment Period***

Prior to the City Council approval of the Consolidated Plan, a 30-day public comment period shall be held as required by HUD.

The City shall publish a draft of the Consolidated Plan (including the corresponding Annual Action Plan) to be available during the 30 day comment period so that citizens have an opportunity to review the Consolidated Plan prior to adoption.

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During the 30-day comment period, the Department of Building, Housing, and Planning will receive written comments on the Consolidated Plan from the public and will later include those comments and the City's responses in the final publication of the Consolidated Plan.

Copies of the draft Consolidated Plan will be available for review at the following locations:

- City of Lorain Main Library, 351 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain, OH 44052

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of the draft Consolidated Plan will be made available online at [www.cityoflorain.org](http://www.cityoflorain.org).

The City of Lorain City Council, as the elected authority of the citizens of the City of Lorain, is responsible for the Consolidated Plan. All public comments shall be reviewed and taken into consideration by the Council. The City Council authorizes final publication of the Consolidated Plan and Annual Action Plan and submission of the Consolidated Plan and Annual Action Plan to HUD.

#### **Submission of the Plan**

Following approval by the City Council, the Consolidated Plan will be submitted to HUD no later than 60 days after the annual allocations are announced. Upon submission, all certifications of compliance will be included.

#### **Annual Action Plan**

Each program year, as a part of the consolidated planning process, the City of Lorain must develop an Annual Action Plan that identifies sources of funding, statement of

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objectives, description of projects, graphic distribution, monitoring of sub-recipients, and results of past efforts.

#### ***Public Hearings***

To receive public input prior to the adoption of the Annual Action Plan, the City of Lorain shall hold a minimum of two public hearings at the conclusion of a 30-day public comment period as required by HUD. Due to the ongoing COVID-19 Pandemic, HUD recognizes the need to limit public gatherings and therefore is allowing public hearings to be held virtually through August 16, 2021.

#### ***Public Notice***

A public notice shall be published in a local newspaper of general circulation and/or posted in English and Spanish no less than ten days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

The public notice shall include a summary of the proposed Annual Action Plan and all pertinent information as to where the Annual Action Plan is available for public examination, including the locations address and hours of availability.

#### ***Comment Period***

A 30 day comment period of the draft Annual Action Plan will be established for public review prior to submission to the City of Lorain City Council for final consideration and adoption.

Copies of the draft Annual Action Plan will be available for review at the following locations:

- City of Lorain Main Library, 351 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain, OH 44052

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Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of the draft Annual Action Plan will be made available online at [www.cityofflorain.org](http://www.cityofflorain.org).

Once the Annual Action plan has been approved by City Council and submitted to HUD, a 45 day HUD review period will commence.

### **Substantial Amendments**

If there are changes because of legislative authority or the Department of Housing and Urban Development (HUD) causes changes in rules, regulations and guidelines which impact the Community Development Block Grant Program, said changes will supersede any/all of the provisions contained in this Citizen Participation Plan. In addition, any general or substantial amendment to any portion of the Consolidated Plan will follow HUD prescribed notice and comment period requirements.

Prior to the submission of any substantial change in the proposed use of funds, citizens will have reasonable notice of, and the opportunity to comment on, the proposed amendment using the citizen participation methods outlined in this Citizen Participation Plan and/or other methods that result in effective notice and comment. Substantial amendments may be made up to six (6) times per program year.

The following actions necessitate a substantial amendment to the Consolidated Plan and/or Annual Action Plan:

- The elimination or addition of an activity originally described in the Annual Action Plan and/or Consolidated Plan.
- A change in the purpose of an activity originally described in the Annual Action Plan and/or Consolidated Plan, such as a change in the type of activity or its ultimate objective (i.e., a change in a construction project from housing to commercial).

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- A meaningful change in the location of an activity originally described in the Annual Action Plan and /or Consolidated Plan.
- A change that increases or decreases funding or the cost of an activity, project or program by more than 25 percent of the funds that were originally allocated for that activity, project or program originally described in the Annual Action Plan. This does not include activities, projects or programs that are completed under budget by more than 50 percent. In such case, the unspent balance may go to existing or previously approved activities.
- A change required by Federal law or regulation.

#### ***Public Hearings***

The City shall hold a minimum of one public hearing for public input on any Substantial Amendment. Prior to amending its Consolidated Plan for a new activity or a substantial change, the City will publish a notice of the substantial change in area newspapers. The public notice shall be published in a local newspaper of general circulation no less than ten days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

#### ***Comment Period***

The public shall be given an opportunity to comment on any Substantial Amendments made to the City's Consolidated Plan or Annual Action Plan. After proper notice is given, a 30 day public review period will be required in order to obtain public comment prior to submission to HUD.

The public comment period for the HOME-ARP Allocation Plan as part of any Substantial Amendment shall be at least 15 calendar days.

Copies of draft Substantial Amendments will be available for review at the following locations:

- City of Lorain Main Library, 351 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055

\*Updated 12/02/2022

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- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain, OH 44052

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of draft Substantial Amendments will be made available online at [www.cityoflorain.org](http://www.cityoflorain.org).

### **COVID - 19**

Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, HTF, HOPWA or ESG funds.

#### ***Public Hearings***

To receive public input prior to the adoption of the Annual Action Plan or a Substantial Amendment, the City of Lorain shall hold a minimum of one public hearing at the conclusion of a 5-day public comment period as required by HUD.

#### ***Public Notice***

A public notice shall be published on the City of Lorain's website, facebook, and the Lorain County website no less than five days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

Due to the "State of Emergency", all public hearings will be virtual. The Virtual Public Hearing will be live - streamed via Youtube (Lorain TV20) and Spectrum Cable Channel 1025. To participate and ask questions please call 440-204-2590.

The public notice shall include a summary of the proposed Annual Action Plan and/or Substantial Amendment and all pertinent information as to where the Annual Action Plan or Substantial Amendment is available for public examination, including the locations address and hours of availability.

<sup>1</sup>Updated 12/02/2022

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#### ***Comment Period***

A 5 day comment period of the draft Annual Action Plan or Substantial Amendment will be established for public review prior to submission to HUD for approval.

Copies of the draft Annual Action Plan or Substantial Amendment will be available for review on the City of Lorain's website.

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups.

Once the Annual Action plan has been submitted to HUD, a 45 day HUD review period will commence.

#### **Performance Reports**

Each year the City will issue a Performance Report showing the progress it has made in carrying out its Strategic Plan and its Annual Action Plan.

The Performance Report, or the Consolidated Annual Performance and Evaluation Report (CAPER), will include a description of the resources available, the investment of those resources, where those resources were spent geographically, persons assisted (including the racial and ethnic status of persons assisted), actions taken to further fair housing, and other actions indicated in the Strategic Plan and the Annual Action Plan. The City must send HUD a CAPER by March 30th or within 90 days of the close of the program year. The City of Lorain's program year begins on January 1 and ends on December 31.

#### ***Public Hearings***

The City will hold a minimum of one public hearing to consider any comments or views of citizens in relation to the published Performance Report. Due to the ongoing COVID-19 Pandemic, HUD recognizes the need to limit public gatherings and therefore is

\*Updated 22/02/2022

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allowing public hearings to be held virtually through August 16, 2021. A public notice shall be published in a local newspaper no less than ten days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

#### ***Comment Period***

The City will receive comments and make all Performance Reports available to the public at least 15 days prior to submission to HUD. The City will consider any comments or views of citizens received in writing or orally at public hearings in preparing the final version of Performance Reports.

A summary of these comments will be attached to the Performance Report, upon completion of the final version to be submitted to HUD. HUD conducts a 30 day review of the Performance Report after submission.

Copies of the draft CAPER Plan will be available for review at the following locations:

- City of Lorain Main Library, 351 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain, OH 44052

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of the draft CAPER Plan will be made available online at [www.cityoflorain.org](http://www.cityoflorain.org).

#### **Complaints/Comments/Grievances**

The City will provide a timely and substantive response to all written complaints. Upon receipt of a written comment, the City will prepare and forward a written response (including clarification and/or corrective action as needed) and any other related documents will remain on file in the City of Lorain Department of Building, Housing, and Planning. All written complaints/comments should be addressed to City of Lorain Department of Building, Housing, and Planning, 200 W. Erie Avenue, 5<sup>th</sup> Floor, Lorain, OH 44052.

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### **Public Hearings/Public Notices**

The City of Lorain will host, at a minimum, two public hearings annually during the Five-Year Consolidated Plan's term. The first public hearing will announce the availability of technical assistance and funding for current program year. A second public hearing will be held later in the program year, once the draft plan is ready for public review, to solicit comments on the strategies and proposed use of funds and to review program performance. Public hearings will be conveniently scheduled and located for people who will benefit from program funds, and will be accessible to persons with special needs.

Under circumstances where an in-person public hearing is not viable, virtual meetings will be held. These virtual public hearings will follow the same structure as an in-person public hearing. Virtual hearings will be held using an accessible software.

The City of Lorain is required to provide adequate advance notice of public hearings. There shall be advance public notice once a federally required document is available for public review, such as the proposed Annual Action Plan, Five-Year Consolidated Plan, any proposed Substantial Amendment to the Annual Action Plan or Five-Year Consolidated Plan, and the Annual Performance Report. In addition, there shall be advance public notice of all public hearings, and public meetings related to the funds or planning process covered by this Citizen Participation Plan.

A translator will be provided based on prior written request of an individual or organization representing non-English speaking persons. Written requests must be made to the City of Lorain Department of Building, Housing, and Planning, a minimum of five business days prior to hearing dates.

To ensure that adequate advance notice of public hearings is provided to citizens or other interested parties, the City will take the following actions:

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- The City will publish a notice of public hearing in one or more newspapers of general circulation ten days prior to the day of the public hearing, to allow interested parties to attend.
- Notices will be printed in readable size and placed in the general section of the newspaper. The notices will provide complete summary information on the purpose of the meeting, the date, time, and location. They shall provide a name and telephone number for persons who may have questions about the meeting / hearing, along with information regarding accessibility for the disabled.
- This information will also be disseminated at appropriate City libraries, government offices and public spaces. If public spaces are unavailable, information will always be available on the City of Lorain's website ([cityoflorain.org](http://cityoflorain.org)) and at City Hall.

### **Access to Information**

Citizens, public agencies and other interested parties, including those most affected, will have the opportunity to receive information, review and submit comments on any proposed submission concerning any of the following documents:

- The draft and final Annual Action Plans
- The draft and final Five-Year Consolidated Plan
- The draft and final Substantial Amendments to either an Annual Action Plan or the Five-Year Consolidated Plan
- Annual Performance Reports
- The Citizen Participation Plan

Copies of the previously identified documents will be made available at advertised public buildings and upon request from the City of Lorain Department of Building, Housing, and Planning.

All correspondence, records, and minutes of public hearings will be retained in the Department of Building, Housing, and Planning. All input received through, or in association with, public meetings and workshops will be retained in the Department of

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Building, Housing, and Planning. Any pertinent information such as written proposals from a citizens group, etc., will be presented to the Building, Housing, and Planning staff for review and consideration. If assistance in reading or obtaining program records is needed, the Department of Building, Housing, and Planning should be contacted at 440-204-2020 or interested parties can access records at the Department of Building, Housing, and Planning at 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain, Ohio 44052. Interested parties may also access any of the program documents at the City of Lorain website, [www.cityoflorain.org](http://www.cityoflorain.org).

#### **Technical Assistance**

Technical assistance will be provided to citizens, citizen groups, nonprofit organizations and agencies that need such assistance in developing project proposals. Such assistance is available upon request from the Department of Building, Housing, and Planning. Anyone needing technical assistance should contact the City of Lorain Department of Building, Housing, and Planning at 440-204-2020.

#### **Anti-Displacement**

The City does not have, nor does it anticipate funding any activities that will displace any resident or businesses. If displacement does occur, the residents or businesses displaced would be entitled to compensation and / or assistance under applicable federal laws. Should the need for displacement ever arise, the City will officially notify the residents or businesses expected to be displaced as soon as practicable following approval of the activity. The notice will include a description of the proposed action, a discussion of how the resident or business owner might be affected, and information concerning their rights and benefits.

#### **Use of the Plan**

The City of Lorain will follow this Citizen Participation Plan in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan, Annual Action Plan and the Performance Report.

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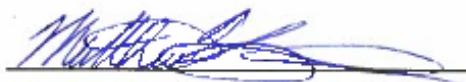
*For more information regarding the Consolidated Plan or to submit your comments: Inquiries and complaints concerning the Consolidated Plan, any amendments, or the performance reports, can be conveyed by contacting the City staff at:*

**Lorain Consolidated Plan Comments**  
Department of Building, Housing, and Planning  
200 West Erie Avenue, 5<sup>th</sup> Floor  
Lorain, OH 44052  
Telephone: (440) 204-2020  
Fax: (440) 204-2080

Complaints and related comments on the programs may also be offered at the public hearings. Written responses to all written complaints may also be made to the Columbus, Ohio Office of the U.S. Department of Housing and Urban Development (HUD) at the following address:

**U.S. Department of Housing and Urban Development**  
Community Planning and Development Division  
Bricker Federal Building  
200 North High Street, 7th Floor  
Columbus, OH 43215  
Telephone: (614) 469-5737  
Fax: (614) 280-6178

Plan approved by:



Matthew Kusznir, Director

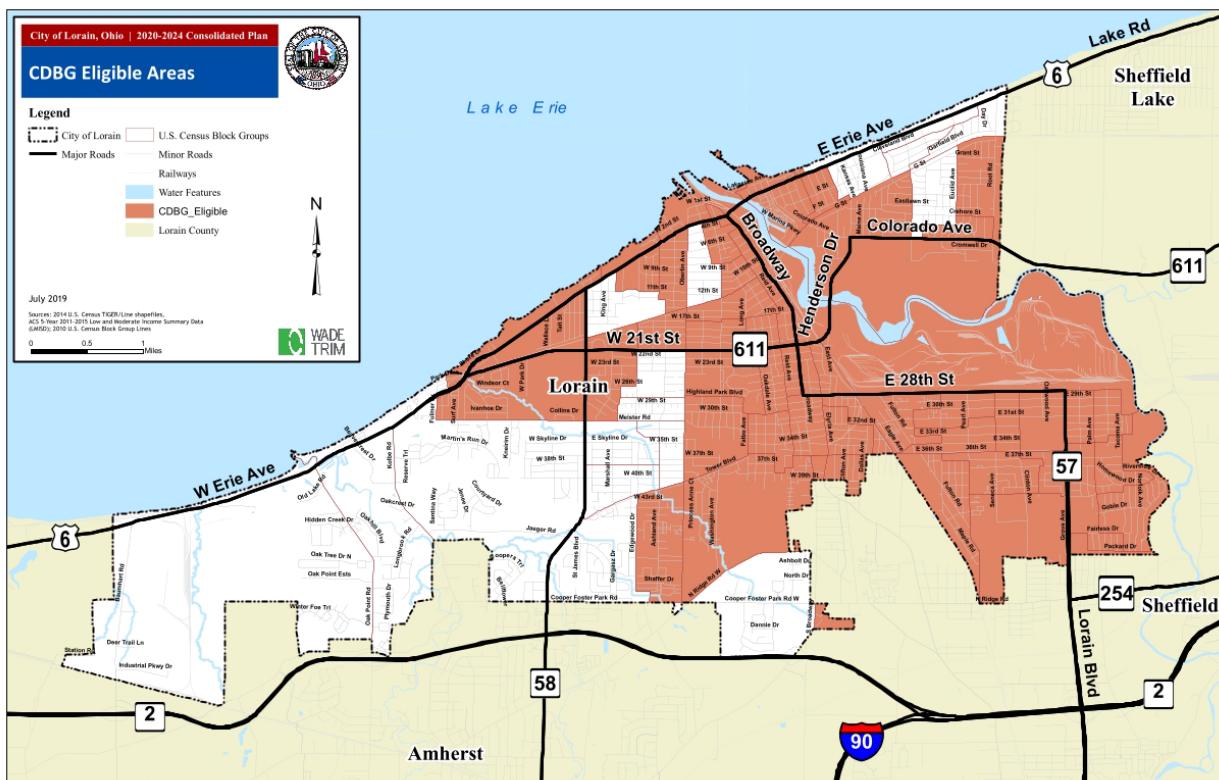
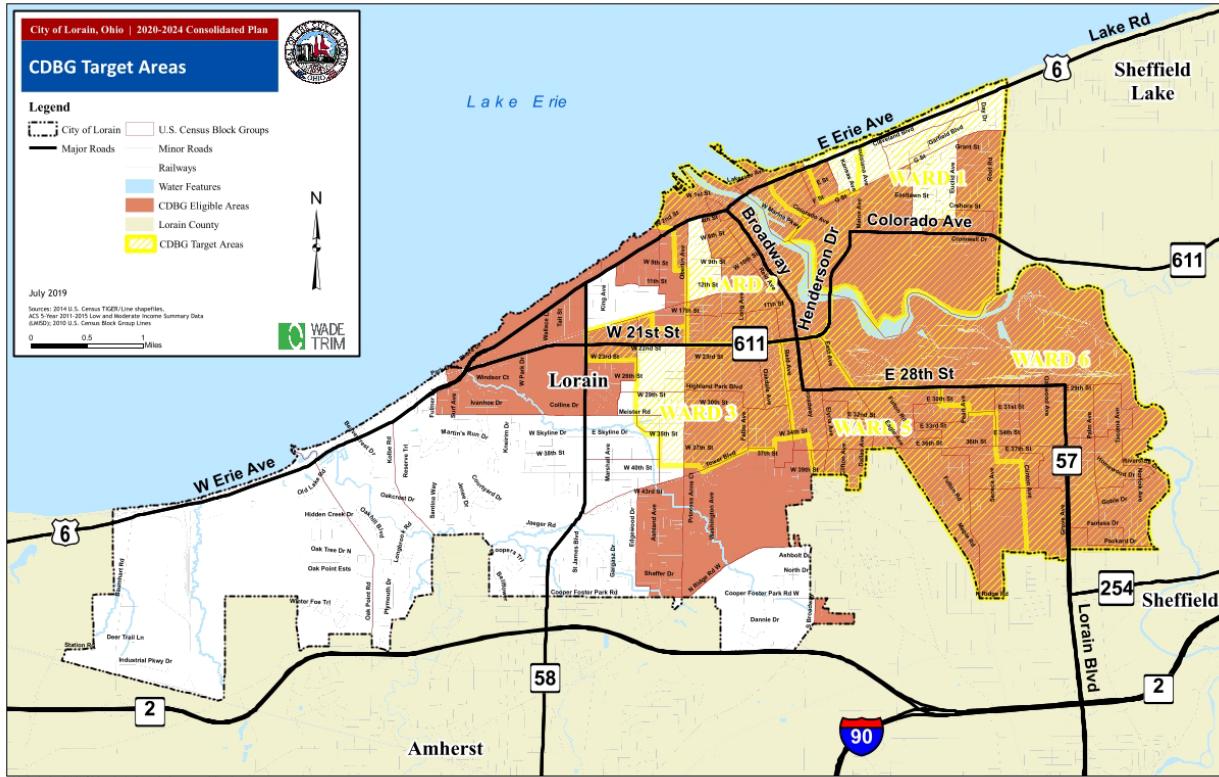
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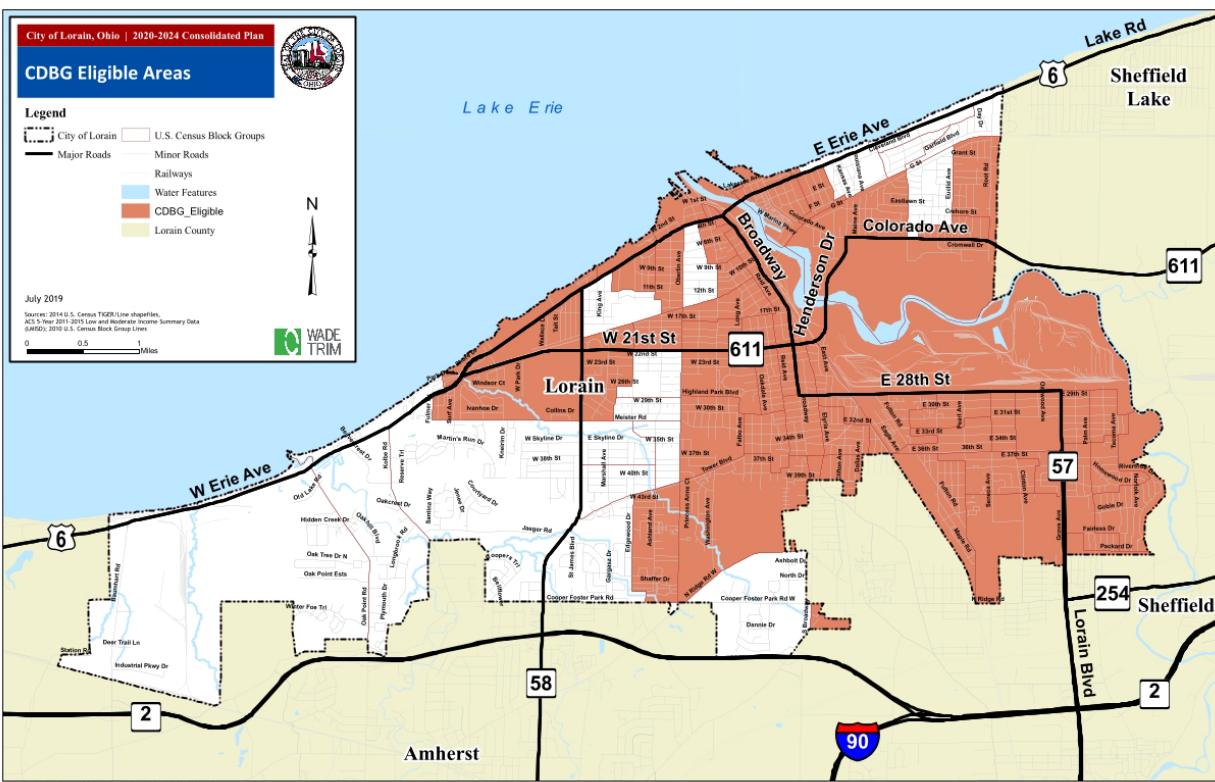
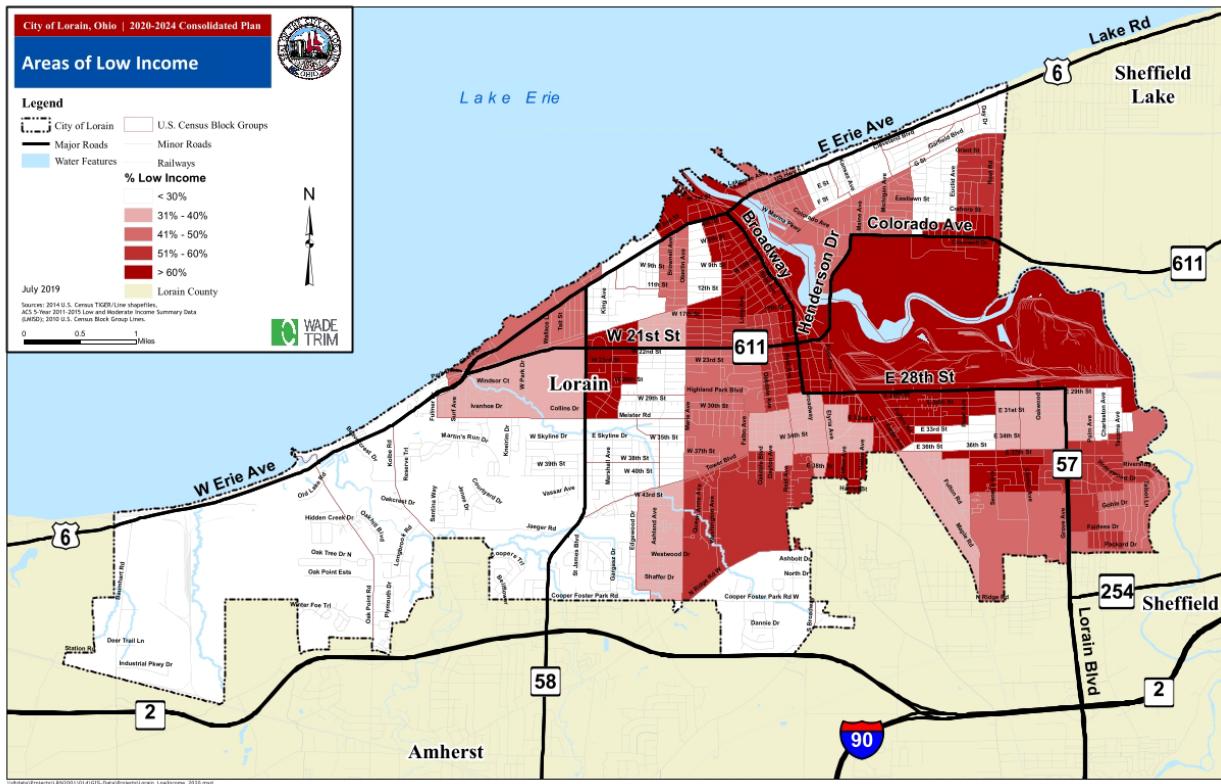
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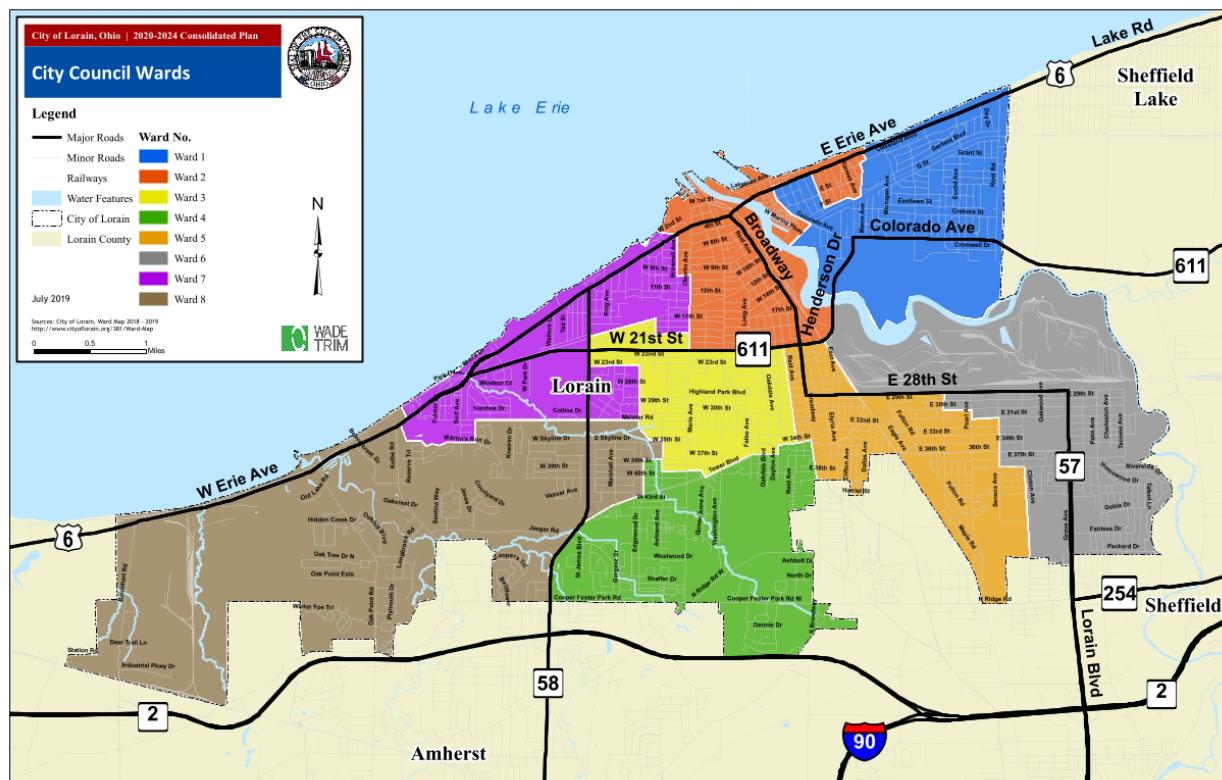
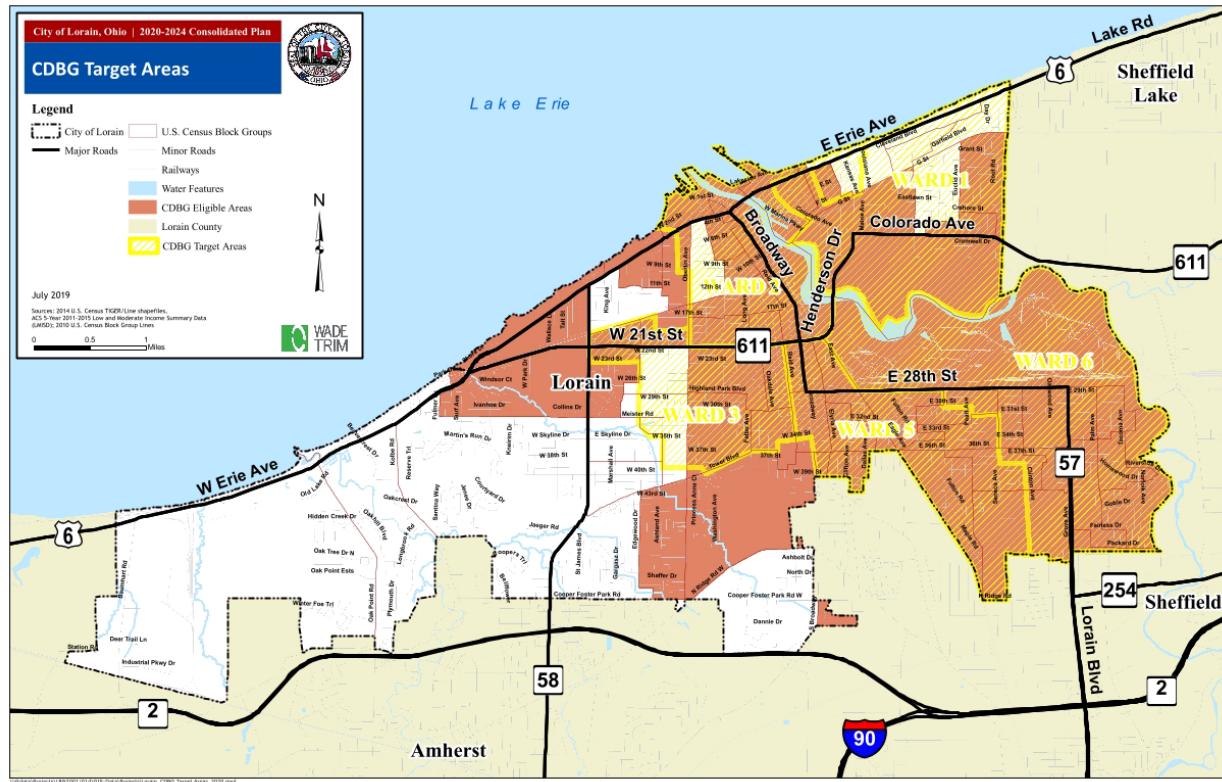


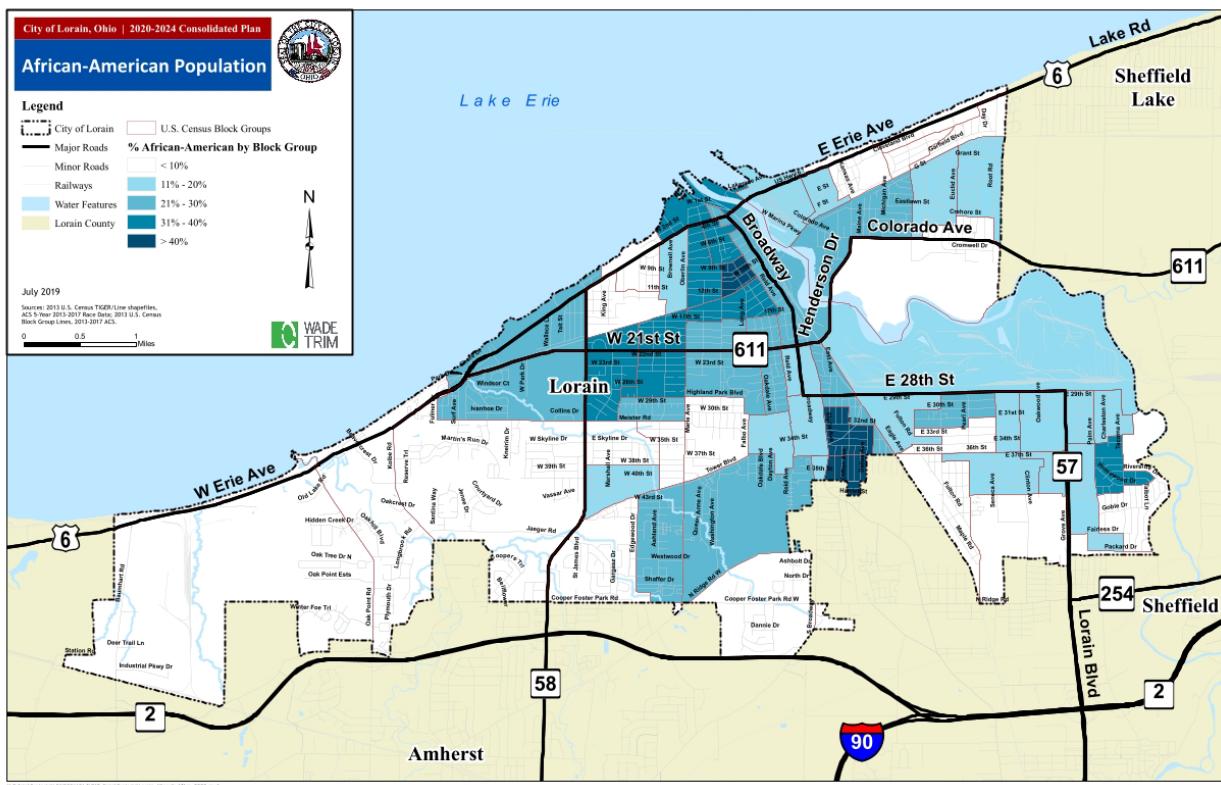
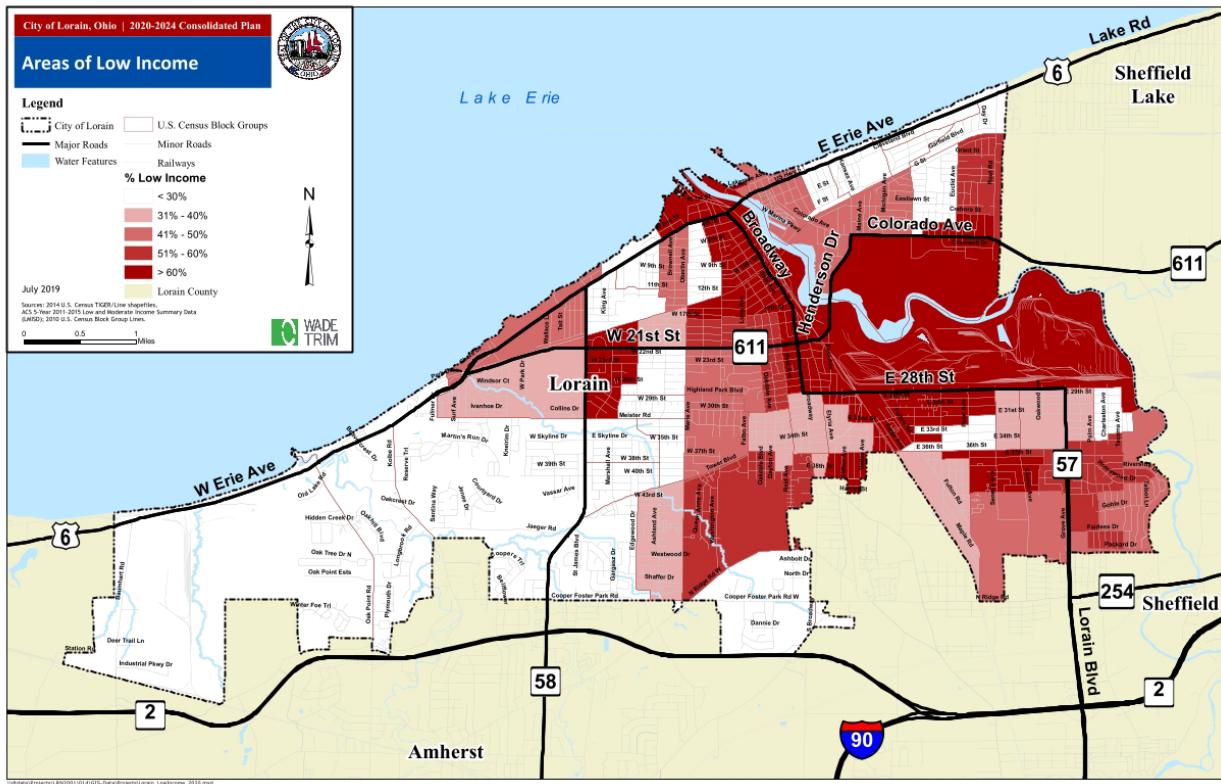
## Grantee Unique Appendices



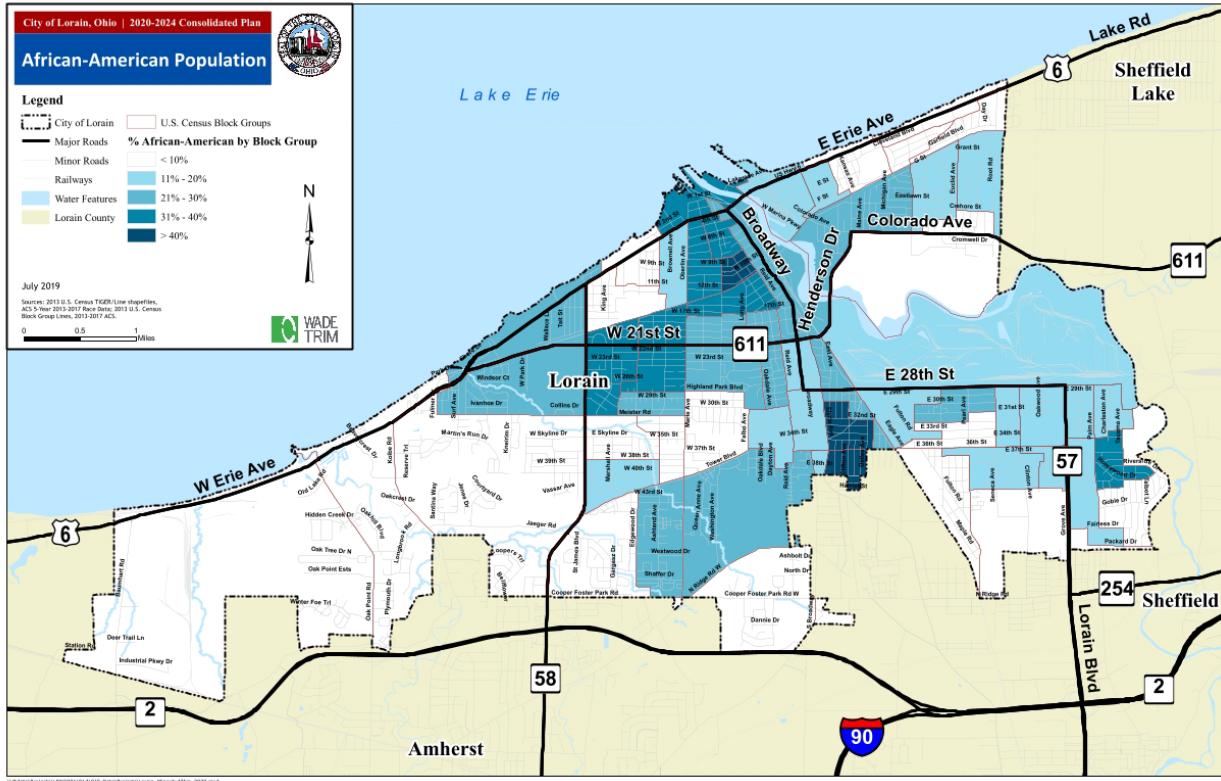


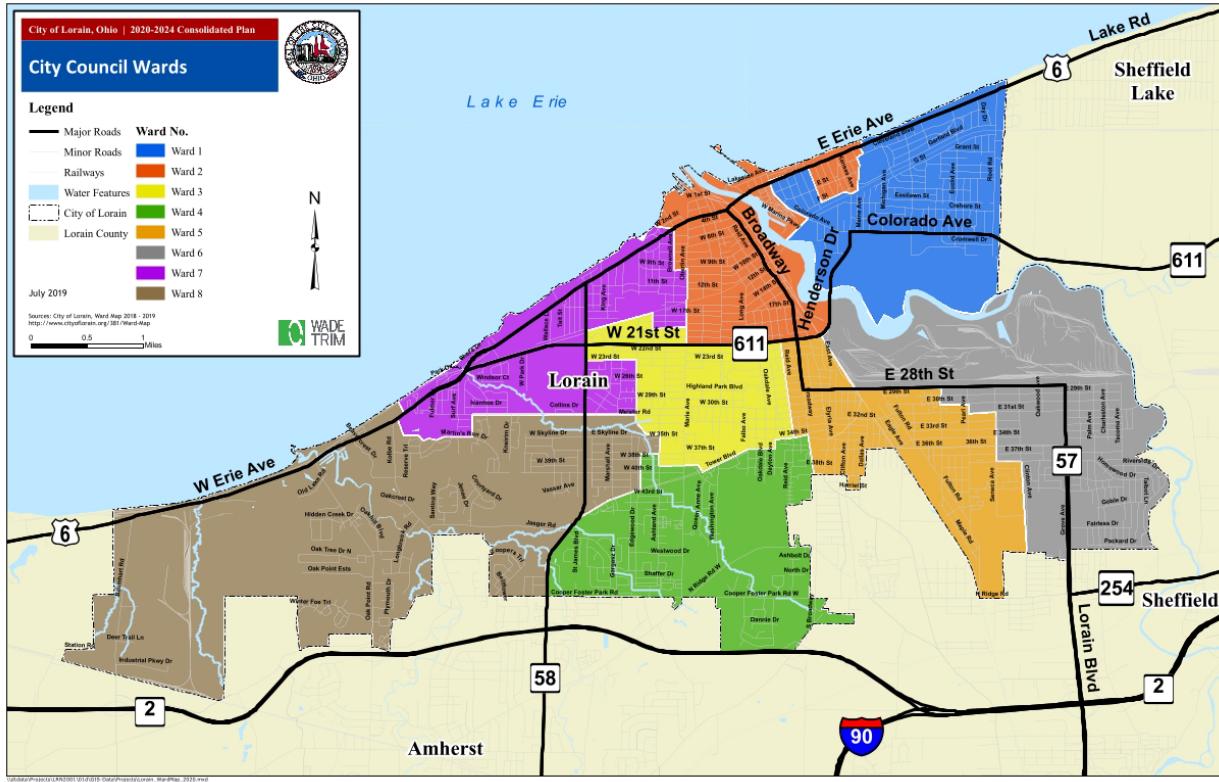












<p><b>Legal Notice Legal Notice</b>  <b>2023 Action Plan Public Notice</b>  <b>City of Lorain, Ohio Building, Housing &amp; Planning Department</b>  <b>2023 Action Plan of the 2020-2024 Consolidated Plan</b>  <b>Community Development Block Grant (CDBG)</b>  <b>HOME Investment Partnership</b></p> <p>The City of Lorain is seeking your participation in the development of the 2023 Action Plan. Under Title I of the Housing and Community Development Act of 1974, as amended in the Cranston-Gonzalez National Affordable Housing Act of 1990, the City of Lorain, Ohio is required to prepare a plan that describes how the City will allocate Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds to meet the needs of low and moderate income persons in the City of Lorain.</p> <p><b>Notice of Plan Availability</b>  The 2023 Action Plan will be available for review and/or comment from March 06, 2023 through April 4, 2023 at 4:00 p.m. The plan is available for review at the Department of Building, Housing and Planning, 200 West Erie Avenue, 5th FL, Lorain, Ohio, Lorain Public Library Main Branch, 351 W. 6th Street, Lorain, Ohio, Lorain Public Library South Lorain Branch , 2121 Homewood Drive, Lorain, Ohio and on the City of Lorain's website (<a href="http://www.cityoflorain.org">www.cityoflorain.org</a>).</p> <p>The following is the anticipated funding and budget for 2023:</p> <table border="1"> <thead> <tr> <th colspan="2"><b>CDBG Revenue</b></th> </tr> </thead> <tbody> <tr> <td>Program Income</td> <td>\$164,400.00</td> </tr> <tr> <td>CDBG Allocation</td> <td>\$1,344,334.00</td> </tr> <tr> <td>Total Anticipated Revenue:</td> <td>\$1,508,734.00</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="2"><b>CDBG Expense Budgets</b></th> </tr> </thead> <tbody> <tr> <td>Administration</td> <td>\$301,746.80</td> </tr> <tr> <td>Public Service</td> <td>\$125,000.00</td> </tr> <tr> <td>Public Facility Improvements</td> <td>\$381,987.20</td> </tr> <tr> <td>Clearance/Demolition</td> <td>\$200,000.00</td> </tr> <tr> <td>Housing</td> <td>\$400,000.00</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="2"><b>HOME Revenue</b></th> </tr> </thead> <tbody> <tr> <td>Program Income</td> <td>\$60,000.00</td> </tr> <tr> <td>HOME Allocation</td> <td>\$628,402.00</td> </tr> <tr> <td>Total Anticipated Revenue:</td> <td>\$688,402.00</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="2"><b>HOME Expense Budgets</b></th> </tr> </thead> <tbody> <tr> <td>Administration</td> <td>\$68,840.20</td> </tr> <tr> <td>CHDO</td> <td>\$94,260.30</td> </tr> <tr> <td>Owner Occupied Rehabilitation</td> <td>\$262,650.75</td> </tr> <tr> <td>Down Payment Assistance</td> <td>\$262,650.75</td> </tr> <tr> <td>Total Budget CDBG/HOME:</td> <td>\$2,197,136.00</td> </tr> </tbody> </table> <p>Each year grant funds are earmarked for projects deemed worthy by citizen input in Lorain. Two (2) Public Hearings have been scheduled to discuss the draft Action Plan. Please join us and let your voice be heard.</p> <p><b>Thursday, April 13, 2023 at 5:30 pm</b>  <b>El Centro De Servicios Sociales, Inc.</b>  <b>1st Floor Conference Room 2800 Pearl Ave</b>  <b>Lorain, OH 44055</b></p> <p><b>Monday, April 17, 2023 at 5:00 pm</b>  <b>City of Lorain</b>  <b>Council Chambers</b>  <b>200 West Erie Ave. 1st Floor</b>  <b>Lorain, OH 44052</b></p> <p>The City will provide technical assistance to citizens and groups representative of persons that request such assistance in developing funding request proposals and in the review of program activities and program performance. In addition, the City will make adequate provisions to assist non-English speaking residents in interpreting program performance on a case-by-case basis, as well as provide auxiliary aides and services for individuals with disabilities. For requests for special accommodations please contact the Director of Building, Housing &amp; Planning, Matt Kusznir at <a href="mailto:Matt_Kusznir@cityoflorain.org">Matt_Kusznir@cityoflorain.org</a> or 440.264.2083. Requests for special accommodations must be made with advanced reasonable notice.</p> <p>2444710/March 7, 2023</p>	<b>CDBG Revenue</b>		Program Income	\$164,400.00	CDBG Allocation	\$1,344,334.00	Total Anticipated Revenue:	\$1,508,734.00	<b>CDBG Expense Budgets</b>		Administration	\$301,746.80	Public Service	\$125,000.00	Public Facility Improvements	\$381,987.20	Clearance/Demolition	\$200,000.00	Housing	\$400,000.00	<b>HOME Revenue</b>		Program Income	\$60,000.00	HOME Allocation	\$628,402.00	Total Anticipated Revenue:	\$688,402.00	<b>HOME Expense Budgets</b>		Administration	\$68,840.20	CHDO	\$94,260.30	Owner Occupied Rehabilitation	\$262,650.75	Down Payment Assistance	\$262,650.75	Total Budget CDBG/HOME:	\$2,197,136.00	<p><b>Legal Notice</b>  <b>Aviso Publico del plan de Accion 2023</b>  <b>Ciudad de Lorain, Ohio</b>  <b>Departamento de Construcción, Vivienda, y Planificación</b>  <b>Plan de Acción 2023 del Plan Consolidado 2020-2024</b>  <b>Subvención en Bloque para el Desarrollo Comunitario (CDBG)</b>  <b>Sociedad de Inversión HOME</b></p> <p>La Ciudad de Lorain busca su participación en el desarrollo del Plan de Acción 2023. Según el Título I de la Ley de Vivienda y Desarrollo Comunitario de 1974, modificada en la Ley Nacional de Vivienda Asequible Cranston-Gonzalez de 1990, la Ciudad de Lorain, Ohio, debe preparar un plan que describa cómo la Ciudad asignará la Subvención en Bloque para el Desarrollo Comunitario (CDBG) y fondos de Sociedad de Inversión, HOME (HOME) para satisfacer las necesidades de las personas de ingresos bajos y moderados en la ciudad de Lorain.</p> <p><b>Aviso de Disponibilidad del Plan</b>  El Plan de Acción 2023 estará disponible para revisión y/o comentarios desde el 6 de Marzo de 2023 hasta el 4 de Abril de 2023 a las 4:00 p. m. El plan está disponible para su revisión en el Departamento de Construcción, Vivienda y Planificación, 200 West Erie Avenue, 5th FL, Lorain, Ohio, Lorain Public Library Main Branch, 351 W. 6th Street, Lorain, Ohio, Lorain Public Library South Lorain Branch , 2121 Homewood Drive, Lorain, Ohio y en la página web de la ciudad de Lorain (<a href="http://www.cityoflorain.org">www.cityoflorain.org</a>).</p> <table border="1"> <thead> <tr> <th colspan="2"><b>Ingresos CDBG</b></th> </tr> </thead> <tbody> <tr> <td>Ingresos del Programa</td> <td>\$164,400.00</td> </tr> <tr> <td>Asignación CDBG</td> <td>\$1,344,334.00</td> </tr> <tr> <td><b>Ingresos Totales Anticipados:</b></td> <td><b>\$1,508,734.00</b></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="2"><b>Presupuestos de Gastos de CDBG</b></th> </tr> </thead> <tbody> <tr> <td>Administración</td> <td>\$301,746.80</td> </tr> <tr> <td>Servicio Público</td> <td>\$125,000.00</td> </tr> <tr> <td>Mejoras a Instalaciones Públicas</td> <td>\$381,987.20</td> </tr> <tr> <td>Liquidación/Demolición</td> <td>\$200,000.00</td> </tr> <tr> <td>Vivienda</td> <td>\$400,000.00</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="2"><b>Ingresos HOME</b></th> </tr> </thead> <tbody> <tr> <td>Ingresos del Program</td> <td>\$60,000.00</td> </tr> <tr> <td>Asignación HOME</td> <td>\$628,402.00</td> </tr> <tr> <td><b>Ingresos Totales Anticipados:</b></td> <td><b>\$688,402.00</b></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="2"><b>Presupuestos de Gastos HOME</b></th> </tr> </thead> <tbody> <tr> <td>Administración</td> <td>\$68,840.20</td> </tr> <tr> <td>CHDO</td> <td>\$94,260.30</td> </tr> <tr> <td>Rehabilitación Ocupada</td> <td></td> </tr> <tr> <td>por el Propietario</td> <td>\$262,650.75</td> </tr> <tr> <td>Asistencia Para el Desembolso Inicial</td> <td>\$262,650.75</td> </tr> <tr> <td><b>Presupuesto Total CDBG/HOME:</b></td> <td><b>\$2,197,136.00</b></td> </tr> </tbody> </table> <p>Cada año, los fondos de la subvención se destinarán a proyectos considerados valiosos por los aportes de los ciudadanos en Lorain. Se han programado dos (2) Audiencias Públicas para discutir el borrador del Plan de Acción. Únase a nosotros y deje que su voz sea escuchada.</p> <p><b>Jueves, 13 de Abril, 2023 a las 5:30 pm</b>  <b>El Centro De Servicios Sociales, Inc.</b>  <b>1st Floor Conference Room 2800 Pearl Ave</b>  <b>Lorain, OH 44055</b></p> <p><b>Lunes, 17 de Abril, 2023 a las 5:00 pm</b>  <b>City of Lorain</b>  <b>Council Chambers</b>  <b>200 West Erie Ave. 1st Floor</b>  <b>Lorain, OH 44052</b></p> <p>La Ciudad brindará asistencia técnica a los ciudadanos y grupos representativos de personas que soliciten dicha asistencia en el desarrollo de propuestas de solicitud de financiamiento y en la revisión de las actividades y el desempeño del programa. Además, la ciudad tomará medidas adecuadas para ayudar a los residentes que no hablen inglés a interpretar el desempeño del programa caso por caso, así como brindar ayuda y servicios auxiliares para personas con discapacidades. Para solicitudes de adaptaciones especiales, comuníquese con el Director de Construcción, Vivienda y Planificación, Matt Kusznir en <a href="mailto:Matt_Kusznir@cityoflorain.org">Matt_Kusznir@cityoflorain.org</a> o 440.264.2083. Las solicitudes de adaptaciones especiales deben hacerse con un aviso previo razonable.</p> <p>2444785/March 7, 2023</p>	<b>Ingresos CDBG</b>		Ingresos del Programa	\$164,400.00	Asignación CDBG	\$1,344,334.00	<b>Ingresos Totales Anticipados:</b>	<b>\$1,508,734.00</b>	<b>Presupuestos de Gastos de CDBG</b>		Administración	\$301,746.80	Servicio Público	\$125,000.00	Mejoras a Instalaciones Públicas	\$381,987.20	Liquidación/Demolición	\$200,000.00	Vivienda	\$400,000.00	<b>Ingresos HOME</b>		Ingresos del Program	\$60,000.00	Asignación HOME	\$628,402.00	<b>Ingresos Totales Anticipados:</b>	<b>\$688,402.00</b>	<b>Presupuestos de Gastos HOME</b>		Administración	\$68,840.20	CHDO	\$94,260.30	Rehabilitación Ocupada		por el Propietario	\$262,650.75	Asistencia Para el Desembolso Inicial	\$262,650.75	<b>Presupuesto Total CDBG/HOME:</b>	<b>\$2,197,136.00</b>
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<b>Ingresos Totales Anticipados:</b>	<b>\$1,508,734.00</b>																																																																																		
<b>Presupuestos de Gastos de CDBG</b>																																																																																			
Administración	\$301,746.80																																																																																		
Servicio Público	\$125,000.00																																																																																		
Mejoras a Instalaciones Públicas	\$381,987.20																																																																																		
Liquidación/Demolición	\$200,000.00																																																																																		
Vivienda	\$400,000.00																																																																																		
<b>Ingresos HOME</b>																																																																																			
Ingresos del Program	\$60,000.00																																																																																		
Asignación HOME	\$628,402.00																																																																																		
<b>Ingresos Totales Anticipados:</b>	<b>\$688,402.00</b>																																																																																		
<b>Presupuestos de Gastos HOME</b>																																																																																			
Administración	\$68,840.20																																																																																		
CHDO	\$94,260.30																																																																																		
Rehabilitación Ocupada																																																																																			
por el Propietario	\$262,650.75																																																																																		
Asistencia Para el Desembolso Inicial	\$262,650.75																																																																																		
<b>Presupuesto Total CDBG/HOME:</b>	<b>\$2,197,136.00</b>																																																																																		

## Featured News

### [Ciudad de Lorain - Aviso público del plan de acción 2023](#)

Posted March 6, 2023

#### **Aviso público del plan de acción 2023**

Ciudad de Lorain, Ohio

Departamento de Construcción, Vivienda y Planificación

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Plan de Acción 2023 del Plan Consolidado 2020-2024

Subvención en bloque para el desarrollo comunitario (CDBG)

Sociedad de inversión HO...

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### [The City of Lorain - 2023 CDBG/HOME Action Plan - Public Notice](#)

Posted March 6, 2023

#### **2023 Action Plan Public Notice**

City of Lorain, Ohio

Building, Housing & Planning Department

2023 Action Plan of the 2020-2024 Consolidated Plan

Community Development Block Grant (CDBG)

HOME Investment Partnership

The City of Lorain is se...

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### [The City of Lorain's Recovery Plan](#)

Posted March 9, 2022

Residents of Lorain,

It gives me great pleasure to present to you the City of Lorain's Recovery Plan. The City of Lorain will receive over \$32 Million of American Rescue Plan Act (ARPA) Funding to allocate towards impactful recovery solutions to the COVID-...

## **▼ Building, Housing & Planning Department**

3 Stories

Posted on: March 6, 2023

### **Ciudad de Lorain - Aviso público del plan de acción 2023**

#### **Aviso público del plan de acción 2023**

Ciudad de Lorain, Ohio

Departamento de Construcción, Vivienda y Planificación

Plan de Acción 2023 del Plan Consolidado 2020-2024

Subvención en bloque para el desarrollo comunitario (CDBG)

Sociedad de inversión HOME

La Ciudad de Lorain busca su participación en el desarrollo del Plan de Acción 2023.

Según el Título I de la Ley de Vivienda y Desarrollo Comunitario de 1974, modificada en la Ley Nacional de Vivienda Asociada Cranston-Gonzalez de 1990, la Ciudad de Lorain, Ohio, debe preparar un plan que describa cómo la Ciudad asignará la Subvención en Bloque para el Desarrollo Comunitario (CDBG) y fondos de HOME Investment Partnership (HOME) para satisfacer las necesidades de las personas de ingresos bajos y moderados en la ciudad de Lorain.

#### **Aviso de disponibilidad del plan**

El Plan de Acción 2023 estará disponible para revisión y/o comentarios desde el 6 de marzo de 2023 hasta el 4 de abril de 2023 a las 1:00 p. m. El plan está disponible para su revisión en el Departamento de Construcción, Vivienda y Planificación, 200 West Erie Avenue, 5th Fl., Lorain, Ohio, Lorain Public Library Main Branch, 351 W. 6th Street, Lorain, Ohio, Lorain Public Library South Lorain Branch, 2121 Homewood Drive, Lorain, Ohio y en el sitio web de la Ciudad de Lorain ([www.cityoflorain.org](http://www.cityoflorain.org)).

La siguiente es la financiación y el presupuesto previstos para 2023:

#### **Ingresos CDBG**

Ingresos del programa	\$161,100.00
Asignación de CDBG	\$1,541,334.00
Ingresos totales anticipados: \$1,508,734.00	

#### **Presupuestos de gastos de CDBG**

Administración	\$501,746.80
Servicio público	\$125,000.00
Mejoras en las instalaciones públicas	\$381,982.20
Liquidación/Demolición	\$200,000.00
Alquileramiento	\$400,000.00

### **Aviso público del plan de acción 2023**

Ciudad de Lorain, Ohio

Departamento de Construcción, Vivienda y Planificación

Plan de Acción 2023 del Plan Consolidado 2020-2024

Subvención en bloque para el desarrollo comunitario (CDBG)

Sociedad de inversión HO...

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Building, Housing & Planning Department

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Posted on: March 6, 2023

**[The City of Lorain - 2023 CDBG/HOME Action Plan - Public Notice](#)**

**2023 Action Plan Public Notice**

City of Lorain, Ohio

Building, Housing & Planning Department

2023 Action Plan of the 2020-2024 Consolidated Plan

Community Development Block Grant (CDBG)

HOME Investment Partnership

The City of Lorain is se...

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Building, Housing & Planning Department

**2023 Action Plan Public Notice**

City of Lorain, Ohio

Building, Housing &amp; Planning Department

## 2023 Action Plan of the 2020-2024 Consolidated Plan

Community Development Block Grant (CDBG)

HOME Investment Partnership

The City of Lorain is seeking your participation in the development of the 2023 Action Plan.

Under Title I of the Housing and Community Development Act of 1974, as amended in the Cranston-Gonzalez National Affordable Housing Act of 1990, the City of Lorain, Ohio is required to prepare a plan that describes how the City will allocate Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds to meet the needs of low and moderate income persons in the City of Lorain.

**Notice of Plan Availability**

The 2023 Action Plan will be available for review and/or comment from March 06, 2023 through April 4, 2023 at 4:00 p.m. The plan is available for review at the Department of Building, Housing and Planning, 200 West Erie Avenue, 5th FL, Lorain, Ohio, Lorain Public Library Main Branch, 351 W. 6th Street, Lorain, Ohio, Lorain Public Library South Lorain Branch, 2121 Homewood Drive, Lorain, Ohio and on the City of Lorain's website ([www.cityoflorain.org](http://www.cityoflorain.org)).

The following is the anticipated funding and budget for 2023:

**CDBG Revenue**

Program Income	\$164,400.00
CDBG Allocation	\$1,344,334.00

**Total Anticipated Revenue: \$1,508,734.00****CDBG Expense Budgets**

Administration	\$301,746.80
Public Service	\$125,000.00
Public Facility Improvements	\$381,987.20
Clearance/Demolition	\$900,000.00
Housing	\$400,000.00

Posted on: March 9, 2022

**The City of Lorain's Recovery Plan**

Residents of Lorain,

It gives me great pleasure to present to you the City of Lorain's Recovery Plan. The City of Lorain will receive over \$32 Million of American Rescue Plan Act (ARPA) Funding to allocate towards impactful recovery solutions to the COVID-...

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Building, Housing &amp; Planning Department

**Action Plan / Citizen Participation Meeting****Sign-In Sheet****Monday, April 17, 2023****5:00-6:00 PM****Lorain City Hall, Council Chambers****200 West Erie Avenue, Lorain, OH 44052**

Name and Organization – Print	Contact Information (Telephone Number)	Email Address	Address
Sylvia Duball	440-670-6027	duvallysylvia@yahoo.com	1321 W. 57th St
Susan Tarcinski	440-204-2020	Sarah.Karpinski@cityoflorain.org	200 W. Erie Ave Lorain
Jose LABOY	440-358-6433	ESCAPEESTATE LLC	823 W. 18th Lorain
John Pardue	440-315-2735	jpincave@gmail.com	47391 Gambrel Rd. Oberlin
Patrick Herl	416 903 7031		1015 W. 18th Lorain Blvd
Ryan Devey	440-304-2020	Ryan.Devey@cityoflorain.org	200 W. Erie Ave
Tim McLean	440-304-2182	Tim.McLean@cityoflorain.org	100 W. Erie Ave
Key Linton	440-287-1179	Key.Linton@cityoflorain.org	200 W. Erie Ave
Deanne Marin	440-319-6216	Deanne.Marin@cityoflorain.org	200 W. Erie Ave
Beth Henley	440-319-8719	Beth.Henley@cityoflorain.org	200 W. Erie Ave
Maya Bradley	440-304-3002	Maya.Bradley@cityoflorain.org	200 W. Erie Ave
Matt Kusinski	440-204-4020	Matt.Kusinski@cityoflorain.org	200 W. Erie Ave
Hannah Kuski	440-202-3020	Hannah.Kuski@cityoflorain.org	200 W. Erie Ave

City of Lorain Building, Housing &amp; Planning – Meeting Sign-In Sheet



# CITY OF LORAIN

2023 Action Plan, Public Hearing #2

Lorain City Hall, Council Chambers

Friday, April 17, 2023 | 5:00pm



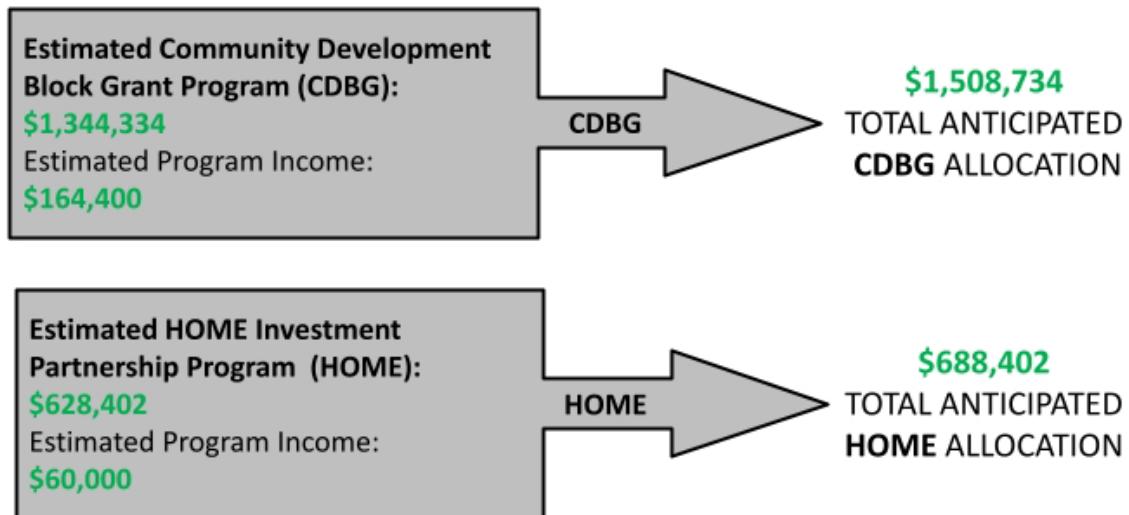
1

# Federal Requirements

Under Title I of the Housing and Community Development Act of 1974, as amended and the Cranston-Gonzalez National Affordable Housing Act of 1990, the City of Lorain, Ohio is required to prepare a plan that describes how the City will allocate Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds to meet the needs of low and moderate income persons in the City of Lorain.



# Anticipated Funds



# **CDBG Allocation Administration Costs**

- Salaries and Fringes, training, legal ads, etc:  
**\$301,746.80**



# **CDBG Allocation**

## **Public Service**

- Public Service Projects TBD: \$125,000



# **CDBG Allocation**

## **Street Improvements**

- Street Improvements TBD: \$261,987.20



# CDBG Allocation Public Facility Improvements

- Public Facility Improvements

Open Applications: \$120,000



# CDBG Allocation

## Housing

- Home Repair: \$400,000



# **CDBG Allocation**

## **Public Housing Rehabilitation**

- Public Housing Rehab: \$100,000



# CDBG Allocation

## Demolition

- Demolition: \$200,000



# **HOME Allocation Administration Costs**

- Administration: \$68,840.20



# **HOME Allocation**

## **Housing**

- HOME Rehabilitation: \$262,650.75



# **HOME Allocation**

## **Down Payment Assistance**

- Down Payment Assistance: \$262,650.75



# **HOME Allocation Community Housing Development Organization (CHDO)**

- CHDO: \$94,260.30



# Accessing the Plan

## Notice of Plan Availability

The 2023 Action Plan will be available for review and/or comment from March 06, 2023 through April 4, 2023 at 4:00pm. The plan is available for review at:

- Department of Building, Housing and Planning, 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain OH
- Lorain Public Library Main Branch, 351 W. 6<sup>th</sup> Street., Lorain, OH
- Public Library South Lorain Branch, 2121 Homewood Drive, Lorain, OH
- City of Lorain's website ([www.cityoflorain.org](http://www.cityoflorain.org))

Inquiries and comments concerning the Action Plan can be conveyed by contacting the City staff at:

Matthew Kusznir

Department of Building, Housing and Planning

200 West Erie Avenue, Lorain OH 44052

Telephone: 440-204-2020

Fax: 440-204-2080

[Matt\\_kusznir@cityoflorain.org](mailto:Matt_kusznir@cityoflorain.org)



# Public Hearings

Two public hearings will be held for the 2023 Annual Action Plan:

**Thursday April 13, 2023 at 5:30pm**

El Centro de Servicios Sociales, Inc.

1<sup>st</sup> Floor Conference Room, 2800 Pearl Avenue, Lorain, OH 44055

**Monday, April 17, 2023 at 5:00pm**

City of Lorain, Council Chambers

200 West Erie Avenue, Lorain, OH 44052





## Questions

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## **Action Plan CDBG Minutes**

**April 17, 2023**

**Matt Kusznir:** Good Evening, everybody. It's about 5:30pm so we are going to get started. My name is Matt Kusznir and I am the Director of Building, Housing, Planning for the City of Lorain. Actually, in the back row we have a few of our management staff from Building, Housing, Planning from left to right Sarah Karpinski, Hannah Kiraly and Robyn Davey will help administer the federal programs for the City. This Action Plan public hearing is part of a mandatory requirement that we have for the Department of Housing and Urban Development and it is something we do every year to inform the public how we are going to spend the federal funds and our CDBG entitlement every year, CDBG and HOME entitlement for the year. So without further adieu, on Federal Requirements, so as a part of Title I of the Housing and Community Development Act of 1974, as amended and the Cranston-Gonzalez Affordable Housing Act of 1990, the City of Lorain again, is required to prepare a plan that describes how we are going to spend the CDBG and HOME funds every year. Particularly the point is to help and meet the needs of low and moderate income persons in the City of Lorain.

Here is a breakdown of our CDBG and our HOME allocation. So in the top left corner you will see the estimated Community Development Block Grant Program (CDBG) at approximately \$1.3 million dollars with about \$164,000 of program income. That total allocation that we expect is approximately \$1.5 million dollars.

With HOME, which stands for Home Investment Partnership Program, which is abbreviated by HOME, we anticipate receiving approximately \$628,000 of entitlement funds for HOME and \$60,000 program income for HOME which brings us to a total of \$2.197 million dollars of our federal entitlement allocation made up of HOME and CDBG funds.

So, first and foremost, as a part of the CDBG requirements, we're allowed to allocate 20% of our allocation for administrative costs. What that means, and what those administrative costs cover are legal ads, salaries, fringes, training, really anything that is miscellaneous but still needed for the City of Lorain to administer and run the programs and administer the funds generally.

Public Service Projects we've allocated \$125,000. The reason that we have *to be determined* is because we have recently just had an application window and accepted applications from different non-profit groups in the community to apply for funding for us to run different activities in the City of Lorain. So we are waiting until HUD gives us the green light and the final allocation funding before we move forward with any of those programs and with any of those applications but we have received quite a few. We will be selecting groups to give funding to after that.

Street improvements also we have *to be determined* for the specific locations of the streets but we have allocated approximately \$261,000 to street improvements. Just as a note, all these street improvement projects have to be in LMI areas or low to moderate income areas as identified by the Census Bureau or as identified with the Census Bureau data.

Public Facility Improvements we have allocated about \$120,000 towards both so any improvements. This is going to be a neat program that we launch so historically we have allocated these types of funds to different parks in the City or other commonly used spaces in the City that the City owns. Additionally, we have also, I believe last year, we allocated a substantial amount of money to the Harrison Cultural Center as an eligible activity. It is not a City owned property but since they assist low to moderate persons in the City of Lorain and in the eligible census tract they were eligible to receive funding for their facility. So this is going to be something new, where different non-profits, in the City, that are ineligible census tracts and serve the community they will be eligible to apply for this source of funding and possibly make some improvements or upgrades or maintenance to their existing facilities.

Our CDBG Allocation for Housing, we are allocating approximately \$400,000. This is a little bit deceptive because we operate a few different programs out of these HOME repair funds. We have a Roof and Gutters Program and we are also launching a minor repair program and a senior repair program. Hopefully this year, barring acceptance of our Action Plan with HUD.

Public Housing Rehab we are allocating approximately \$100,000. We have been working very closely with Lorain Metropolitan Housing Authority and we decided to allocate \$100,000 to particularly one of their sites that is ineligible for improvements from their sources of funding. These funds will be used to fill the gap and needs of a particular facility in the City of Lorain.

Demolition with many blighted properties, residential and commercial, in the City, in addition to the funds that City Council has allocated to the Department of Building, Housing and Planning and to the City, we have allocated \$200,000 of block grant funds for demolition activities in LMI areas particularly. This amount of money can be eaten up quite quickly especially if we do a commercial property. But at least we will be able to, hopefully, in a neighborhood that needs it.

So, transitioning over to the HOME funds. Administration costs slightly less percentage of HOME funds that we can allocate for administrative costs. It is about 10% of our allocation, again, to fill the needs of salaries, fringes, legal ads and any other miscellaneous expenditures that we have to operate the program.

For HOME rehab, this is a program that is set aside for block grant funds. The HOME Rehab Program for eligible homeowners they can request up to \$45,000 worth of repairs to their home but the idea is to fix every co-deficiency in the property and that is something that we have to do per the federal guidelines. So allocating \$262,000 for that.

A down payment assistance program, we are allocating about the same amount for the HOME Rehab program another \$262,000. We plan on launching this program this year. This is a program that we really have had to build from the ground up. This is not a program that the City has done without a sub-recipient or without a partner. But this is something we are bringing in house with the amount of funding that we have.

The Community Housing Development Organization or CHDO we are allocating \$94,000 to that kind of an organization however, right now, the City of Lorain does not have a HUD recognized CHDO in the City of Lorain, which is required per the guidelines from Housing Urban Development. We have had some interest of a few groups that wanted to branch out into the City of Lorain that will be hopefully be applying for this type of funding this year. But those discussions are very preliminary and those groups still have a lot of work to do to become a recognized CHDO in the City of Lorain.

Assessing the Plan – the Plan is available in the Building, Housing and Planning Department at both libraries and online. It is available for review and even though the comment period has closed, we are still accepting comments and will forward all of those to HUD as well.

This is the second and last public hearing for the 2023 Annual Action Plan. The first one was this past Thursday at El Centro in South Lorain. And with that, are there any questions? I should have mentioned this at the beginning, if you were here for the public hearing, if you could please sign in on the sign in sheet. That is also something we want to send to HUD with our Action Plan to show that the City made its best effort to reach the public, to obtain any questions and also to receive any comments. Are there any questions?

**Rey Carrion:** Thank you, Matt. I appreciate the update. The recent plan that is in place for the expenditure of those CDBG and HOME dollars. One of my first questions is knowing that the facility does not have a recognized CHDO we do have \$94,000 set aside for that. How does the City plan to use those dollars? (inaudible) assigned to a CHDO so is there a plan for that?

**Matt Kusznir:** The CHDO funds are mandatory set aside. We are not allowed to reallocate those funds for a different project. However, what we have done in the past, after a couple of years, we can request a waiver of the CHDO set aside and, upon approval of the set aside we can reallocate those funds to the rehab program or the down payment assistance program. But as of right now we have to have those funds mandatorily set aside.

**Rey Carrion:** Thank you. I would like to follow up on the same topic. Were there any totals set aside in the last year or two? And what were those dollars earmarked, possible waiver down the road, a little bit more the city is required to set aside annual CHDO HOME.

**Matt Kusznir:** Absolutely. So, as soon as the timeline has elapsed for us to request a waiver, we immediately request the CHDO set aside the waiver. We can't allocate the bonds but as of

right now the CHDO funds have been removed from CHDO status and reallocated to programs they will all be reallocated to the HOME rehab program.

**Rey Carrion:** It's a waiver?

**Matt Kusznir:** Correct. Only with the waiver, yes.

**Rey Carrion:** are these done on an annual basis?

**Matt Kusznir:** I don't believe so. I don't believe we do those. Actually, I don't know.

**Rey Carrion:** Thank you.

**Matt Kusznir:** Are there any other questions members of the public? So this is a public hearing so it does not have the Council formality. So if there is anyone who has any questions they can come to the mike.

**Beth Henley:** Am I correct that those are LMI areas from the most recent census? So I can go by that?

**Matt Kusznir:** Yes. We go by that or the most recent demographic data from the most recent census. We have identified four target wards based on the percentage of LMI individuals. Those are 2, 3, 5, and 6.

**Rey Carrion:** I have another question. You showed on the down payment assistance program over \$200,000 set aside for that program and you mentioned that the City is bringing that program in house. Has there been any discussion possibly to collaborate with El Centro? El Centro has had extensive training to become certified to be able to provide that type of service. Is that something that is a possibility or is this something totally different that you are pursuing?

**Matt Kusznir:** So we have historically funded El Centro for home buyer education as well as financial literacy classes. But that is something that we are looping them in for this particular program as well. So, ideally we would like to use El Centro as they, I believe, are the only HUD certified housing counseling agency that is not LMHA in the City of Lorain. So we want to utilize them as much as we can moving forward with this program.

**Rey Carrion:** Thank you. One more question. With the prospect of bringing that program in house, will that require additional staff in order to administer those programs or are you able to do so with the current team?

**Matt Kusznir:** We are actually using a particular person in the Housing division right now. But we are working with our building inspectors in the ?? to fill that Housing Rehabilitation Administrator role. But we are also bringing someone on board, hopefully this upcoming Monday, who was approved by Civil Service last week, as our Housing Development Coordinator, who will be heading up particularly with HOME funds.

**JoAnn Moon:** Thank you and thank you for this presentation. Hat's off to El Centro but are you going to take this to any other areas like east side, west side or central Lorain? We have a lot of people can't get over to El Centro all the time so it would be nice if you could venture out into other areas.

**Matt Kusznir:** Absolutely. When we start doing the home buyer education courses and the financial literacy courses, we will definitely keep that in mind. Do any members of the public have any questions? OK, well thank you everyone and we will close the public hearing.

ORDINANCE NO. 82-23

AN ORDINANCE APPROVING THE CITY OF LORAIN'S PROGRAM YEAR 2023 CDBG AND HOME ONE-YEAR ACTION PLAN AND AUTHORIZING THE MAYOR TO SUBMIT FOR FINANCIAL ASSISTANCE UNDER THE HOUSING AND COMMUNITY DEVELOPMENT ACT OF 1974, AS AMENDED, AND THE CRANSTON GONZALEZ NATIONAL AFFORDABLE HOUSING ACT OF 1990, AS AMENDED, AUTHORIZING THE SAFETY/SERVICE DIRECTOR TO ENTER INTO ALL CONTRACTS AND AGREEMENTS TO ACCEPT FINANCIAL ASSISTANCE, APPROPRIATING THE FUNDS, AND ESTABLISHING THE INDIVIDUAL ACCOUNTS CONSISTENT WITH ALL ATTACHED BUDGETS; AND DECLARING AN EMERGENCY.

WHEREAS, Federal financial assistance is available to the City of Lorain under the Housing and Community Development Act of 1974, as amended, for the purposes of eliminating slum and neighborhood blight and improving housing and economic opportunities for low and moderate income persons; and,

WHEREAS, Federal financial assistance is available to the City of Lorain under the Cranston Gonzalez National Affordable Housing Act of 1990, as amended, for the purpose of expanding the supply of decent, safe, sanitary and affordable housing for very low-income and low-to-moderate income persons; and,

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) issued federal regulations on January 4, 1995 that consolidates into the single submission the planning application process for the Community Development Block Grant (CDBG) program; the Emergency Shelter Grant (ESG); the HOME Investment Partnership (HOME) Program; and Housing Opportunities for Persons with AIDS (HOPWA) programs; and,

WHEREAS, The City of Lorain has prepared a One-Year Action Plan that implements the goals and objectives found in the prior Five-Year Consolidated Plan; and,

WHEREAS, The City of Lorain has made the 2023 One-Year Action Plan available to the public through advertising that the plan is on file at the Lorain Public Library's Main Branch and South Lorain Branch, Loraincounty.com website, as well as within the Department of Building, Housing and Planning and the City of Lorain's webpage for a minimum thirty (30) days for citizen participation public comments; and,

WHEREAS, A copy of the 2023 Annual Action Plan and Budget Summary Attached hereto as "Exhibit A".

NOW, THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE CITY OF LORAIN,  
STATE OF OHIO:

**SECTION I.** That Lorain City Council hereby approves the 2023 One-Year Action Plan budget for the Community Development Block Grant Program, HOME Investment Partnership Program, and other departmental funds attached hereto and incorporated herein by reference as "Exhibit A."

**SECTION II.** That the Mayor be and hereby is authorized and directed to execute all necessary documents with the U.S. Department of Housing and Urban Development on behalf of the City of Lorain for funding under the CDBG, HOME and other federal programs in accordance with applicable federal laws.

**SECTION III.** That the Director of Public Safety & Service be and hereby is authorized and directed to enter into all contracts and agreements to accept financial assistance, appropriating the funds and establishing the individual accounts consistent with all attached budgets.

**SECTION IV.** That City Council hereby appropriates for the entire calendar year 2023, the full amount of funds specified in the CDBG, HOME and other program budgets incorporated herein.

**SECTION V.** The City Auditor is further authorized to secure for his or her records a line item appropriation of each activity listing all categories incorporated budgets.

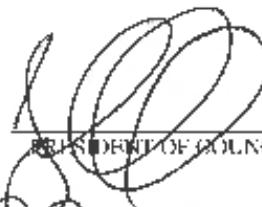
**SECTION VI.** That it is found that all actions of this Council concerning and relating to the passage of this ordinance were adopted in an open meeting of this Council and any of its committees that resulted in such formal actions were in meetings open to the public and in compliance with all legal requirements including Section 121.22 of the Ohio Revised Code.

**SECTION VII.** That this ordinance is declared to be an emergency measure, the emergency being to meet the submission deadline established by the U.S. Department of Housing and Urban Development of April 28, 2023 and to provide for the safety, health and welfare of the citizens of Lorain, provided it receives the affirmative vote of two-thirds of all members elected to Council, it shall take effect and be in force from and after the earliest period allowed by law.

PASSED: April 17, 2023

ATTEST: Brookanna Dull, CLERK

APPROVED: April 17, 2023

  
CLERK  
  
MAYOR

ENHANCING NEIGHBORHOODS AND HOUSING



## ANNUAL ACTION PLAN

FY 2023 - 2024



cityoflorain.org

Department of Building, Housing and Planning

Annual Action Plan  
2023

1

OMB Control No: 2506-0117 (exp. 09/30/2021)

2023

OMB Control No: 2506-0117 (exp. 09/30/2021)

## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The City of Lorain's Annual Action Plan (AAP) for 2023-2024 serves as the City of Lorain's fourth year of the 2020 -2024 Consolidated Plan (ConPlan).

The Annual Action Plan (AAP) is a requirement by the U.S. Department of Housing and Urban Development (HUD) and serves as the City's application for federal funding; the following are opportunities in which the City of Lorain is applying for:

- Community Development Block Grant (CDBG)
- Home Investment Partnership Program (HOME)

The AAP identifies strategies, resources, and networks to assist very low, low, and moderate-income residents through programs managed by the City of Lorain Department of Building, Housing, and Planning.

The City of Lorain's Consolidated Plan (ConPlan) outlines our five-year goals to address the needs of Low to-moderate (LMI) and Special Needs Residents. The following ConPlan goals are outlined below:

- **Goal 1:** Improve availability and accessibility of affordable housing to people of low and moderate income throughout the City of Lorain.
- **Goal 2:** Reduce Homelessness in the City of Lorain.
- **Goal 3:** Enhance the living environment for persons of low and moderate-income and special needs populations through public services, public improvement, and community and economic development.
- **Goal 4:** Expand the accessibility and coordination of social services to the City of Lorain's low- and moderate-income and special needs populations.
- **Goal 5:** Provide assistance prior to, during, and after community emergency and/or disaster events to prepare for and/or mitigate loss, protect during an event, and aid with recovery (this includes natural disasters and infectious disease outbreaks such as COVID-19 Pandemic).

The City of Lorain continues to evaluate the needs of the community in relation to the ConPlan and our AAPs.

The Community and Economic Development division manages in part CDBG, CDBG-CV funded projects including, public facility projects, public service programming, and eventually economic development programming to assist for-profit businesses.

The Housing division manages in part CDBG, HOME, and HOME-ARP through owner-occupied home rehabilitation and neighborhood revitalization programs. This Division will also spearhead the development of the HOME-ARP projects and activities that will be determined this year.

The City of Lorain continues to build and foster partnerships including but not limited to, the Lorain Metropolitan Housing Authority (LMHA), Continuum of Care (CoC), non-profit and for-profit entities, and neighborhood groups, to assist with the development, implementation, and evaluation of our programs benefiting the needs of the community.

With the assistance of our partners, the City of Lorain Department Building, Housing, and Planning (BHP) increases the quality of life through, affordable housing incentives, improvements to the built environment, addressing blighted structures by demolition, and improved public spaces.

## **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.

### **AFFORDABLE HOUSING**

Like many communities, the City of Lorain has an insufficient inventory of affordable housing available for most income tiers up to 80% Area Median Income (AMI). The majority of the City of Lorain's households fall below the HUD AMI and are disproportionately renters. Individuals who have an AMI of less than 30% are greatest at risk for homelessness and the housing available to them requires a lengthy wait list with an uncertain outcome. The City has also experienced a severe lack of housing development over the past twenty years. Affordable housing remains unattainable due to the lack of units available in the City. The City maintains its ConPlan goal of addressing the priority need for decent housing.

### **SUITABLE LIVING ENVIRONMENT**

The City of Lorain continues to seek to enhance outdoor living spaces, increase and diversify public service programming to serve the needs of the community, and learn more about our business community's needs. As the third goal in the ConPlan, the City preserves its assistance to improve the safety and livability of neighborhoods and increase access to quality public and private facilities and services.

### **EXPANDED ECONOMIC OPPORTUNITY**

In combination with other funding sources, the Department of Building, Housing, and Planning's Community and Economic Development division seeks to continue to implement, evaluate, and enhance programs to promote the expansion of programs and services available to residents. Along with understanding the business community and specific programmatic needs to eventually assist with expansion or retention.

The City will continue its partnership with LMHA, the CoC, and local nonprofits in the area to address homelessness in the community. The City received additional federal funding to provide assistance to those impacted most by the pandemic and are struggling to maintain or find affordable housing.

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

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

The most recent summary of the City of Lorain's post performance in its housing and economic development programs is included in the FY 2021-2022 Consolidated Annual Performance and Evaluation Plan (CAPER).

Activity	Quantity Served
Public Facility Activities	2
Demolition of Blight	28
Homeowner Rehabilitation	25
Homelessness prevention	150
Emergency Shelter	48
Community Enhancement Grants	
Job Training	

Table 1 - FY 2021-2022 Results at a Glance

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

Summary from citizen participation section of plan.

As a part of the Consolidated Planning process, the City of Lorain must develop an Annual Action Plan that identifies sources of funding, a statement of objectives, a description of projects, graphic distribution, monitoring of sub-recipients, and results of past efforts.

#### **PUBLIC HEARINGS**

To receive public input prior to the adoption of the Annual Action Plan, the City of Lorain shall hold a minimum of two public hearings at the conclusion of a 30-day public comment period as required by HUD.

## **PUBLIC NOTICE**

A public notice shall be published in a local newspaper of general circulation and/or posted in English and Spanish no less than ten days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comments.

The public notice shall include a summary of the proposed Annual Action Plan and all pertinent information regarding where the Annual Action Plan is available for public examination, including the location's address and hours of availability.

## **COMMENT PERIOD**

A 30 day comment period of the draft Annual Action Plan will be available for public review prior to submission to the City of Lorain City Council for final consideration and adoption.

Copies of the draft Annual Action Plan will be available for review at the following locations:

- ▶ City of Lorain Main Library, 351 W. 6th Street, Lorain, OH 44052
- ▶ South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055
- ▶ City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of the draft Annual Action Plan will be available online at [www.cityoflorain.org](http://www.cityoflorain.org).

Once the Annual Action plan has been approved by City Council and submitted to HUD, a 45-day HUD review period will commence.

### **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.

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

### **7. Summary**

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

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Lead Agency	Agency Role	Name	Department/Agency
CDBG Administrator	LORAIN	LORAIN	Department of Building, Housing and Planning
HOPWA Administrator			
HOME Administrator			Department of Building, Housing and Planning
HOPWA C Administrator			

Table 2 – Responsible Agencies

### Narrative [optional]

The City of Lorain's Department of Building, Housing, and Planning is responsible for managing both the CDBG and HOME programs. The Housing Division manages components of CDBG and HOME through down-payment assistance and owner-occupied residential full rehabilitation program. The Community and Economic Development Division manages components of CDBG and CDBG CV through public facility improvements, public service programming, and eventually economic development activities. The Finance and Compliance Division oversees budgeting, and disbursement of funds, and serves as internal auditors of federal funds to ensure all federal guidelines are followed.

### Consolidated Plan Public Contact Information

Matt Kuszniir

Director

City of Lorain, Building, Housing & Planning Department

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OMB Control No: 2506-0117 (exp. 09/30/2021)

200 W. Erie Ave, 5th Floor  
Lorain, OH 44052

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

### **1. Introduction**

The Department of Building, Housing, and Planning is active with local organizations, as part of the development of the Consolidated Plan, to enhance agency coordination and establish consensus on the needs of special populations, including individuals that are homeless, have special needs, and/or have low incomes. The ongoing conversation occurs with the CoC during the regularly scheduled monthly meetings and is made up of over 130 members of the community.

**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 Lorain, more specifically the Department of Building, Housing, and Planning has increased coordination and engagement with our local housing authorities, Lorain Metropolitan Housing Authority (LMHA).

In December 2022, the City of Lorain and Lorain Metropolitan Housing Authority received the Choice Neighborhoods Initiative (CNI) Planning Grant to increase affordable housing and spur and enhance community assets within the designated district with hopes that the Plan will alleviate the impacts of generational poverty and disinvestment in the specific wards. The CNI Plan will take about two years to complete, which will include understanding the needs of the community and compiling data to prepare for implementation.

The City of Lorain continues to be engaged through various committees and groups including but not limited to, the Lorain County Racial Equity Center, Lorain County Active Transportation Committee, FoodForward Lorain, and Lorain County Public Health.

More specifically, the Lorain County Racial Equity Center promotes economic and workforce development and addresses police and criminal justice injustices, and housing shortages among the minority and low-income population. Participants include but are not limited to, members of the Lorain County Board of Mental Health, Lorain County Public Health, and the United Way of Greater Lorain County. The forum provides a space to address racial inequalities and addressing barriers to success.

Additionally, the Department of Building, Housing, and Planning works with Lorain County Public Health to coordinate efforts on lead testing in the homes of applicants applying for the "HOME" Rehabilitation program. The Housing Division also administers CDBG funding to Erie County Health Department for the Healthy Homes Program. This Program allows eligible homeowners and tenants the opportunity to abate lead if the structure was built prior to 1978.

The City of Lorain's continued expansion of community engagement efforts has not only been notable with outcomes but also aligns with the "Goals" outlined in the Consolidated Plan (2020 - 2024).

**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 Lorain attends the monthly Continuum of Care (CoC) meetings to address the ongoing challenges of homelessness and the availability of services and shelters. In April 2021, the City of Lorain was awarded \$1.7 Million of HOME-ARP funding to address the homeless crisis in the community. As of February 2023, the HOME-ARP draft Plan was published for comment and will be submitted to HUD no later than March 1, 2023. The City will utilize the funds for supportive services, the creation of affordable housing, and the rehabilitation of shelters creating non-congregate spaces. As a part of developing the HOME-ARP Plan, there were over 30 consultations conducted to determine the level of need and the gaps in resources or aid of those who are homeless or are at the greatest risk of being homeless which include victims of domestic violence, assault, or have been trafficked. The Department of Building, Housing, and Planning will continue to be active participant in the CoC to support and assist the most vulnerable populations.

**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 Lorain does not receive or administer an Emergency Shelter Grant (ESG). The City of Lorain is and will remain involved with the Continuum of Care (CoC), which includes the Lorain County Homeless Task Force. The Lorain County Homeless Task Force CoC area assists in the operation and administration of the region's Homeless Management Information System (HMIS).

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

Table 3 – Agencies, groups, organizations who participated

1 Agency/Group/Organization	City of Lorain, Fair Housing Board
Agency/Group/Organization Type	Service-Fair Housing
<b>What section of the Plan was addressed by Consultation?</b>	Public Housing 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>	City staff meets with the City of Lorain Fair Housing Board monthly to address any Fair Housing complaints and also future affordable housing plans in the City of Lorain.
2 Agency/Group/Organization	Lorain Metropolitan Housing Authority
Agency/Group/Organization Type	Housing PHA
<b>What section of the Plan was addressed by Consultation?</b>	Other government - Local
<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 Housing Needs Homeless Needs Chronically homeless The City of Lorain meets regularly with the Director of LMHA monthly to discuss the Choice Neighborhoods Grant Planning process.

3	Agency/Group/Organization	United Way of Greater Lorain County
Agency/Group/Organization Type	Services - Housing	
	Services - Children	
	Services - Elderly Persons	
	Services - Persons with Disabilities	
	Services - Persons with HIV/AIDS	
	Services - Victims of Domestic Violence	
	Services - Homeless	
	Services - Health	
	Services - Education	
	Services - Employment	
	Services - Victims	
	Housing Need Assessment	
	Homeless Needs - Chronically homeless	
	Homeless Needs - Families with children	
	Homelessness Needs - Victims	
	Homelessness Needs - Unaccompanied youth	
	Homelessness Strategy	
	United Way of Greater Lorain County is the organization that employs the Continuum of Care Coordinator for the County. This role coordinates the monthly CoC meetings that BHP staff attend, works closely with BHP staff in the creation of the HOME-ARP plan, and provides knowledge and education about the homeless needs in the community which serves as a guide for where funding is needed.	

<b>4 Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Legal Aid Society of Cleveland Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Services-Fair Housing 	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>BHP works with members of the Legal Aid Society of Cleveland to coordinate efforts that provide services to underserved residents in the City of Lorain. BHP and Legal Aid are working together to implement a plan that streamlines the process from resident complaints to justice served when they find themselves on the wrong side of an eviction or are living in unsatisfactory conditions.</p>
<b>5 Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	EL CENTRO DE SERVICIOS SOCIALES, INC. Housing Neighborhood Organization	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>BHP works with the members of El Centro to assist residents with Spanish-speaking interpretation, and down payment assistance programs for first-time homebuyers and BHP staff recently became a member of the El Centro Finance Committee to assist members of the community with understanding the importance of taking care of their finances.</p>

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

**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	United Way of Greater Lorain County	The CoC, under the United Way of Greater Lorain County, has been an extremely valuable asset to the community since its inception in 2018. BHP is working closely with the CoC Coordinator to produce a HOME-ARP plan that will serve the most vulnerable residents in the City.

Table 4 - Other local / regional / federal planning efforts

**Narrative (optional)**

ES

**AP-12 Participation – 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**

**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)

Table 5 – Citizen Participation Outreach

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## Expected Resources

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

#### Introduction

The City of Lorain was allocated \$1,341,334.00 in Block Grant funds and \$628,402.00 in HOME funds. The City also expects to sell some land in an industrial area to businesses. This land sale will create additional program income and allow the City to do more projects benefitting the low-to-moderate-income citizens of Lorain and will create job opportunities within Lorain.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of Conplan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,344,334	164,400	2,689,357	4,198,091	1,500,000

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Program	Source of Funds	Uses of Funds	Expected Available Year 1			Expected Amount Available Remainder of Complan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:		
HOME public - federal	Acquisition Homebuyer assistance Homeowner rehab Multi-family rental new construction Multi-family rental rehab New construction for ownership TBRA						
			628,402	60,000	3,500,000	4,188,402	610,000
Other public - federal	Admin and Planning Economic Development Public Improvements Public Services						
Other public - federal	Other	0	0	0	0	0	0

**Table 6 - Expected Resources - Priority Table**

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

The City of Lorain does not have a matching requirement with HQME funds. This requirement has been waived 100% due to the City being classified as being in fiscal distress.

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

The City of Lorain is actively working towards utilizing vacant land owned by the City to address the Housing and Homelessness needs. A plan to build affordable housing for seniors is in the works and will hopefully begin the process of qualifying a developer in 2023 for this project.

**Discussion**

The City of Lorain is working diligently to spend prior-year funding as quickly as possible as well as looking at how we can best utilize and quickly spend the new allocation.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start : Year	End : Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
...	...	...	...	...	...	...	...	...

Table 7 – Goals Summary

#### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Community and Economic Development
	<b>Goal Description</b>	Public Facility Improvements and Public Service Programming
<b>2</b>	<b>Goal Name</b>	Housing
	<b>Goal Description</b>	The City will provide CDBG and HOME funding to income eligible residents, homebuyers, and homeowners. The City continues to increase the number of homeowners served under the Home Repair Program that provides roof and gutter replacement, and will expand this program to provide assistance to more homeowners needing repairs under \$4,999 per household with CDBG funds. There will be new micro-programs under the Housing repair umbrella to assist even more qualified homeowners. The City will continue to provide the full rehabilitation program to qualified homeowners with HOME dollars along with the HOME Down Payment Assistance Program to help make new homebuying affordable.

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<b>3</b>	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	This goal addresses enhancing the continuum from shelter to permanent housing for persons who are homeless. The City received \$1.7 million dollars of HOME ARP funding that will be allocated to three different activities of the four allowed. Funding will support the development of non-congregate shelter, the acquisition/development of affordable housing, and fund supportive services. Funding will be made available through an application process separate for all three activities to ensure proper policies and procedures are being followed.
<b>4</b>	<b>Goal Name</b>	Non-Homless Special Needs
	<b>Goal Description</b>	The subpopulations under special needs includes elderly, frail elderly, severe mental illness, developmentally disabled, physically disabled, persons with alcohol/other drug addictions, persons with HIV/AIDS, victims of domestic violence and other subpopulations of the special population. It is anticipated that this population will have housing and services needs addressed through the HOME ARP plan once it is reviewed and approved by HUO. Policies and procedures will be created for each qualifying activity that will provide guidance on how activities will be funded.
<b>5</b>	<b>Goal Name</b>	Program Administration
	<b>Goal Description</b>	

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

An Annual Action Plan (AAP) is required each year of the Five-Year Consolidated Plan (ConPlan). This AAP covers January 1 through December 31, 2023, and is the fourth year of the City's 2020-2025 ConPlan. The AAP implements strategies outlined in the ConPlan by addressing the housing needs of very low, low-, and moderate-income citizens of Lorain. The APP enables investors, nonprofit organizations, program administrators, elected officials, and concerned citizens to work with the City to assist existing homeowners and develop affordable housing, and community development programs. The City will also utilize the \$1.7 million of HOME-ARP to fund activities that will serve the homeless, at-risk of homeless, domestic violence and sexual assault survivors, and those living in extreme poverty where housing is unstable.

In FY 2023, the City of Lorain anticipates a budget for housing and community development of over \$1 million from federal sources. This funding will assist in preserving the existing programs that support homeowner rehabilitation, financial literacy, and first time homebuyer counseling, health homes lead abatement, and senior homeowner repair. Funding will also be provided to the Lorain Metropolitan Housing Authority (LMHA) to assist with much-needed repairs at one of the existing senior properties managed by LMHA.

#### Projects

#	Project Name
1	CDBG Administration
2	Public Service
3	Street Improvements
4	Public Facility Improvements
5	SB Clearance & Demolition
6	Home Repair Program
7	Public Housing Modernization
8	HOME Admin
9	CHDO
10	HOME Rehabilitation Loan Program
11	Down Payment Assistance Program

Table 8 - Project Information

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

All allocation priorities support the overall priorities of the Consolidated Plan and address under-served needs through owner-occupied home rehabilitation, homeless services and housing support, and collaboration with non-profit organizations. The main obstacle in addressing underserved needs is that the funding available can't support all of the needs of the community.

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$301,747
	<b>Description</b>	Admin costs (salaries/fringes, advertising, supplies, etc.) to administer the CDBG program.
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a
	<b>Location Description</b>	n/a
<b>2</b>	<b>Project Name</b>	Public Service
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Community and Economic Development
	<b>Needs Addressed</b>	Affordable and Accessible Housing for Special Need Homeless Services and Prevention Fair Housing Education and Outreach Youth Programs and Services Programs and services for low and moderate income Public Transportation Social Service Programs Programs and services for special needs residents Senior Programs and Services Housing Counselling Legal Services
	<b>Funding</b>	CDBG: \$125,000
	<b>Description</b>	open applications for public service projects
	<b>Target Date</b>	12/31/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	various locations. The goal is to approve projects for 4 organizations that benefit LMI persons and 1 organization that will provide LMI Housing benefits.
	<b>Planned Activities</b>	tbd
3	<b>Project Name</b>	Street Improvements
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Community and Economic Development
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$261,987
	<b>Description</b>	Street improvements to residential streets in LMI areas
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	tbd
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	Street improvements to residential streets in LMI areas
4	<b>Project Name</b>	Public Facility Improvements
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Community and Economic Development
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$120,000
	<b>Description</b>	open applications for a neighborhood facility improvement project and/or street improvements

	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	tbd
	<b>Location Description</b>	LMI areas
	<b>Planned Activities</b>	tbd
<b>5</b>	<b>Project Name</b>	SB Clearance & Demolition
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Community and Economic Development
	<b>Needs Addressed</b>	Elimination of Slum and Blight
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	demolition of slum/blighted properties
	<b>Target Date</b>	12/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	tbd
	<b>Location Description</b>	various location in LMI areas
	<b>Planned Activities</b>	clearance and demolition of properties deemed to be slum/blighted in LMI areas
<b>6</b>	<b>Project Name</b>	Home Repair Program
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Housing Rehabilitation/Weatherization
	<b>Funding</b>	CDBG: \$400,000

	<p><b>Description</b></p> <p>zero interest loans to low and moderate income households to repair or replace major components to their owner occupied home. Depending on income, the loans may or may not have a 20% repayment.</p>
	<p><b>Target Date</b></p> <p>12/31/2024</p>
	<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p> <p>32 LMI households</p>
	<p><b>Location Description</b></p> <p>tbd</p>
	<p><b>Planned Activities</b></p> <p>Major and minor repair to owner-occupied households that may include roof and gutters, or other repairs determined necessary to assist homeowners with major interior or exterior repairs to their home. Minor repair program to assist home-owners with minor repairs to the interior or exterior of their home.</p>
7	<p><b>Project Name</b></p> <p>Public Housing Modernization</p>
	<p><b>Target Area</b></p> <p>Ward 5 LMI</p>
	<p><b>Goals Supported</b></p> <p>Housing</p>
	<p><b>Needs Addressed</b></p> <p>Housing Rehabilitation/Weatherization</p>
	<p><b>Funding</b></p> <p>CDBG: \$100,884</p>
	<p><b>Description</b></p> <p>Rehabilitation of housing units owned/operated by the Lorain Metropolitan Housing Authority (LMHA)</p>
	<p><b>Target Date</b></p> <p>12/31/2023</p>
	<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p> <p>60 LMI households</p>
	<p><b>Location Description</b></p> <p>tbd</p>
	<p><b>Planned Activities</b></p> <p>Rehabilitation of housing units owned/operated by the Lorain Metropolitan Housing Authority (LMHA)</p>
8	<p><b>Project Name</b></p> <p>HOME Admin</p>
	<p><b>Target Area</b></p>
	<p><b>Goals Supported</b></p>
	<p><b>Needs Addressed</b></p> <p>Program Administration</p>
	<p><b>Funding</b></p> <p>HOMF: \$68,840</p>

	<b>Description</b>	costs associated to administering the 2023 HOME program
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a
	<b>Location Description</b>	n/a
	<b>Planned Activities</b>	costs associated to administering the 2023 HOME program
<b>9</b>	<b>Project Name</b>	CHDO
	<b>Target Area</b>	Ward 5 LMI
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Increased Homeownership Opportunities
	<b>Funding</b>	HOME: \$94,260
	<b>Description</b>	Community Housing Development Organization (CHDO) 15% set aside requirement for the development of affordable housing
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	tbd
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	Community Housing Development Organization (CHDO) 15% set aside requirement for the development of affordable housing
<b>10</b>	<b>Project Name</b>	HOME Rehabilitation Loan Program
	<b>Target Area</b>	Ward 2 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Housing Rehabilitation/Weatherization
	<b>Funding</b>	HOME: \$262,651
	<b>Description</b>	to provide zero interest loans to low income households to fully rehabilitate their owner occupied home

	<b>Target Date</b>	12/31/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 low income households
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	to provide zero interest loans to low income households to fully rehabilitate their owner occupied home
<b>11</b>	<b>Project Name</b>	Down Payment Assistance Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Increased Homeownership Opportunities
	<b>Funding</b>	HOME: \$262,651
	<b>Description</b>	To provide down payment assistance to low income households to purchase their first home in the City of Lorain
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 low income households
	<b>Location Description</b>	tbd
	<b>Planned Activities</b>	To provide down payment assistance to low income households to purchase their first home in the City of Lorain

## **AP-50 Geographic Distribution – 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 geographic areas of the entitlement are Citywide with a concentration in four of the eight wards in the City. The Wards of priority include Wards 2, 3, 5, and 6 which have the highest concentration of low-income and underserved residents.

#### **Geographic Distribution**

Target Area	Percentage of Funds
Ward 2 LMI	20
Ward 5 LMI	22
Ward 6 LMI	15
Ward 3 LMI	16

Table 9 - Geographic Distribution

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

In recent years, a greater percentage of federal funding (CDBG) has been allocated to homeowner rehabilitation and park improvements. The Citywide designation supports the entire City as some residents from all wards benefit from programs offered through the City due to qualifications under income guidelines and policies and procedures in place for those programs.

#### **Discussion**

The City of Lorain has been successful in the implementation of new park equipment and major improvement projects funded through CDBG. New efforts are now concentrated on building on the programs currently in place and expanding the economic development division of the City to incorporate federal funding with private investment and additional leverage dollars to enhance development in the City overall.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Lorain places a high priority on maintaining and supporting homeownership in the City. The Department of Building, Housing, and Planning (BHP) is increasing its goals to implement new programs that will support current homeowners with maintaining their homes and assist prospective homeowners with funding to purchase a home in the City. The City of Lorain also anticipates the development of Permanent Supportive Housing that will bring 62 single adult units to be built in 2023.

#### One Year Goals for the Number of Households to be Supported

Homeless	62
Non-Homeless	65
Special-Needs	0
Total	127

Table 10 - One Year Goals for Affordable Housing by Support Requirement

#### One Year Goals for the Number of Households Supported Through

Rental Assistance	30
The Production of New Units	64
Rehab of Existing Units	10
Acquisition of Existing Units	0
Total	104

Table 11 - One Year Goals for Affordable Housing by Support Type

#### Discussion

Over the past three decades, Lorain has experienced a major housing crisis in the City. About 20% of the existing homes were built prior to 1928 and 44% of the entire housing stock in Lorain is a rental. The City anticipates future partnerships with developers to bring more affordable housing to the area with an emphasis on homeownership and permanent housing.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Lorain Metropolitan Housing Authority (LMHA) is the housing authority for Lorain County. Within the City of Lorain, LMHA maintains and operates 862 public housing units. LMHA's mission is to provide safe, decent, affordable housing for persons of low income in Lorain County. LMHA provides 1,438 public housing units throughout the entire County, with 3,156 sections 8 vouchers including 117 Veterans Affairs Supportive Housing (VASH) vouchers. There are 40 Emergency Housing Vouchers and 78 project-based vouchers.

Individuals interested in applying are encouraged to submit applications in person, or online. Public housing waiting lists and wait times for public housing are pending the rate of turnover and vary based on family size and need. Currently, the typical Lorain County family will wait between three months to 2 years.

Residents of public housing and Housing Choice Vouchers can participate in the JUMP START program that assists residents with employment and self-goals.

### **Actions planned during the next year to address the needs to public housing**

LMHA will receive funding through Lorain's CDBG program to assist with repairs at one of the project-based section 8 properties that have experienced depreciation over the years.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

LMHA promotes several resident initiatives by providing training programs for family self-sufficiency (FSS) through educational entities or private sector companies that provide training. LMHA has an economic empowerment plan that includes workshops with banks and small business seminars for the residents. LMHA plans to offer resident training on HUD regulations through a tenant council. This activity broadens public housing residents' knowledge of their rights, knowledge, HUD's perspective on issues, and various resident initiatives that can be explored and implemented at various points in time.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The local PHA, Lorain Metropolitan Housing Authority, is not designated as troubled.

### **Discussion**

The City and LMHA submitted an application for the Choice Neighborhoods Planning Grant to fund the rehabilitation and revitalization of an area in Lorain that includes the current public housing complex that is in need of major upgrades. The team was awarded a grant from HUD to implement a 2-year plan for the redevelopment of areas in the 5th and 6th wards.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City of Lorain outlines the one-year goal and the specific action steps it will take in Fiscal Year 2023 to carry out the homeless strategy identified in the 2020 - 2024 Consolidated Plan and specifically the Strategic Plan section and guided by the 2020 Cleveland State University Housing Assessment (Study) and 2021 Homeless System Strategic Plan for Lorain County. Additionally, this section addresses any activities related to the supportive housing needs of non-homeless populations. The City will continue to foster inter-agency coordination with public service agencies in our community to address the homeless and other special needs.

### **Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City of Lorain prioritizes working more with the County Continuum of Care Coordinators and Committee Meetings to address the homeless. The Committee consists of housing and service providers, city and county governments, and agency representatives. The Goal of the Committee is to establish a cooperative effort leading to the development of a continuum of housing and services for homeless persons. In 2021, the City of Lorain was awarded \$1.7 Million in HOME-ARP Funding for affordable housing, TBRA, supportive services, and the creation of non-congregate shelter(s). The Housing Team is working closely with the CoC Coordinator to prepare the HOME-ARP allocation plan for the expenditure of the funds. The City of Lorain will continue to foster a relationship with the Homeless Task Force and Neighborhood Alliance and other community partners, in order to keep the residents and community leaders informed of measures for assisting the homeless within the city. The City of Lorain encourages local groups to apply for Public Service funds to increase programmatic reach. The City of Lorain will continue to expand our list of non-profit organizations and community partners serving this population.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Lorain continues to foster our relationship with various organizations providing emergency and transitional housing services throughout the City of Lorain. A primary resource is Neighborhood Alliance's Haven Center. The Haven Center is a 24-7 emergency shelter for men, women, and children. Currently, the facility offers 68 beds and has plans to expand the existing facility. The Facility offers employment referrals, vocational rehabilitation, GED courses, tickets for public transit, and assistance with applying for affordable housing.

#### **Helping homeless persons (especially chronically homeless individuals and families, families**

**with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City of Lorain will utilize the HOMF-ARP funding to provide housing, shelter, and supportive services to the qualifying population that is identified as homeless, at risk of homelessness, survivors of domestic violence, dating violence, sexual assault, and trafficking, and other individuals and households at greatest risk of housing instability. Upon HUD approval of the HOMF-ARP plan, the City will provide a notice of funding opportunity (NOFO).

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The non-homeless special needs populations include the elderly, mentally ill, developmentally disabled, physically disabled, substance abusers, and persons with AIDS or related diseases. The City of Lorain and other non-profits continuously provide various types of assistance, primarily through supportive services, to persons with special needs in the community. These agencies include but are not limited to Neighborhood Alliance; Catholic Charities; Second Harvest Food Bank; Lorain County Urban League; and El Centro De Servicios Sociales to name a few. The City will continue to reduce homelessness by supporting non-profit service providers that offer self-sufficiency training, medical care, workforce development, mental health counseling, case management, education services, and other activities to prevent homelessness. Additionally, this will be supported through various other homeownership assistance programs such as down payment assistance and financial literacy.

### **Discussion**

The City of Lorain will continue to offer assistance, advice, and coordination with the community agencies that provide day facilities, case management, workforce development, vocational tools, and other homeless services. The City of Lorain plans to award various non-profit agencies with available public service funding to provide services such as workforce development, youth services, legal services, and other programming and services that may provide supportive services to the homeless and non-homeless special needs populations.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The City of Lorain is committed to affirmatively furthering fair housing and overcoming identified barriers to affordable housing. These efforts have resulted in the enhancement of the Fair Housing Board, the development of specific goals and objectives to overcome barriers to affordable housing, and support for projects that counter the negative effects of public policies.

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

The City of Lorain utilizes many strategies to remove barriers to affordable housing. The City will implement the Down Payment Assistance Program to assist first time homebuyers. Additionally, the City recently updated the Zoning and Land Use code which removed previous barriers to development. The City of Lorain adopted the Ohio Board of Building Standards recommendation of the Ohio Building Codes (OBC), Ohio Mechanical Codes (OMC), Ohio Plumbing Codes (OPC), and the ICC International Building Code. These codes are designed to set forth minimum standards for health, safety, and welfare. The City of Lorain is working directly with private developers and non-profit housing developers to increase the amount of affordable housing.

Rental Registration is required by all landlords and is designed to protect renters from absentee and unresponsive landlords. By requiring a local contact for a point of service, the legal authority of the City of Lorain has increased the power to keep landlords complying with fair housing laws and the need to provide a safe and sanitary environment. Partial ordinance copied below:

Per City of Lorain Codified Ordinance No. 92.21

- Rental Housing Licenses are valid for one year from the issuance date, or whenever ownership changes. Licenses are non-transferable.
- The owner of a rental dwelling unit who does not reside in The City of Lorain shall designate an agent who in addition to the owner shall be responsible for the operation of the Rental Dwelling Unit and who may accept service of process and official notices issued by The City of Lorain on behalf of the owner.
- An official notice or service of process issued to a designated agent shall be deemed as served or delivered upon the owner of a record of the rental dwelling unit. Failure to maintain a rental dwelling unit or to maintain any requirements regarding licensure shall be grounds for revocation of an existing Housing License or denial or issuance of a Housing License. A designated agent shall be an individual person who resides in The City of Lorain, shall provide a valid address within the City, and promptly notify the Chief Building Official of any change in

address or other change in status.

**Discussion:**

The key point of this section is that the City of Lorain has made and continues to make conscious efforts to update the Building Code, Zoning Code, Land Use, CRA, and other local provisions. The City of Lorain's improvements will make the City more attractive for housing and development.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City of Lorain continues to place a high priority on Fair Housing. Seven members make up the Fair Housing Board that will undergo training and support to ensure residents are aware of their rights under Fair Housing and to utilize the system put in place to assist them in the fight against discrimination.

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

The City will address the obstacles to meeting the needs of the underserved by fostering deeper relationships with nonprofits and community members to provide an opportunity for funding through an application process. Additional funding through HOME-ARP will directly address the needs of the underserved through supportive services, housing, and the creation of non-congregate shelters.

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

The City encourages development in the City through a vacant land program and funding opportunities for qualified developments. The City continues to work with organizations that desire to bring affordable housing to the area.

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

The City provides funding to the Erie County Healthy Homes Program that abates lead hazards in the homes of owners and tenants. Priority is placed on homes where children under 6 years of age live.

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

The City of Lorain continues and plans to provide resources such as housing, financial literacy, housing counseling, workforce development, youth programming, and other public services to promote self-sufficiency. By providing and expanding these resources the City of Lorain will continue to work with partner agencies to assist families that fall within the poverty guidelines.

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

Because many of the clients served through the local City programs are also assisted by other social service agencies, the City maintains a good network of communication and referral with these other entities. Staff from the local partners frequently refer clients to one another in order to best meet the needs of the citizen or household. The City of Lorain more specifically the Department of Building, Housing, and Planning staff continues to serve on the Continuum of Care in order to assess the homeless needs of Lorain County and collaborate on homeless programs.

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

The local nonprofit organizations in Lorain, such as El Centro de Servicios Sociales, Lorain Metropolitan Housing Authority, United Way, Lorain County Goodwill, Lorain County Habitat for Humanity, Lorain County Community Action Agency, the Lorain County Urban League, Big Brothers Big Sisters, and Neighborhood Alliance provide a number of affordable housing and supportive services. These organizations typically have a specific target population that they serve, and accordingly, possess a level of knowledge and expertise that is invaluable. The continuation and expansion of such services by aggressively seeking additional funding will be encouraged over the next year. In addition, better coordination between these agencies and with the public and private sector organizations will continue to be a high priority.

The City of Lorain has prioritized creating and fostering relationships with these organizations and agencies by working closely with the County's new Continuum of Care Coordinator and attending monthly CoC meetings.

#### **Discussion:**

The City of Lorain is committed to assisting individuals and families by providing services and resources to mitigate poverty-related barriers.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

#### Introduction:

The City of Lorain utilizes CDBG funding to benefit low to moderate income residents of the City of Lorain and also utilizes HOME funding to benefit low income residents with housing.

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

##### Reference 24 CFR 91.220(l)(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	164,400
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>164,400</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.	75.00%

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture is the regulatory requirement under which all or a portion of the direct HOME subsidy must be repaid to the City if the property is sold during the affordability period.

The City has elected Recapture rather than Resale restrictions and has adopted the "reduction during affordability period" method permitted by 92.254(a)(5)(ii)(A)(2). Upon the completion of the affordability period, the City will reduce the amount of recapture by an equal amount (20% of the original loan amount) each year during the affordability period.

Example: If the number of HOME funds invested is \$10,000 and the homebuyer sells the property at the end of year 3, \$6,000 will be reduced from the original investment and only \$4,000 will need to be repaid.

The recapture amount is limited to the number of net proceeds of the sale, which is defined as the sale price less the balance due on superior secured debt and closing costs incurred by the Homebuyer at sale or transfer.

If there are no net proceeds of sale or the net proceeds are insufficient to repay the Recapture Amount, then the entire net proceeds, if any, will be recaptured and retained by City to satisfy both this Agreement and the Loan. In the event the net proceeds are less than the outstanding loan balance, the City reserves the right to determine whether the sales price is comparable to the sales price in an arms-length transaction for a similar unit and to evaluate the closing cost being charged to the Homebuyer to ensure they are reasonable and customary.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City of Lorain does not have plans to purchase units with HOME funds in the year 2023.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

With our current programs, the City of Lorain does not have plans to refinance existing debt secured by multifamily housing.

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## **Attachments**

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## Citizen Participation Comments

### City of Lorain

#### 2020/2024 Consolidated Plan Citizen Participation Plan

The City of Lorain recognizes that citizen participation is a very important part of the consolidated planning process. To better guide the City's outreach in gaining citizen input, the City has developed a Citizen Participation Plan. The City of Lorain Citizen Participation Plan is designed to create opportunities for citizens to be involved in the development of the consolidated plan, annual action plans, the implementation of substantial amendments, and annual performance reporting.

#### Introduction

In accordance with 24 CFR Section 91.105, the City of Lorain Department of Building, Housing, and Planning has prepared a Citizen Participation Plan to explain what opportunities are available to all residents, in addition, to how the public can participate in the process of preparing the city's Consolidated Plan. The City of Lorain Department of Building, Housing, and Planning is responsible for administering the Citizen Participation Plan.

The overall goal of the Consolidated Plan is to utilize federal, state and local funding in a coordinated manner to promote the development of viable communities. Viable communities are described as meeting the residents' needs in regards to affordable and decent housing; a safe and suitable living environment; and adequate economic opportunities particularly for low- and moderate-income persons.

Citizen participation will be encouraged during the development of the consolidated plan, annual action plans, any substantial amendments, and the performance report by providing notice to residents and local organizations through various media methods. The Citizen Participation Plan sets forth the policies to be used for citizen participation and outlines the procedures used to encourage the participation of all residents of the City of Lorain – especially low-income residents, minorities, non-English speaking residents, the disabled and persons with HIV/AIDS.

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## Five-Year Consolidated Plan

### ***Public Hearings***

In accordance with 24 CFR Section 91.106, the City of Lorain will host, at a minimum, two public hearings during the development of the Consolidated Plan, prior to its proposed adoption by City Council for submission to HUD.

### ***Public Notice***

The City will publish a notice of availability of the Consolidated Plan and corresponding Annual Action Plan for public review in a newspaper of general circulation and in any widely disseminated smaller publications or posting serving low-income residents, minorities, non-English speaking residents, the disabled and persons with HIV/AIDS. The date of publication will be the beginning of a 30-day public comment period at the end of which a public hearing on the Consolidated Plan and corresponding Annual Action will also be held.

The notice of availability shall include a summary of the Consolidated Plan as well as a summary of those sections of the Consolidated Plan that concern CDBG and HOME funds. The summary will describe the contents and purpose of the Consolidated Plan, and will include a list of locations where copies of the entire Consolidated Plan may be examined.

### ***Comment Period***

Prior to the City Council approval of the Consolidated Plan, a 30-day public comment period shall be held as required by HUD.

The City shall publish a draft of the Consolidated Plan (including the corresponding Annual Action Plan) to be available during the 30 day comment period so that citizens have an opportunity to review the Consolidated Plan prior to adoption.

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During the 30-day comment period, the Department of Building, Housing, and Planning will receive written comments on the Consolidated Plan from the public and will later include those comments and the City's responses in the final publication of the Consolidated Plan.

Copies of the draft Consolidated Plan will be available for review at the following locations:

- City of Lorain Main Library, 351 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44066
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 6<sup>th</sup> Floor, Lorain, OH 44052

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of the draft Consolidated Plan will be made available online at [www.cityoflorain.org](http://www.cityoflorain.org).

The City of Lorain City Council, as the elected authority of the citizens of the City of Lorain, is responsible for the Consolidated Plan. All public comments shall be reviewed and taken into consideration by the Council. The City Council authorizes final publication of the Consolidated Plan and Annual Action Plan and submission of the Consolidated Plan and Annual Action Plan to HUD.

#### Submission of the Plan

Following approval by the City Council, the Consolidated Plan will be submitted to HUD no later than 60 days after the annual allocations are announced. Upon submission, a 1 certification of compliance will be included.

#### Annual Action Plan

Each program year, as a part of the consolidated planning process, the City of Lorain must develop an Annual Action Plan that identifies sources of funding, statement of

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objectives, description of projects, graphic distribution, monitoring of sub-recipient, and results of past efforts.

#### ***Public Hearings***

To receive public input prior to the adoption of the Annual Action Plan, the City of Lorain shall hold a minimum of two public hearings at the conclusion of a 30-day public comment period as required by HUD. Due to the ongoing COVID-19 Pandemic, HUD recognizes the need to limit public gatherings and therefore is allowing public hearings to be held virtually through August 16, 2021.

#### ***Public Notice***

A public notice shall be published in a local newspaper of general circulation and/or posted in English and Spanish no less than ten days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

The public notice shall include a summary of the proposed Annual Action Plan and all pertinent information as to where the Annual Action Plan is available for public examination, including the locations address and hours of availability.

#### ***Comment Period***

A 30-day comment period of the draft Annual Action Plan will be established for public review prior to submission to the City of Lorain City Council for final consideration and adoption.

**Copies of the draft Annual Action Plan will be available for review at the following locations:**

- City of Lorain Main Library, 361 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052

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Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of the draft Annual Action Plan will be made available online at [www.cityofflorida.org](http://www.cityofflorida.org).

Once the Annual Action plan has been approved by City Council and submitted to HUD, a 45 day HUD review period will commence.

#### Substantial Amendments

If there are changes because of legislative authority or the Department of Housing and Urban Development (HUD) causes changes in rules, regulations and guidelines which impact the Community Development Block Grant Program, said changes will supersede any/all of the provisions contained in this Citizen Participation Plan. In addition, any general or substantial amendment to any portion of the Consolidated Plan will follow HUD prescribed notice and comment period requirements.

Prior to the submission of any substantial change in the proposed use of funds, citizens will have reasonable notice of, and the opportunity to comment on, the proposed amendment using the citizen participation methods outlined in this Citizen Participation Plan and/or other methods that result in effective notice and comment. Substantial amendments may be made up to six (6) times per program year.

The following actions necessitate a substantial amendment to the Consolidated Plan and/or Annual Action Plan:

- The elimination or addition of an activity originally described in the Annual Action Plan and/or Consolidated Plan.
- A change in the purpose of an activity originally described in the Annual Action Plan and/or Consolidated Plan, such as a change in the type of activity or its ultimate objective (i.e., a change in a construction project from housing to commerce).

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- A meaningful change in the location of an activity originally described in the Annual Action Plan and/or Consolidated Plan.
- A change that increases or decreases funding or the cost of an activity, project or program by more than 25 percent of the funds that were originally allocated for that activity, project or program originally described in the Annual Action Plan. This does not include activities, projects or programs that are completed under budget by more than 60 percent. In such case, the unspent balance may go to existing or previously approved activities.
- A change required by Federal law or regulation.

#### **Public Hearings**

The City shall hold a minimum of one public hearing for public input on any Substantial Amendment. Prior to amending its Consolidated Plan for a new activity or a substantial change, the City will publish a notice of the substantial change in area newspapers. The public notice shall be published in a local newspaper of general circulation no less than ten days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

#### **Comment Period**

The public shall be given an opportunity to comment on any Substantial Amendments made to the City's Consolidated Plan or Annual Action Plan. After proper notice is given, a 30 day public review period will be required in order to obtain public comment prior to submission to HUD.

The public comment period for the HOME-ARP Allocation Plan as part of any Substantial Amendment shall be at least 15 calendar days.

Copies of draft Substantial Amendments will be available for review at the following locations:

- City of Lorain Main Library, 351 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44056

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- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 6<sup>th</sup> Floor, Lorain, OH 44052

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of draft Substantial Amendments will be made available online at [www.cityoflorain.org](http://www.cityoflorain.org).

#### **COVID - 19**

Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, HTF, HOPWA or ESG funds.

#### **Public Hearings**

To receive public input prior to the adoption of the Annual Action Plan or a Substantial Amendment, the City of Lorain shall hold a minimum of one public hearing at the conclusion of a 5-day public comment period as required by HUD.

#### **Public Notice**

A public notice shall be published on the City of Lorain's website, Facebook, and the Lorain County website no less than five days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

Due to the "State of Emergency", all public hearings will be virtual. The Virtual Public Hearing will be live - streamed via YouTube (Lorain TV20) and Spectrum Cable Channel 1025. To participate and ask questions please call 440-204-2690.

The public notice shall include a summary of the proposed Annual Action Plan and/or Substantial Amendment and all pertinent information as to where the Annual Action Plan or Substantial Amendment is available for public examination, including the locations, address and hours of availability.

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#### **Comment Period**

A 6 day comment period of the draft Annual Action Plan or Substantial Amendment will be established for public review prior to submission to HUD for approval.

Copies of the draft Annual Action Plan or Substantial Amendment will be available for review on the City of Lorain's website.

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups.

Once the Annual Action plan has been submitted to HUD, a 45 day HUD review period will commence.

#### **Performance Reports**

Each year the City will issue a Performance Report showing the progress it has made in carrying out its Strategic Plan and its Annual Action Plan.

The Performance Report, or the Consolidated Annual Performance and Evaluation Report (CAPER), will include a description of the resources available, the investment of those resources, where those resources were spent geographically, persons assisted (including the racial and ethnic status of persons assisted), actions taken to further fair housing, and other actions indicated in the Strategic Plan and the Annual Action Plan. The City must send HUD a CAPER by March 30th or within 90 days of the close of the program year. The City of Lorain's program year begins on January 1 and ends on December 31.

#### **Public Hearings**

The City will hold a minimum of one public hearing to consider any comments or views of citizens in relation to the published Performance Report. Due to the ongoing COVID-19 Pandemic, HUD recognizes the need to limit public gatherings and therefore is

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allowing public hearings to be held virtually through August 18, 2021. A public notice shall be published in a local newspaper no less than ten days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

#### **Comment Period**

The City will receive comments and make all Performance Reports available to the public at least 15 days prior to submission to HUD. The City will consider any comments or views of citizens received in writing or orally at public hearings in preparing the final version of Performance Reports.

A summary of these comments will be attached to the Performance Report, upon completion of the final version to be submitted to HUD. HUD conducts a 30 day review of the Performance Report after submission.

Copies of the draft CAPER Plan will be available for review at the following locations:

- City of Lorain Main Library, 361 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homestead Drive, Lorain, OH 44058
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain, OH 44052

Upon request, the Department of Building, Housing, and Planning will provide a reasonable number of additional copies to citizens and groups. In addition, electronic copies of the draft CAPER Plan will be made available online at [www.cityoflorain.org](http://www.cityoflorain.org).

#### **Complaints/Comments/Grievances**

The City will provide a timely and substantive response to all written complaints. Upon receipt of a written comment, the City will prepare and forward a written response (including clarification and/or corrective action as needed) and any other related documents will remain on file in the City of Lorain Department of Building, Housing, and Planning. All written complaints/Comments should be addressed to City of Lorain Department of Building, Housing, and Planning, 200 W. Erie Avenue, 5<sup>th</sup> Floor, Lorain, OH 44052.

\*Updated 11/02/2021

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### **Public Hearings/Public Notices**

The City of Lorain will host, at a minimum, two public hearings annually during the Five-Year Consolidated Plan's term. The first public hearing will announce the availability of technical assistance and funding for current program year. A second public hearing will be held later in the program year, once the draft plan is ready for public review, to solicit comments on the strategies and proposed use of funds and to review program performance. Public hearings will be conveniently scheduled and located for people who will benefit from program funds, and will be accessible to persons with special needs.

Under circumstances where an in-person public hearing is not viable, virtual meetings will be held. These virtual public hearings will follow the same structure as an in-person public hearing. Virtual hearings will be held using an accessible software.

The City of Lorain is required to provide adequate advance notice of public hearings. There shall be advance public notice once a federally required document is available for public review, such as the proposed Annual Action Plan, Five-Year Consolidated Plan, any proposed Substantial Amendment to the Annual Action Plan or Five-Year Consolidated Plan, and the Annual Performance Report. In addition, there shall be advance public notice of all public hearings, and public meetings related to the funds or planning process covered by this Citizen Participation Plan.

A translator will be provided based on prior written request of an individual or organization representing non-English speaking persons. Written requests must be made to the City of Lorain Department of Building, Housing, and Planning, a minimum of five business days prior to hearing date.

To ensure that adequate advance notice of public hearings is provided to citizens or other interested parties, the City will take the following actions:

\*Updated 02/02/2022

\* 0 of 13

- The City will publish a notice of public hearing in one or more newspapers of general circulation ten days prior to the day of the public hearing, to allow interested parties to attend.
- Notices will be printed in readable size and placed in the general section of the newspaper. The notices will provide complete summary information on the purpose of the meeting, the date, time, and location. They shall provide a name and telephone number for persons who may have questions about the meeting / hearing, along with information regarding accessibility for the disabled.
- This information will also be disseminated at appropriate City libraries, government offices and public spaces. If public spaces are unavailable, information will always be available on the City of Lorain's website ([cityoflorain.org](http://cityoflorain.org)) and at City Hall.

#### Access to Information

Citizens, public agencies and other interested parties, including those most affected, will have the opportunity to receive information, review and submit comments on any proposed submission concerning any of the following documents:

- The draft and final Annual Action Plans
- The draft and final Five-Year Consolidated Plan
- The draft and final Substantial Amendments to either an Annual Action Plan or the Five-Year Consolidated Plan
- Annual Performance Reports
- The Citizen Participation Plan

Copies of the previously identified documents will be made available at advertised public buildings and upon request from the City of Lorain Department of Building, Housing, and Planning.

All correspondence, records, and minutes of public hearings will be retained in the Department of Building, Housing, and Planning. All input received through, or in association with, public meetings and workshops will be retained in the Department of

\*Updated 12/02/2022

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Building, Housing, and Planning. Any pertinent information such as written proposals from a citizens group, etc., will be presented to the Building, Housing, and Planning staff for review and consideration. If assistance in reading or obtaining program records is needed, the Department of Building, Housing, and Planning should be contacted at 440-204-2020 or interested parties can access records at the Department of Building, Housing, and Planning at 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain, Ohio 44062. Interested parties may also access any of the program documents at the City of Lorain website, [www.cityoflorain.org](http://www.cityoflorain.org).

#### **Technical Assistance**

Technical assistance will be provided to citizens, citizen groups, nonprofit organizations and agencies that need such assistance in developing project proposals. Such assistance is available upon request from the Department of Building, Housing, and Planning. Anyone needing technical assistance should contact the City of Lorain Department of Building, Housing, and Planning at 440-204-2020.

#### **Anti-Displacement**

The City does not have, nor does it anticipate funding any activities that will displace any resident or businesses. If displacement does occur, the residents or businesses displaced would be entitled to compensation and / or assistance under applicable federal laws. Should the need for displacement ever arise, the City will officially notify the residents or businesses expected to be displaced as soon as practicable following approval of the activity. The notice will include a description of the proposed action, a discussion of how the resident or business owner might be affected and information concerning their rights and benefits.

#### **Use of the Plan**

The City of Lorain will follow this Citizen Participation Plan in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan, Annual Action Plan and the Performance Report.

\*Updated 12/02/2020

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For more information regarding the Consolidated Plan or to submit your comments: Inquiries and complaints concerning the Consolidated Plan, any amendments, or the performance reports, can be conveyed by contacting the City staff at:

Lorain Consolidated Plan Comments  
Department of Building, Housing, and Planning  
200 West Erie Avenue, 5<sup>th</sup> Floor  
Lorain, OH 44052  
Telephone: (440) 204-2920  
Fax: (440) 204-2080

Complaints and related comments on the programs may also be offered at the public hearings. Written responses to all written complaints may also be made to the Columbus, Ohio Office of the U.S. Department of Housing and Urban Development (HUD) at the following address:

U.S. Department of Housing and Urban Development  
Community Planning and Development Division  
Pittker Federal Building  
200 North High Street, 7th Floor  
Columbus, OH 43215  
Telephone: (614) 480-5737  
Fax: (614) 280-6173

Plan approved by:



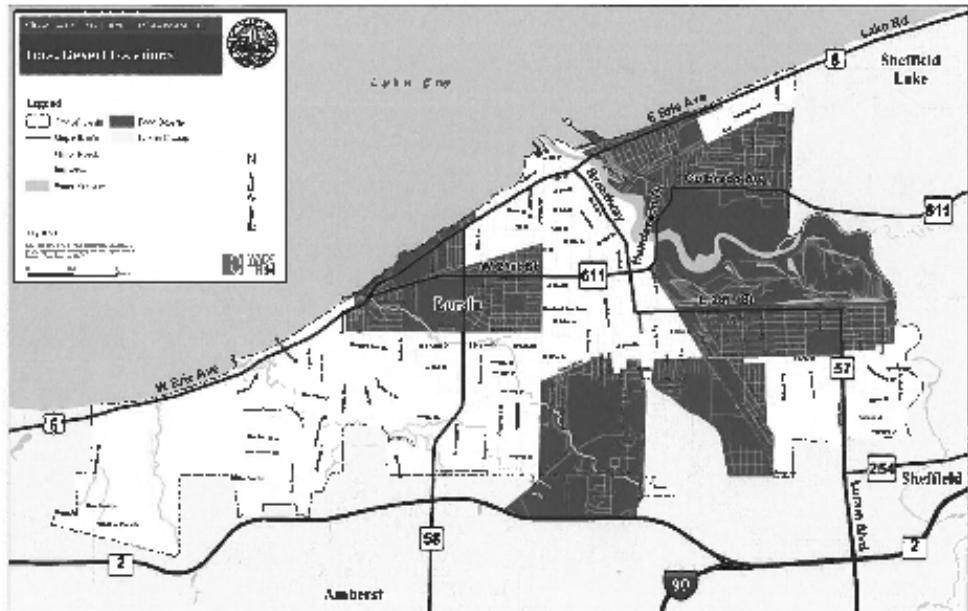
Matthew Kuszniir, Director

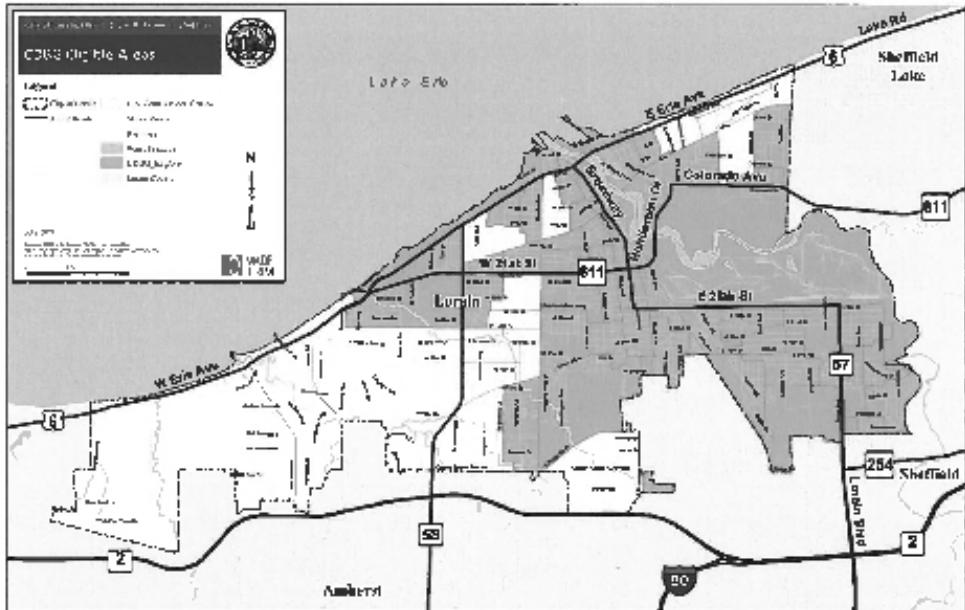
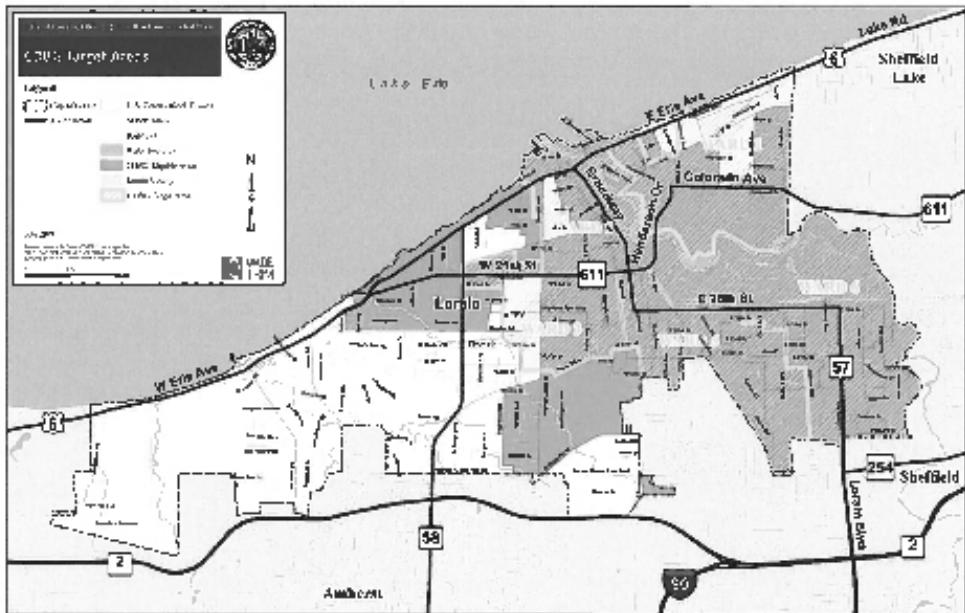
\*Updated 12/01/2027

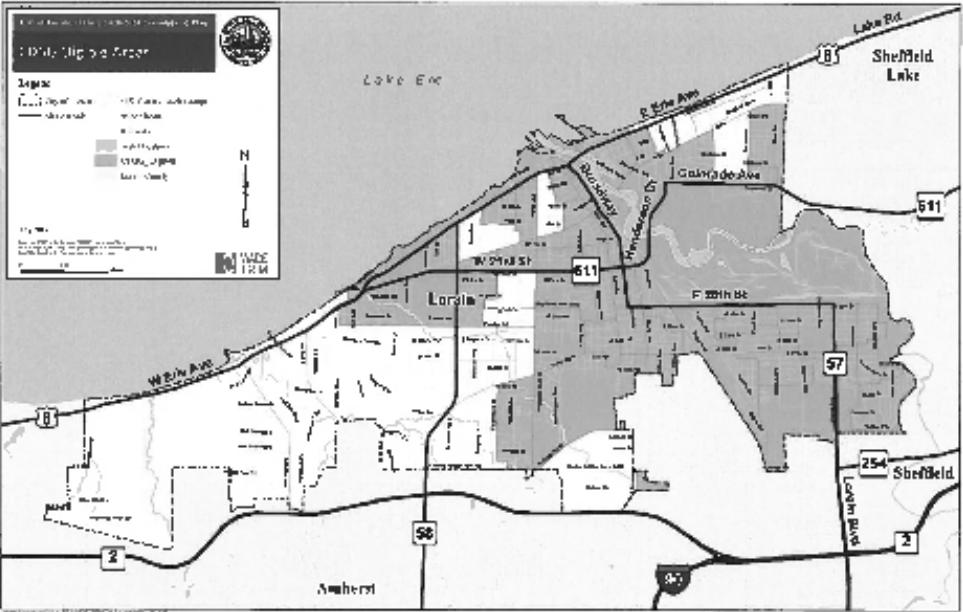
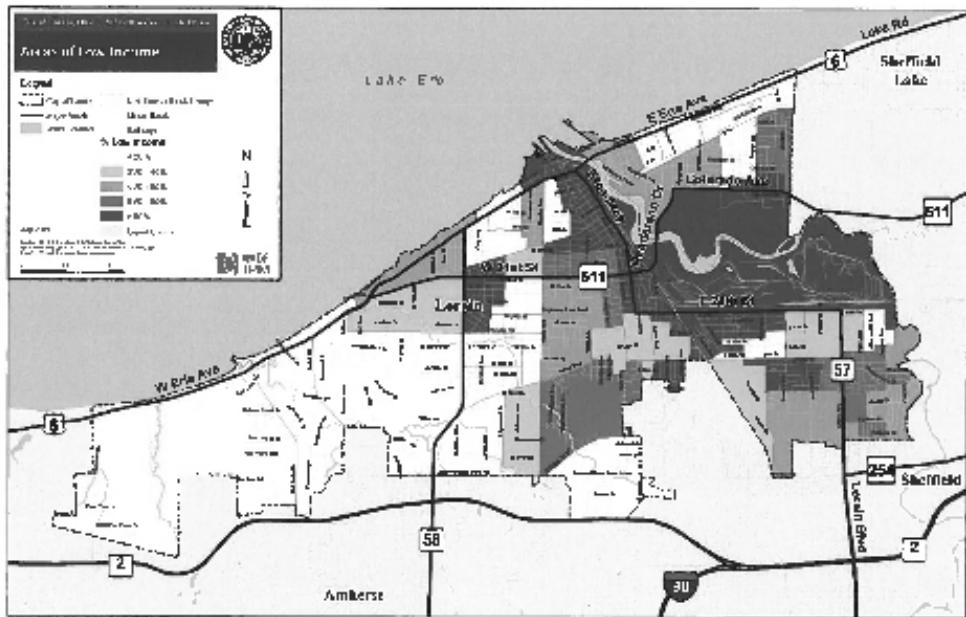
13 of 13

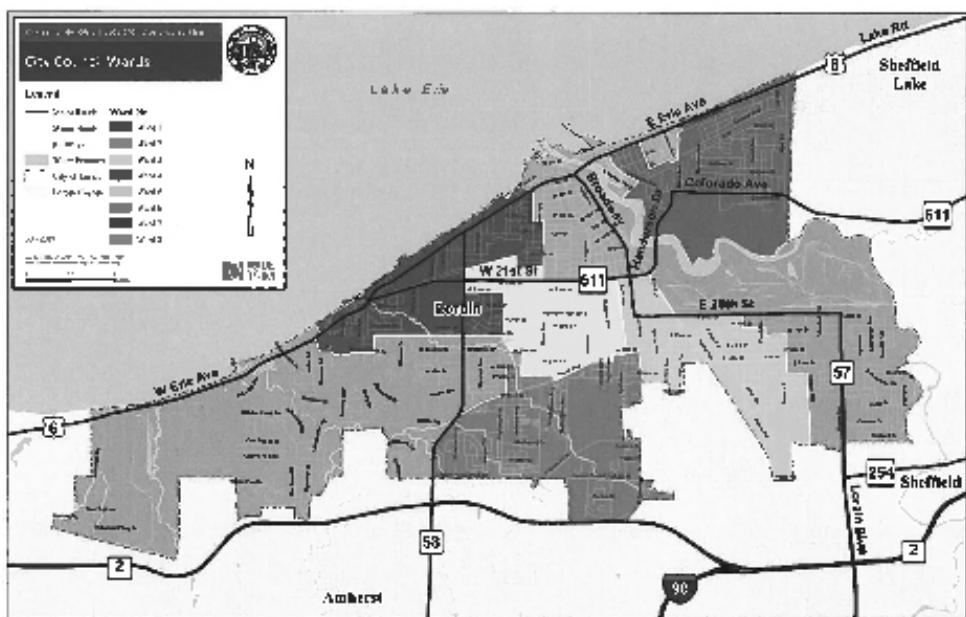
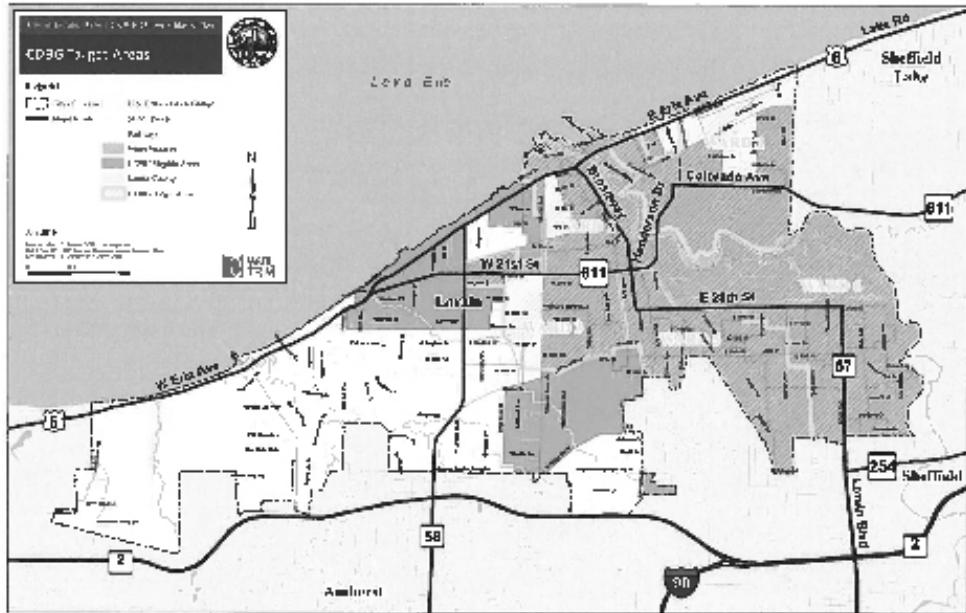


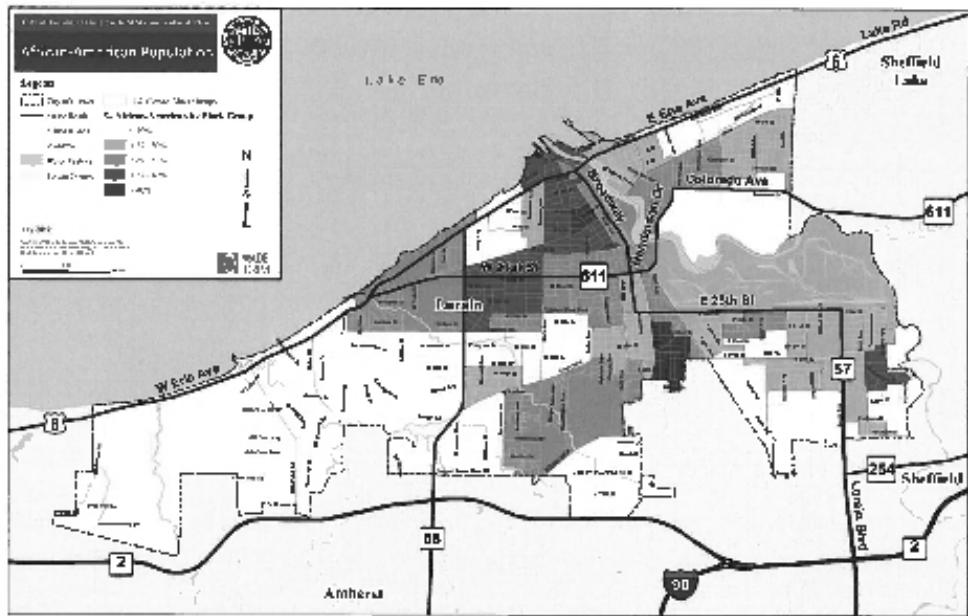
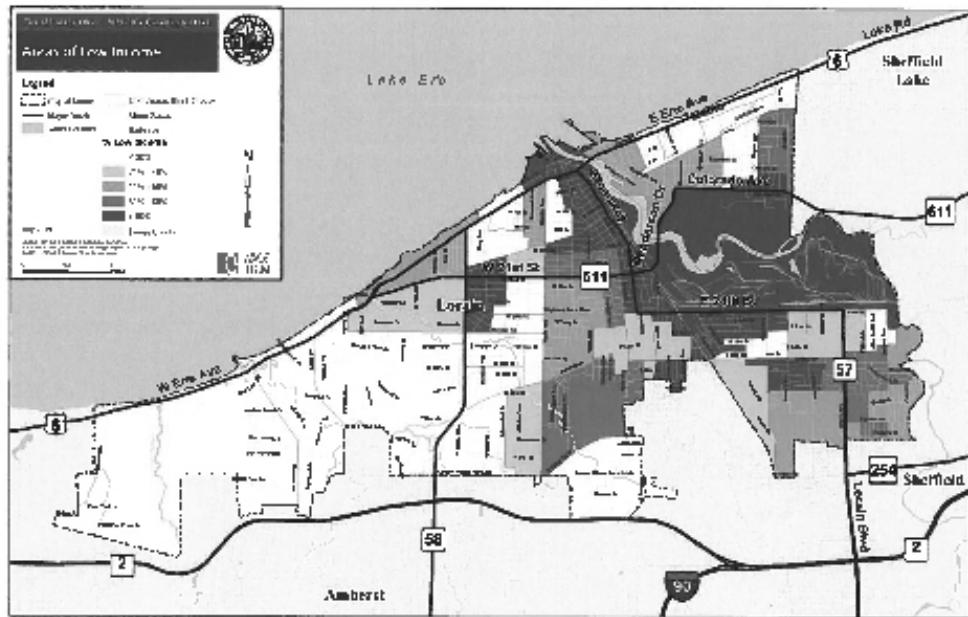
## Grantee Unique Appendices

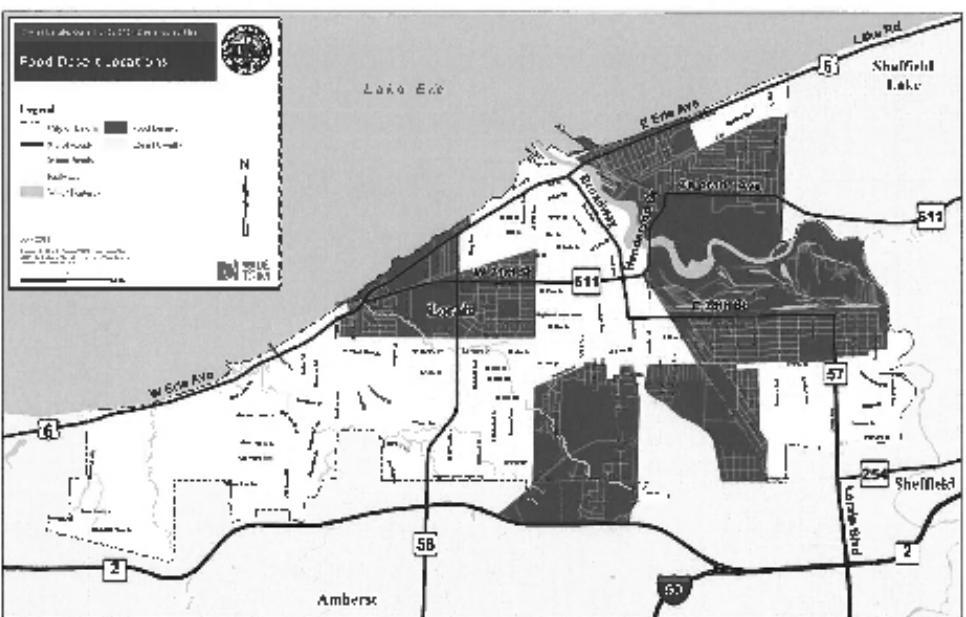
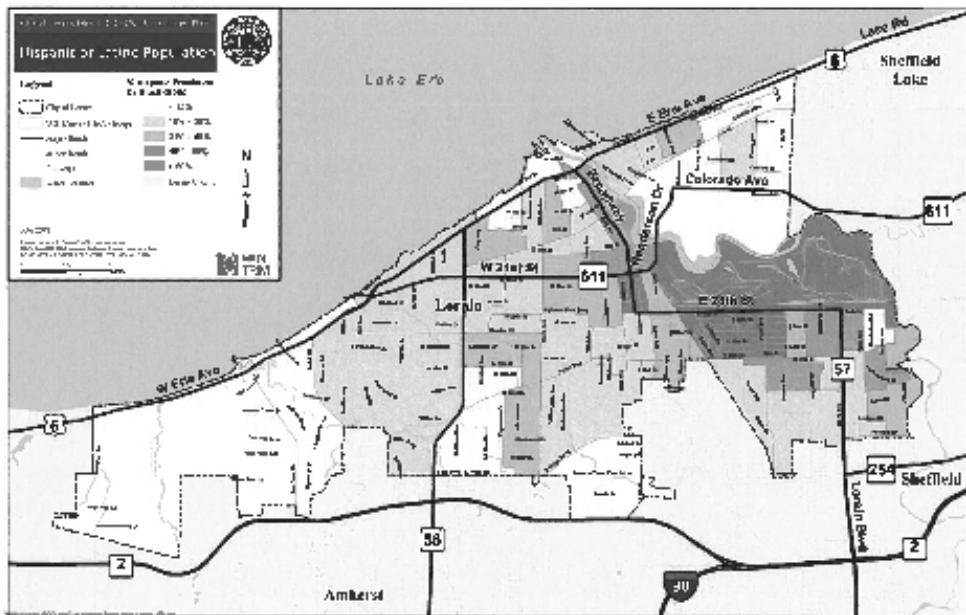


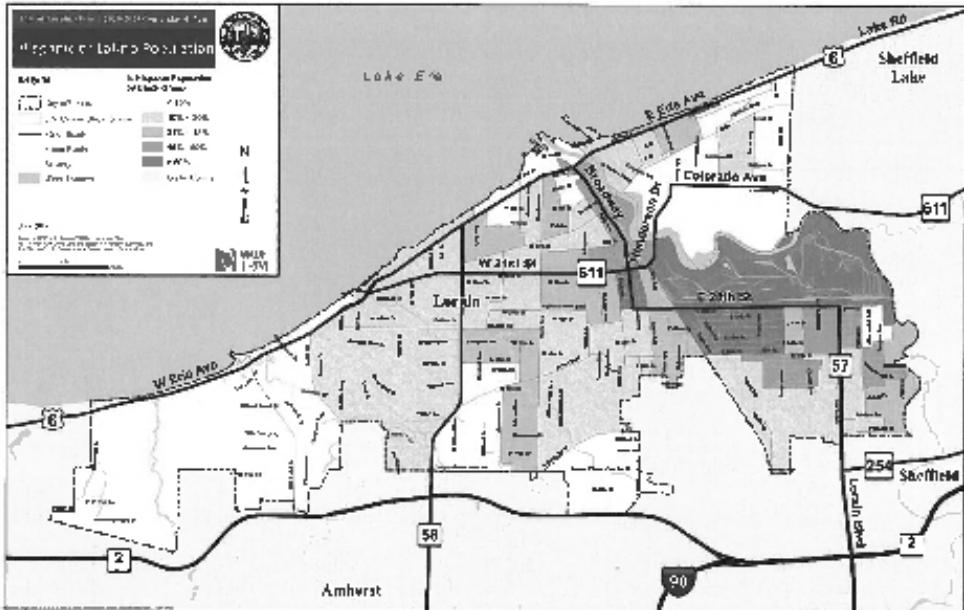
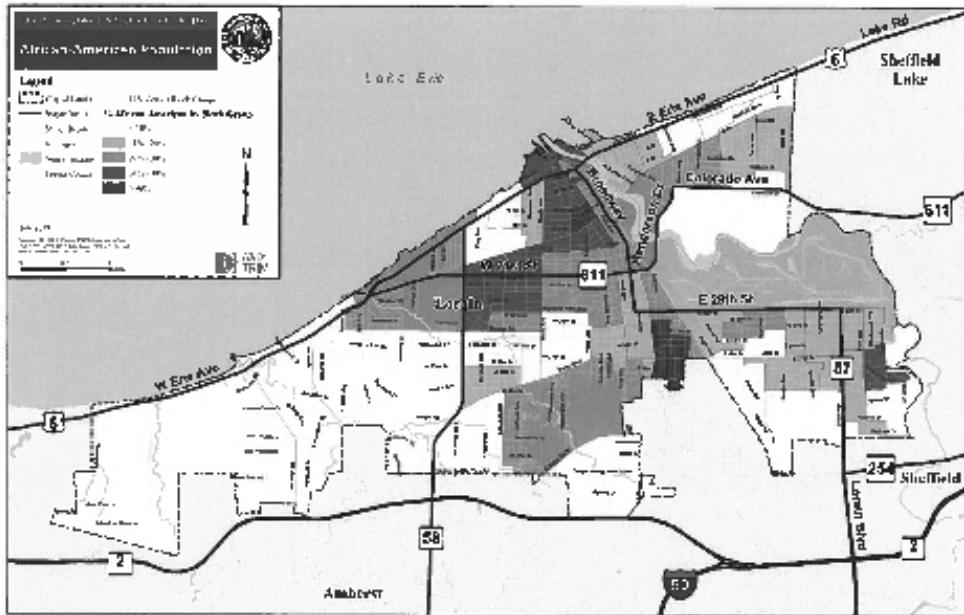


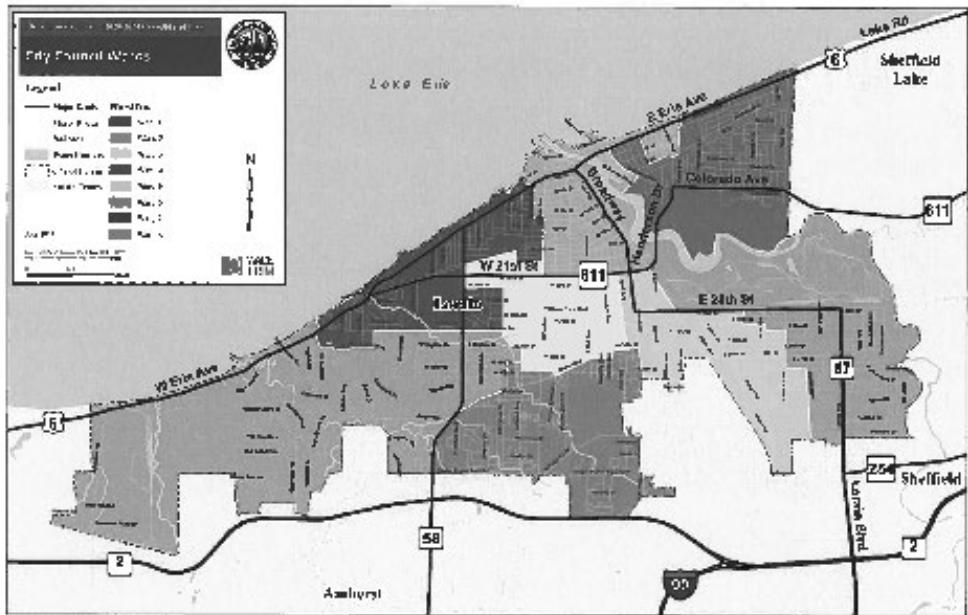














## CITY OF LORAIN

### City Council Regular Meeting

10. I.

Meeting Date: 04/17/2023

Submitted by: Hannah Kiraly, Program Manager

#### AGENDA ITEM DESCRIPTION OR LEGISLATION TITLE

**AN ORDINANCE APPROVING THE CITY OF LORAIN'S PROGRAM YEAR 2023 CDBG AND HOME ONE-YEAR ACTION PLAN AND AUTHORIZING THE MAYOR TO SUBMIT FOR FINANCIAL ASSISTANCE UNDER THE HOUSING AND COMMUNITY DEVELOPMENT ACT OF 1974, AS AMENDED, AND THE CRANSTON GONZALEZ NATIONAL AFFORDABLE HOUSING ACT OF 1990, AS AMENDED, AUTHORIZING THE SAFETY/SERVICE DIRECTOR TO ENTER INTO ALL CONTRACTS AND AGREEMENTS TO ACCEPT FINANCIAL ASSISTANCE, APPROPRIATING THE FUNDS, AND ESTABLISHING THE INDIVIDUAL ACCOUNTS CONSISTENT WITH ALL ATTACHED BUDGETS; AND DECLARING AN EMERGENCY.**

#### PURPOSE AND BACKGROUND

The City of Lorain has prepared a One-Year Action Plan to implement the goals and objectives found in the Five-Year Consolidated Plan to be able to administer CDBG and HOME programs.

#### RECOMMENDATION TO COUNCIL:

Recommend a motion to waive the three reading rule and consider for passage.

#### Attachments

Ordinance  
Action Plan 2023

#### Form Review

Inbox	Reviewed By	Date
M. Kusznir	Matt Kusznir	04/12/2023 01:28 PM
Washington	Sanford Washington	04/12/2023 01:44 PM
Mayor Bradley	Jack Bradley	04/12/2023 02:34 PM
P. Riley	Michele Beke	04/13/2023 02:04 PM
Form Started By: Hannah Kiraly		Started On: 04/12/2023 12:13 PM
Final Approval Date: 04/13/2023		

VOTE ON PASSAGE			
	AYE	NAY	
	AYE	NAY	
Fallis	✓		Nutt <i>Absent</i>
Dimochia	✓		Moon ✓
Springowski	✓		Carlon ✓
Henley	✓		Shawver ✓
Kempton	✓		Thomsberry ✓
Carter	✓		Arredondo



## Grantee SF-424's and Certification(s)

OMB Number: 4040-0004  
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424			
<b>*1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>*2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision <small>* If Revision, select appropriate [checkbox]:</small> <input type="checkbox"/> Other (Specify): _____	
<b>*3. Date Received:</b> _____		<b>4. Applicant Identifier:</b> _____ <b>City of Lorain, Ohio</b>	
<b>5a. Federal Entity Identifier:</b> _____		<b>5b. Federal Award Identifier:</b> _____ <b>M-23-MC-39-0220</b>	
<b>State Use Only:</b>			
<b>6. Date Received by State:</b> _____		<b>7. State Application Identifier:</b> _____	
<b>8. APPLICANT INFORMATION:</b>			
<b>*a. Legal Name:</b> <b>City of Lorain, Ohio</b>			
<b>*b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <b>34-6001700</b>		<b>*c. DUNS:</b> <b>JK3XXKMD0BYLL7</b>	
<b>d. Address:</b>			
<b>* Street:</b> <b>200 West Erie Avenue</b> <b>Street2:</b> _____			
<b>* City:</b> <b>Lorain</b> <b>County/Parish:</b> _____			
<b>* State:</b> <b>Ohio</b> <b>Province:</b> _____			
<b>* Country:</b> <b>USA: UNITED STATES</b>			
<b>* Zip / Postal Code:</b> <b>44052</b>			
<b>e. Organizational Unit:</b>			
<b>Department Name:</b> <b>Building, Housing &amp; Planning</b>		<b>Division Name:</b> _____	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
<b>Prefix:</b> <b>Mr.</b> <b>Middle Name:</b> _____	<b>* First Name:</b> <b>Matthew</b> <b>Last Name:</b> <b>Kuszni</b> <b>Suffix:</b> _____	<b>Title:</b> <b>Director</b> <b>Organizational Affiliation:</b> _____	
<b>* Telephone Number:</b> <b>440-204-2083</b>		<b>Fax Number:</b> <b>440-204-2083</b>	
<b>* Email:</b> <b>Matt_Kuszni@cityoflorain.org</b>			

Application for Federal Assistance SF-424	
*9. Type of Applicant 1: Select Applicant Type:	
<input checked="" type="checkbox"/> City Government	
Type of Applicant 2: Select Applicant Type:	
<input type="checkbox"/>	
Type of Applicant 3: Select Applicant Type:	
<input type="checkbox"/>	
* Other (specify):	
<input type="checkbox"/>	
*10. Name of Federal Agency:	
<input checked="" type="checkbox"/> US Department of Housing & Urban Development	
11. Catalog of Federal Domestic Assistance Number:	
<input type="checkbox"/> 14.23B	
CFDA Title:	
<input type="checkbox"/> HOME Investment Partnership (HOME)	
*12. Funding Opportunity Number:	
<input type="checkbox"/>	
*Title:	
<input type="checkbox"/>	
13. Competition Identification Number:	
<input type="checkbox"/>	
Title:	
<input type="checkbox"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.):	
<input type="checkbox"/>	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
*15. Descriptive Title of Applicant's Project:	
<input type="checkbox"/> HOME Program - Continuation of the City of Lorain's programs, including administration, housing rehab, neighborhood revitalization, and Community Housing Development Organization (CHDO).	
Attach supporting documents as specified in agency instructions.	
<input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424			
16. Congressional Districts Of:			
* a. Applicant	<input type="text" value="9"/>		
* b. Program/Project			
<input type="text" value="9"/>			
Attach an additional list of Program/Project Congressional Districts if needed.			
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>			
17. Proposed Project:			
* a. Start Date:	<input type="text" value="01/01/2023"/>		
* b. End Date: <input type="text" value="12/31/2023"/>			
18. Estimated Funding (\$):			
* a. Federal	<input type="text" value="828,402.00"/>		
* 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" value="60,000.00"/>		
* g. Total	<input type="text" value="888,402.00"/>		
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?			
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>			
<input type="checkbox"/> b. Program is subject in E.O. 12372 but has not been selected by the State for review.			
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.			
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", provide explanation and attach			
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 remaining 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. (44 U.S. Code, Title 21, Section 1004)			
<input checked="" type="checkbox"/> * 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:	<input type="text" value="Mr."/>	* First Name:	<input type="text" value="Jack"/>
Middle Name:	<input type="text" value="W"/>	<input type="text"/>	
* Last Name:	<input type="text" value="Bradley"/>	<input type="text"/>	
Suffix:	<input type="text"/>	<input type="text"/>	
* Title:	<input type="text" value="Mayor"/>		
* Telephone Number:	<input type="text" value="440-204-2002"/>	Fax Number:	<input type="text" value="440-204-2542"/>
* Email:	<input type="text" value="Jack_Bradley@cityofbrain.org"/>		
* Signature of Authorized Representative:			* Date Signed: <input type="text" value="4/23/2023"/>

<b>Application for Federal Assistance SF-424</b>			
<b>* 1. Type of Submission:</b>		<b>* 2. Type of Application:</b>	
<input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
<b>* 3. Date Received:</b>		<b>4. Applicant Identifier:</b> <input type="text" value="City of Lorain, Ohio"/>	
<b>5a. Federal Entity Identifier:</b>		<b>5b. Federal Award Identifier:</b> <input type="text" value="B-23-MC-39-0016"/>	
State Use Only:			
<b>6. Date Received by State:</b>		<b>7. State Application Identifier:</b>	
<b>8. APPLICANT INFORMATION:</b>			
<b>* a. Legal Name:</b> <input type="text" value="City of Lorain, Ohio"/>			
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b>		<b>* c. UEI:</b>	
<input type="text" value="34-8001700"/>		<input type="text" value="JKSXKMDBYLL7"/>	
<b>9. Address:</b>			
<b>* Street1:</b>	<input type="text" value="200 West Erie Avenue"/>		
<b>Street2:</b>	<input type="text"/>		
<b>* City:</b>	<input type="text" value="Lorain"/>		
<b>County/Parish:</b>	<input type="text"/>		
<b>* State:</b>	<input type="text" value="Ohio"/>		
<b>Province:</b>	<input type="text"/>		
<b>* Country:</b>	<input type="text" value="USA - UNITED STATES"/>		
<b>* Zip / Postal Code:</b>	<input type="text" value="44052"/>		
<b>9. Organizational Unit:</b>			
<b>Department Name:</b>	<b>Division Name:</b>		
<input type="text" value="Building, Housing &amp; Planning"/>		<input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
<b>Prefix:</b>	<input type="text" value="Mr."/>	<b>* First Name:</b>	<input type="text" value="Matthew"/>
<b>Middle Name:</b>	<input type="text"/>		
<b>* Last Name:</b>	<input type="text" value="Kusznir"/>		
<b>Buffix:</b>	<input type="text"/>		
<b>Title:</b>	<input type="text" value="Director"/>		
<b>Organizational Affiliation:</b>			
<input type="text"/>			
<b>* Telephone Number:</b>	<input type="text" value="440-204-2083"/>	<b>Fax Number:</b>	<input type="text" value="440-204-2083"/>
<b>* Email:</b>	<input type="text" value="Matt.Kusznir@cityoflorain.org"/>		

**Application for Federal Assistance SF-424**

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

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

\* 10. Name of Federal Agency:  
**US Department of Housing & Urban Development**

\* 11. Catalog of Federal Domestic Assistance Number:  
**14.Z18**

CFDA Title  
**Community Development Block Grant (CDBG)**

\* 12. Funding Opportunity Number:

\* Title:

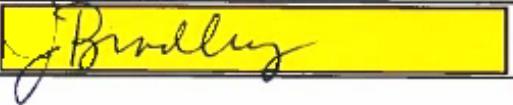
\* 13. Competition Identification Number:

Title:

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

\* 15. Descriptive Title of Applicant's Project:  
**CDBG Program - Continuation of the City of Lorain's programs, including housing rehabilitation, public improvements, public service, and neighborhood revitalization.**

Attach supporting documents as specified in agency instructions.

Application for Federal Assistance SF-424			
16. Congressional Districts Of:			
* a. Applicant	8		
* b. Program/Project			
Attach an additional list of Program/Project Congressional Districts if needed.			
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>			
17. Proposed Project:			
* a. Start Date:	01/01/2023		
* b. End Date: 12/31/2023			
18. Estimated Funding (\$):			
* a. Federal	1,344,334.00		
* b. Applicant			
* c. State			
* d. Local			
* e. Other			
* f. Program Income	184,400.00		
* g. TOTAL	1,508,734.00		
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?			
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>			
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.			
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.			
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes," provide explanation and attach <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 21, Section 1001)			
<input checked="" type="checkbox"/> ** I AGREE			
<small>* 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.</small>			
Authorized Representative:			
Prefix:	Mr.	* First Name:	Jack
Middle Name:	W		
* Last Name:	Bradley		
Suffix:			
* Title:	Mayor		
* Telephone Number:	440-204-2002	Fax Number:	440-204-2642
* Email:	Jack.Bradley@cityofflorain.org		
* Signature of Authorized Representative:			* Date Signed: 4/28/2023

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0019  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1685-1688), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§5523 and 527 of the Public Health Services Act of 1942 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 16 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190); and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11988; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 178(c) of the Clean Air Act of 1966, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11693 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1990 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		Mayor	
APPLICANT ORGANIZATION		DATE SUBMITTED	
City of Lorain, Ohio		4/28/2023	

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## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (41 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 18 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1685-1688), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 627 of the Public Health Service Act of 1912 (42 U.S.C. §§280 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1601-1606 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 16 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.

14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11990; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 178(c) of the Clean Air Act of 1966, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

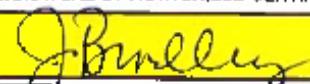
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historical Preservation Act of 1974 (16 U.S.C. §§468a-1 et seq.).

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		Mayor	
APPLICANT ORGANIZATION		DATE SUBMITTED	
City of Lorain, Ohio		4/28/2023	

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## 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.

**Uniform Relocation Act and 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, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It is in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant 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 law, 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 Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

  
Signature of Authorized Official

4/26/2023  
Date

Mayor \_\_\_\_\_  
Title \_\_\_\_\_

### Specific Community Development Block Grant 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 plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan 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 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 CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having 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 (see Optional CDBG Certification).

**2. Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2023, 2024 & 2025 [a period specified by the grantee 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.

In addition, 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 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 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.

  
Signature of Authorized Official

4/28/2023  
Date

Mayor  
Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(e):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having 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 to meet such needs.

  
Signature of Authorized Official

4/28/2023  
Date

Mayor \_\_\_\_\_  
Title \_\_\_\_\_

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invert any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

  
Signature of Authorized Official

4/28/2023  
Date

Mayor  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### **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.