Executive Summary

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

1. Introduction

The City of Sheboygan's 2015-2019 Consolidated Plan is a comprehensive document promoting a coordinated approach to housing and community needs, and fostering the coordination of all programs funded by the U.S. Department of Housing and Urban Development (HUD). It provides guidance for investment of HUD dollars, as well as other federal, state, and local funding dollars. This Plan outlines the priorities by which the City's Community Development block Grant (CDBG) Program will be invested over the next five years. Every year the City will produce an Annual Action Plan to detail specific activities to carry out the Plan's priorities and goals.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

5-YEAR GOALS	5-YEAR OUTCOMES
Affordable Housing	
1. Make repairs or rehab existing income-eligible owner occupied housing to address building code issues	60 homes of income-eligible homeowners are made safer
2. Assist income-eligible households into homeownership.	15 income-eligible helped to become homeowners
3. Assist owners of rental properties to develop or improve rental housing for lower income households	25 rental properties rehabbed to be code compliant and made more affordable
Neighborhood Revitalization	
1. Increase safety, provide crime protection and foster building code compliance in locally selected areas.	10 police district neighborhoods completed
2. Foster and create new neighborhood associations in partnership with Sheboygan Neighborhood Pride and Sheboygan Police Department.	10 new neighborhood associations developed and recognized by Common Council
3. Initiate improvement efforts in locally-selected geographical areas.	5 neighborhoods improved through a variety of initiatives including park, street improvements and/or street lighting
Anti-Poverty Strategy	
1. Reduce incidents of homelessness	1000 persons helped to avoid or mitigate homelessness.

Consolidated Plan SHEBOYGAN 1

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Economic Development	
Provide assistance for central commercial zone businesses to complete Historic Preservation projects.	10 businesses assisted through the City's Historic Preservation programs
2. Create full-time permanent jobs at living wages.	50 jobs of which 51% are LMI jobs.
3. Foster commercial redevelopment projects in locally selected areas.	2 targeted areas assisted.

3. Evaluation of past performance

Every year, the City of Sheboygan reports its progress in meeting the five-year and annual goals in the Consolidated Annual Performance Evaluation Report (CAPER). The CAPER is submitted to HUD within 90 days after the start of new program year. Copies of the CAPER are available for review at the City of Sheboygan, Department of City Development.

4. Summary of citizen participation process and consultation process

The City conducted an on-line survey to gain public comments from residents of Sheboygan to determine the goals and objectives for the investment of the funds. 286 people took the survey which ran for a month and a half from October 1 to November 15. The Consolidated Planning process was publicized at Common Council meetings, on the city's website, social media outlets, and an article appeared in the Sheboygan Press on _______, 2014. On October 23, 2014, focus groups were held with past and current public service entities and community development representatives. Participants in the focus groups were invited to provide anonymous comments in an online survey format after the focus groups, in order to allow all comments to be made and heard. The Department and Common Council also held various meetings to review the draft plan and prior to the final plan adoption.

5. Summary of public comments

Comments received during the public meetings prior and during the preparation of the Plan as well as the Plan priorities are summarized within the Citizen Participation Section of this Plan.

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

All comments are taken into consideration in preparing the Consolidated Plan. The City has reviewed all comments for common and recurring themes to help establish priorities and goals.

7. Summary

This five-year plan identifies the community's affordable housing, community development and economic development needs as well as outlines a comprehensive and coordinated strategy for implementation of programs. The City will utilize CDBG funds to leverage other public and private investment to address the City's priority goals.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The City of Sheboygan, Department of City Development is the lead agency for the development, administration and review of the Consolidated Plan.

Agency Role	Name	Department/Agency
Lead Agency SHEBOYGAN		Department of City Development

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information:

City of Sheboygan Department of City Development 828 Center Avenue, Suite 104 Sheboygan, WI 53081

Telephone: (920) 459-3377

Fax: (920) 459-7302

Email: development@sheboyganwi.gov

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

1. Introduction

The City of Sheboygan conducted significant consultation with citizens, municipal officials, non-profit agencies, public housing agencies, private developers, governmental agencies in preparing this plan. The City started the process with preparing and advertising an on-line survey to start the development of the plan. These meetings are summarized in the Citizen Participation Section of this plan.

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

The city of Sheboygan is committed to addressing the needs of homeless citizens, and those in threat of homelessness, in relation to both physical and mental/behavioral health needs. The City of Sheboygan and the Sheboygan Housing Authority have a working relationship. The two entities work hand in hand on issues of homelessness and public housing, along with the Sheboygan County CoC. The City also works closely with nonprofit groups in Sheboygan, focused on health services, including mental health services. The City has regular communication with these entities, and has made an effort to connect these entities with multiple City Departments to further enhance communication and coordination. Development staff has participated in Point in Time (PIT) homeless counts, and further communication regarding the needs of the homeless population, and plans to continue to participate in the future. The City will continue a working relationship with each of these agencies, keeping each other informed of the services, needs, and changing circumstances in Sheboygan. The City will increase communication with and between these groups as the need arises.

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

City Staff participate with the Point in Time survey to be exposed to the homeless needs of the community to provide some background data as to where funds should be allocated to assist with homeless population. Under Public Services funds, the City funds Lakeshore CAP which is the County's provider for the Continuum of Care, Rapid Re-housing, Emergency Housing Assistance. County mental health agencies organized a meeting of all involved in the spring of 2014 to develop a strategy to dealing with mental health concerns in the County. City staff participated in this strategy session.

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

The City of Sheboygan does not apply for ESG funds. As part of the 2015-2019 consolidated planning cycle, the City of Sheboygan will utilize the Analysis of Impediments to Fair Housing to identify where underserved populations are located and concentrated. In an effort to reduce barriers to reaching the underserved, Sheboygan's Housing Coalition continues to assist the facilitation of city-wide collaborations focused on coordinating the work of housing social service agencies. City staff participated in the July 2014 "Point in Time" count. The survey provided insight into the demographics of subpopulations within the overall homeless populations including homeless veterans, the chronically homeless, victims of domestic violence. This data will allow the City to more effectively determine the types and quantities of needed services based on the actual population county.

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

Agency/Group/Organization Name	Agency/Group/Organization Type	Con. Plan Section Consulted	How Consulted?
City Administration & Finance	Local Government	Community Development	Focus Group & Survey
Police Department	Local Government	Community Development	Focus Group & Survey
Dept. of Public Works	Local Government	Community Development	Focus Group & Survey
Transit Dept.	Local Government	Community Development	Focus Group & Survey
Mayor	Local Government	Community Development	Focus Group & Survey
HOME Inc.	Housing Services	All	Focus Group & Survey
Sheboygan Neighborhood Pride	Neighborhood Services	All	Focus Group & Survey

Hmong Association	Services	All	Focus Group & Survey
City Aldermen	Local Government	All	Focus Group & Survey
Safe Harbor	Housing Services	All	Focus Group & Survey
Library	Services	All	Focus Group & Survey
Senior Center	Services	All	Focus Group & Survey
Partners for Community Development	Housing Services	All	Focus Group & Survey
Family Service Association	Services	All	Focus Group & Survey
Sheboygan County Interfaith Organization	Services	All	Focus Group & Survey
City Building Inspection	Local Government	All	Focus Group & Survey
Sheboygan County Health and Human Services	Local Government	All	Focus Group & Survey
Housing Authority	Housing Services	All	Focus Group & Survey
Habitat for Humanity	Housing Services	All	Focus Group & Survey
Lakeshore Community Health Center	Health Services	All	Focus Group & Survey

Table 2 – Agencies, groups, organizations who participated

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

Efforts were made to consult as broadly as possible with community stakeholders. No particular agency types were excluded from participation.

Other local/regional/state/federal planning efforts.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2014 Community Health	United Way of Sheboygan	Lack of insurance for health care
Assessment	County	cost of LMI person in the City

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City of Sheboygan will continue its collaborative efforts and partnerships as detailed throughout this report including the State agencies that administer CDBG funds to ensure the complete implementation of this Consolidated Plan.

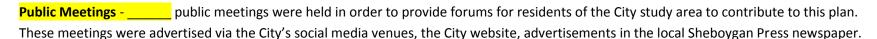
PR-15 Citizen Participation

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

The City employed a strategic approach to citizen participation for the development of this plan. Stakeholders with unique points of view were identified up front and sought for participation. Methods of engaging with the public were varied and included a survey, interviews, public meetings, focus groups, and survey directed to one-on-one discussions.

Needs Assessment and Fair Housing Survey — This survey was designed to collect input from a broad spectrum of the community and received responses from residents across the City limits. The survey consisted of eight questions, allowing a mixture of both multiple choice and open ended responses. In all there were 286 responses to the survey over a 45-day period, from October 1, 2014 to November 14, 2014. To prevent "ballot stuffing", SurveyMonkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was displayed on the City's website and was distributed via the City's social media platform including, Nextdoor, Twitter and Facebook. The survey was also distributed through various email distribution lists. The City utilized city staff members to assist if needed in translating the survey in Spanish and Hmong.

Focus Groups – Key community stakeholders and public service agencies were identified, contacted and invited to participate in focus groups. Two focus groups were administered. One included all past and current public service agencies and was attended by 17 members of the non-profit community. The second focus group was a community development session, which included City leaders, business related groups and was attended by 5 members of the community.



Citizen Participation Outreach:

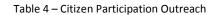
Sort	Mode of Outreach	Target of	Summary of	Summary of	Summary of comments	URL
Orde	•	Outreach	Response\	comments received	not accepted and	(if applicable)
			Attendance		reasons	

	6 (6)	Cl. I	206	T =1		1 //
1	City of Sheboygan	Sheboygan	286 survey	There is a need for public	There were comments made	https://www
	Community Needs	Residents	respondents	infrastructure and capital	about reducing wasteful	surveymonkey.com
	Survey			improvements, especially:	government spending, which	/s/MS9R6K7
				Street repairs, street	will not be accepted as that	
				lighting, and the	is out of the scope of this	
				repair/replacing aging	plan.	
				infrastructure such as		
				sewer pipes.	There was also a comment	
					regarding the need for	
				There is a need for a focus	requiring SSI recipients to	
				on housing for victims of	pass a drug screening in	
				domestic violence, and	order to receive funds. That	
				temporary	too is out of the scope of	
				housing/transitional	this plan.	
				housing in the community.		
				There is a need for the		
				reduction of poverty, of		
				support for those with		
				substance abuse issues,		
				and options for those in		
				need of job training and		
				employment assistance.		
				There is a need for		
				economic improvement		
				efforts to reduce		
				commercial vacancies, and		
				increase retail and		
				restaurant options for		
				residents.		
				There is a need for		
				housing rehabilitation,		
				both for owner occupied		
				and rental units. The		
				aging housing stock in the City needs attention.		
				City needs attention.		
				There is a need for family		
				support services, to help		
				families and single		
				parents, specifically with		
	Consolidate	ed Plan	•	SHEBOYIC AME to ensure		11
			•	parents can hold a job.		
OMB Control	No: 2506-0117 (exp. 07/31/2	015)				

2	Community	City of	5 participants	There is an understanding	All comments were	N/A
	Development Focus	Sheboygan		that street	considered.	
	Group	Officials, staff,		improvements/repair is		ļ ,
	'	and civic		important to the		
		leaders		community, but an		
				emphasis was placed on		
				how other funds can and		
				should be used.		
				There is a need to		
				continue with		
				neighborhood focused		
				programs such as housing		
				rehabilitation and the		
				support of neighborhood		
				associations.		
				A		
				A more focused approach to the use of CDBG funds		
				should be devised, rather than piecing out funds.		
				This focus could concern		
				both Community		
				Development and Public		
				Service funds. The		
				benefits of this would be		
				recognition and visibility		
				in the community, and the		
				ability to make a real		
				difference in the areas of		
				focus.		
				Funding is down and need		
				is up, the City needs to		
				decide the best way to use		
				the funds to make the		
				biggest impact.		

3	Public Service Focus	Public service	17 participants	Strengths of the current	All comments were	
	Group	agency		CDBG program are the	considered.	
		representatives		rehabilitation of rental		
				and blighted properties,		
				the increase in the		
				Shoreline Metro ridership		
				and the quality of the		
				service, and the existing		
				focus on neighborhoods.		
				The biggest weaknesses of		
				the current CDBG plan are		
				the limited mass transit		
				connectivity with outlying		
				areas, communication		
				between agencies and		
				outreach, the fact that the		
				funding is spread too thin,		
				and lack of		
				control/regulation/educati		
				on of landlords in		
				Sheboygan.		
				The main priorities of the		
				next 5-year plan should		
				be: Address (safe & stable)		
				housing needs and access,		
				transportation to quality		
				jobs/outlying areas that is		
				safe and affordable, and		
				to create a vision and		
				focus for funding		
				programs with CDBG		
1				dollars.		

4	Focus Group Follow-Up	Participants in	8 respondents	The need for a cohesive	All comments were	https://www.
	Survey	both the focus groups		community approach, rather than piecing out	considered.	Surveymonkey. Com/s/
		groups		small amounts of funds to		followupsheboygan
				so many agencies with no		, , , , ,
				focused purpose/goal.		
				A method should be in		
				place to increase		
				communication and collaboration between		
				agencies, and to reduce		
				service duplication or		
				waste.		
				The need to act to reduce		
				the root causes of		
				homelessness and poverty, rather than only		
				being reactive.		
				There needs to be a focus		
				on family services,		
				providing daycare and		
				transportation to allow parents to hold jobs.		
				A focus on housing issues is needed. This includes		
				addressing homelessness,		
				transitional homes, and		
				the upkeep of rental and		
				owner occupied housing.		
				There is a need for a		
				communal effort focusing		
				on the development and support of the children of		
				the community.		
				There is a need to involve		
				some of Sheboygan's		
	Consolidate	nd Dlan	ر	local HE ϸ ጩ፞፞፞፞፞፞፞፞፞፞፞፞ቒፙጜቚ/commercial		14
			3	sector in the discussions		14
OMB Cor	trol No: 2506-0117 (exp. 07/31/2	015)		on how to improve the		
				City, and the support they		
				can offer.		



OMB Control No: 2506-0117 (exp. 07/31/2015)

Needs Assessment

NA-05 Overview

Needs Assessment Overview exercise

Based on HUD provided figures, the following data indicates the number and percentage of renters and homeowners who may be subject to housing problems, based on income level. The recent economic recession has substantially increased the number of households experiencing housing problems and cost burdens.

HUD receives a "special tabulation" of data from the U.S. Census Bureau's American Community Survey (ACS) that is largely not available through standard Census products. This special tabulation data provides counts of the number of households that fit certain combinations of HUD-specific criteria such as housing needs, HUD-defined income limits, and household types of particular interest to planners and policy-makers. This data, known as the Comprehensive Housing Affordability Strategy (CHAS) data, is used by local governments for housing planning and as part of the Consolidated Planning process.

Assessing the specific housing needs of the City of Sheboygan is critical to creating a realistic and responsive affordable housing strategy. The assessment utilized HUD's new eCon Planning Suite within the Integrated Disbursement and Information System (IDIS). The eCon Planning Suite pre-populates the most up-to-date housing and economic data available to assist jurisdiction's in identifying funding priorities in the Consolidated Plan and Annual Action Plan. Highlights of this assessment are provided in this section.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The housing needs of the City of Sheboygan were identified with information from the 2010 Census, American Community Survey estimates from 2009-2012, public input from residents and stakeholders, and reports from the CoC.

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	50,792	49,544	-2%
Households	20,799	20,301	-2%
Median Income	\$40,066.00	\$43,203.00	8%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	2,195	2,955	4,410	2,665	8,075
Small Family Households *	655	870	1,240	960	4,220
Large Family Households *	115	155	445	275	770
Household contains at least one					
person 62-74 years of age	190	445	875	435	1,105
Household contains at least one					
person age 75 or older	480	730	725	315	625
Households with one or more					
children 6 years old or younger *	380	565	755	395	750
* the highest income					/30

the highest income category for these family types is >80% HAMFI

Table 6 - Total Households Table

Data Source: 2007-2011 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

			Renter			Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOL	JSEHOLDS									
Substandard										
Housing -										
Lacking										
complete										
plumbing or										
kitchen facilities	80	20	80	0	180	15	10	20	0	45
Severely										
Overcrowded -										
With >1.51										
people per										
room (and										
complete										
kitchen and										
plumbing)	4	0	15	0	19	0	0	25	25	50
Overcrowded -										
With 1.01-1.5										
people per										
room (and none										
of the above										
problems)	0	25	85	45	155	35	20	0	20	75
Housing cost										
burden greater										
than 50% of										
income (and										
none of the										
above										
problems)	1,145	245	0	0	1,390	285	250	150	20	705
Housing cost										
burden greater										
than 30% of										
income (and										
none of the										
above										
problems)	190	875	340	10	1,415	95	490	910	335	1,830

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Zero/negative										
Income (and										
none of the										
above										
problems)	65	0	0	0	65	45	0	0	0	45

Table 7 – Housing Problems Table

Data 2007-2011 CHAS

Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter							Owner		
	0-30%	>30-	>50-	>80-	Total	0-	>30-	>50-	>80-	Total
	AMI	50%	80%	100%		30%	50%	80%	100%	
		AMI	AMI	AMI		AMI	AMI	AMI	AMI	
NUMBER OF HOUSEH	OLDS									
Having 1 or more of										
four housing										
problems	1,230	295	175	45	1,745	330	275	190	60	855
Having none of four										
housing problems	410	1,365	1,745	645	4,165	110	1,020	2,300	1,915	5,345
Household has										
negative income,										
but none of the										
other housing										
problems	65	0	0	0	65	45	0	0	0	45

Table 8 – Housing Problems 2

Data 2007-2011 CHAS

Source:

3. Cost Burden > 30%

		Rei	nter		Owner			
	0-30% AMI	>30-50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50-80% AMI	Total
NUMBER OF HOL	JSEHOLDS							
Small Related	555	495	115	1,165	65	215	385	665
Large Related	55	50	20	125	60	50	99	209
Elderly	275	250	130	655	265	320	350	935

			Owner					
	0-30% AMI	>30-50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50-80% AMI	Total
Other	525	340	120	985	25	155	210	390
Total need by income	1,410	1,135	385	2,930	415	740	1,044	2,199

Table 9 - Cost Burden > 30%

Source:

Data 2007-2011 CHAS

4. Cost Burden > 50%

			Owner					
	0-30% AMI	>30- 50%	>50- 80%	Total	0-30% AMI	>30- 50%	>50- 80%	Total
		AMI	AMI			AMI	AMI	
NUMBER OF HOL	SEHOLDS							
Small Related	505	135	0	640	55	95	30	180
Large Related	45	0	0	45	60	0	4	64
Elderly	265	80	0	345	180	65	80	325
Other	390	45	0	435	25	85	30	140
Total need by	1,205	260	0	1,465	320	245	144	709
income								

Table 10 – Cost Burden > 50%

Data Source: 2007-2011 CHAS

5. Crowding (More than one person per room)

		Renter						Owner		
	0-30%	>30-	>50-	>80- 1000/	Total	0-30%	>30-	>50-	>80- 100%	Total
	AMI	50% AMI	80% AMI	100% AMI		AMI	50% AMI	80% AMI	100% AMI	
NUMBER OF HOUSEH	IOLDS									
Single family										
households	4	45	85	15	149	35	20	0	45	100
Multiple, unrelated										
family households	0	0	15	30	45	0	0	25	0	25
Other, non-family										
households	0	0	0	0	0	0	0	0	0	0
Total need by	4	45	100	45	194	35	20	25	45	125
income										

Table 11 – Crowding Information – 1/2

Data

2007-2011 CHAS

Source:

		Renter				Owner			
	0-30%	>30-	>50-	Total	0-30%	>30-	>50-	Total	
	AMI	50%	80%		AMI	50%	80%		
		AMI	AMI			AMI	AMI		
Households with									
Children Present									

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

A source of data for estimating the need for assistance among single-family households was not available for the City.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to the 2011-2013 American Community Survey Estimates, 5,823 Sheboygan residents (or 12.1% of the population) were of a disabled status. The data also reflected that nearly one third (32.7%) of the Sheboygan population 65 years or older is living with a disability. Based on data provided from the domestic violence shelter, service was provided to 1,215 individuals with a yearly goal of supporting 465 individuals.

What are the most common housing problems?

The most common housing problem in the City is cost burden, where residents paid more than 30% of their gross income on housing costs. This problem is most acute for renters and households with incomes under 30 percent of the AMI. Households paying more than 50 percent of their income for housing is also an issue, again particularly for those with incomes under 30 percent of AMI.

According to 2007-2011 CHAS data, 1,525 households under 30 percent of AMI were paying at least 50 percent of their gross income on housing costs. A total of 1,465 renters with 50 percent or less of AMI paid over 50 percent of their monthly income on housing costs; no renters in any higher income category paid this high a percentage for housing.

Far fewer owner-occupied households were paying over 50 percent of their monthly income on housing costs. The data shows that while 1,465 renters under 80 percent of AMI paid over 50 of their monthly income on housing costs; Fewer than half that amount of homeowners, only 709, at this income level did so.

Are any populations/household types more affected than others by these problems?

The housing trend is that renters and extremely low-income households are much more likely to have housing problems than homeowners and higher income groups. CHAS data on severe housing problems indicated that 1,745 renter households and 855 owner households had one or more housing problems; and of the households with one or more housing problems, 96 percent (2,495 rental and owner households) were at or under 80% of AMI. Renter households were much more likely to suffer from substandard housing – lacking complete plumbing or kitchen facilities; 180 renter households reported this problem while 45 owner households suffered from substandard housing. Low to moderate- income single family renter households were more likely to be overcrowded households as 54 percent of overcrowded households were single family households that were at or below 80 percent AMI.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Individuals with an imminent risk of residing in shelters or becoming unsheltered typically have a combination of financial factors present in their lives; lack of living wage job, rent consuming more than 30 percent of their income, and high child care, medical, or transportation costs. The City will continue to provide funding to the Housing Assistance Center administered by Lakeshore CAP to address the need of residents who are currently housed but are at imminent risk of becoming unsheltered. The City will also continue to collaborate with the Continuum of Care to address the needs of formerly homeless families receiving rapid re-housing assistance.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The City itself does not have methodology to create estimates of at-risk populations.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

Based on information provided by the Homeless Management Information System, issues that are linked with housing instability and an increased risk of homelessness include poverty and fixed incomes, high housing costs (including utilities), domestic violence, and unstable employment/unemployment.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines disproportionately greater number of housing problems by a racial or ethnic group as when a group experiences housing problems at a rate more than 10% greater than the income group as a whole.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,420	330	100
White	1,825	315	85
Black / African American	135	0	0
Asian	79	10	0
American Indian, Alaska Native	35	0	0
Pacific Islander	0	0	0
Hispanic	290	0	15

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2007-2011 CHAS

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,705	980	0
White	1,430	920	0
Black / African American	35	15	0
Asian	80	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0

^{*}The four housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Hispanic	145	20	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2007-2011 CHAS

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,595	3,085	0
White	1,290	2,825	0
Black / African American	10	35	0
Asian	175	85	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	95	120	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2007-2011 CHAS

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	
Jurisdiction as a whole	475	2,545	0	
White	375	2,310	0	
Black / African American	0	0	0	
Asian	15	100	0	

^{*}The four housing problems are:

^{*}The four housing problems are:

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	55	0	0
Pacific Islander	0	0	0
Hispanic	25	140	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2007-2011 CHAS

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Extremely low-income (0-30% AMI): With regard to housing problems, African American or Black (135), American Indian (35), and Hispanic households (290) had a disproportionately greater need.

Low income (30-50% AMI): With regard to housing problems, Asian (80) and Hispanic households (145) had a disproportionately greater need.

Moderate Income: With regard to housing problems, Asian (175) and Hispanic households (95) had a disproportionately greater need.

The disparate impact analysis for housing problems determined that White and Hispanic populations in Sheboygan had percentages higher that the jurisdiction as a whole. Extremely low-income households had the highest frequency of housing problems across all racial and ethnic groups. Low-income Hispanics and Whites in two of the three categories experienced disproportionately greater need in terms of housing problems.

^{*}The four housing problems are:

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,765	980	100
White	1,335	800	85
Black / African American	125	10	0
Asian	39	55	0
American Indian, Alaska Native	35	0	0
Pacific Islander	0	0	0
Hispanic	224	65	15

Table 17 - Severe Housing Problems 0 - 30% AMI

Data Source: 2007-2011 CHAS

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	455	2,230	0
White	325	2,025	0
Black / African American	0	50	0
Asian	60	40	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	55	115	0

Table 18 – Severe Housing Problems 30 - 50% AMI

^{*}The four severe housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Data Source: 2007-2011 CHAS

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	375	4,305	0
White	235	3,885	0
Black / African American	0	50	0
Asian	135	130	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	4	210	0

Table 19 - Severe Housing Problems 50 - 80% AMI

Data Source: 2007-2011 CHAS

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	120	2,905	0
White	55	2,640	0
Black / African American	0	0	0
Asian	15	100	0
American Indian, Alaska Native	40	15	0
Pacific Islander	0	0	0
Hispanic	10	155	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2007-2011 CHAS

^{*}The four severe housing problems are:

^{*}The four severe housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Discussion

Extremely low-income (0-30% AMI): With regard to severe housing problems, African American or Black (125), American Indian (35), and Hispanic households (224) had a disproportionately greater need.

Low income (30-50% AMI): With regard to severe housing problems, Asian (60) and Hispanic households (55) had a disproportionately greater need.

Moderate Income: With regard to severe housing problems, only Asian households (135) had a disproportionately greater need.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	14,080	3,770	2,410	100
White	12,835	3,205	1,935	85
Black / African American	65	55	125	0
Asian	545	155	49	0
American Indian, Alaska				
Native	40	15	35	0
Pacific Islander	0	0	0	0
Hispanic	545	265	250	15

Table 21 - Greater Need: Housing Cost Burdens AMI

Data Source: 2007-2011 CHAS

Discussion:

No racial or ethnic group has a disproportionately greater need in cost burdens of households reporting spending 30-50% of income on costs. African American or Black (125), American Indian (35), and Hispanic (250) households have a disproportionately greater need in terms of severe cost burdens.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

In the extremely low-income category (0-30% AMI), most racial and ethnic minorities have a disproportionately greater need in terms of having one or more housing problems, although Asian minorities have tend to have a disproportionately greater need in the low-income (30-50% AMI) and moderate-income (50-80% AMI) categories. Hispanic minorities are showing a disproportionately greater need in most income categories. The needs of African American or Black households, along with American Indian households are only disproportionately higher in the extremely low-income (0-30% AMI) category in terms of housing problems. Housing cost burden is shared equally between racial groups in the extremely low and low-income categories (0-30% & 30-5-% AMI), but in the moderate income category (>50% AMI) the need is disproportionately greater for African American or Black, American Indian, and Hispanic Households.

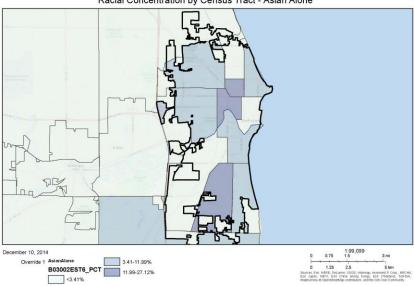
If they have needs not identified above, what are those needs?

Households that experience a disproportionately greater need may be faced with other needs such as affordable rentals that are safe and in areas of opportunity, additional supportive services, and housing for the mentally ill.

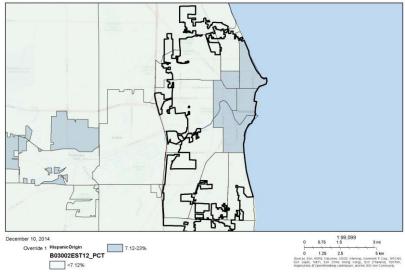
Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Racial and ethnic minorities are located throughout Sheboygan, but a greater concentration can be found in the center of the city, specifically in census tracts 2.01, 5, 8, 114, 10, and 1. The minority groups located here are mainly Asian and people of Hispanic origin. The maps below illustrate the concentrations of each of these groups in the City. The highest concentration of these minority groups is located in the very center of Sheboygan, specifically in census tracts 2.01 and 5. In census tract 2.01 the Asian population makes up 15.07% of the total, and people of Hispanic origin comprise 20.42% of the total population for that tract. In census tract 5 the Asian population makes up 15.73% of the total, and people of Hispanic origin comprise 17.04% of the population for that tract. Although these two census tracts hold the highest concentration when considering both Asian people and people of Hispanic origin, it is census tract 10 that has the highest population of Asian people (but low populations of other minority groups) with 16.6% of the total population.





Racial Concentration by Census Tract - Persons of Hispanic Origin



NA-35 Public Housing – 91.205(b)

Introduction

Low-income residents largely depend on local housing authorities for access to affordable housing and related services. The purpose of public housing (PHA) is to ensure safe, decent, affordable housing and to create opportunities for residents self-sufficiency and economic independence.

The

Totals in Use

Program Type										
	Certificate	Mod-	Public	Vouchers						
		Rehab	Housing	Total	Project -	Tenant -	Speci	Special Purpose Voi		
					based	based	Veterans	Family	Disabled	
							Affairs	Unification	*	
							Supportive	Program		
							Housing			
# of units vouchers in use	0	0	231	167	0	163	1	0	0	

Table 22 - Public Housing by Program Type

Data Source: PIC (PIH Information Center)

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Characteristics of Residents

	Program Type												
	Certificate	Certificate Mod- Public Vouchers											
		Rehab	Housing	Total	Project -	Tenant -	Special Purp	ose Voucher					
					based	based	Veterans Affairs Supportive Housing	Family Unification Program					
Average Annual Income	0	0	10,656	12,230	0	12,121	8,076	0					
Average length of stay	0	0	5	4	0	4	0	0					
Average Household size	0	0	1	3	0	3	2	0					
# Homeless at admission	0	0	43	0	0	0	0	0					
# of Elderly Program Participants													
(>62)	0	0	61	23	0	23	0	0					
# of Disabled Families	0	0	113	44	0	44	0	0					
# of Families requesting accessibility													
features	0	0	231	167	0	163	1	0					
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0					
# of DV victims	0	0	0	0	0	0	0	0					

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type											
Race	Certificate	Mod-	Public	Vouchers							
		Rehab	Housing	Total	Project -	Tenant -	Speci	al Purpose Voi	al Purpose Voucher		
					based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *		
White	0	0	215	128	0	127	0	0	0		
Black/African American	0	0	9	16	0	16	0	0	0		
Asian	0	0	3	21	0	19	0	0	0		
American Indian/Alaska											
Native	0	0	1	1	0	0	1	0	0		
Pacific Islander	0	0	3	1	0	1	0	0	0		
Other	0	0	0	0	0	0	0	0	0		

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

				Program Type					
Ethnicity	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total	Project -	roject - Tenant - Special Purpose Voucher			ucher
					based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	17	26	0	25	0	0	0
Not Hispanic	0	0	214	141	0	138	1	0	0
*includes Non-Elderly Disa	bled, Mainstream	One-Year, M	ainstream Fi	ve-year, and Nu	rsing Home Tra	nsition	1	1	

Table 25 – Ethnicity of Public Housing Residents by Program Type

Section 504 Needs Assessment:

Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

We currently do not have a sufficient number of accessible units in public housing. As tenants age and disabilities become greater, the need for these units increases. The new 5 year plan for the housing authority will begin to address the issue with the proposed conversion of 20% of existing units into fully accessible units over a five year period. Unfortunately this will result in the net loss of some units, as we will need to take three units and make them into two to accommodate the space needed to accomplish this goal. We typically are able to accommodate requests for accessible units through a non-public housing site.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders:

The most immediate needs of our Public Housing tenants includes increased access to fully accessible units, increased space needs, increased parking needs. When our buildings were constructed, most tenants did not have personal vehicles. As we now accept tenants who have varied ages, many have vehicles. Most of our buildings are land locked and expanded parking is not possible at this time. We also have tenants with more personal belongings, and there is often not enough space in our apartments which contain roughly 450 square feet. We have no outside or basement storage available, so often times tenants choose to rent additional storage space, using precious dollars for this service. We often are asked to expand apartment space, however again we would decrease the number of available units by doing this and would create a greater need for public housing.

Housing Choice Voucher holders would greatly benefit from having a service coordinator position to assist them in accessing existing community resources for a variety of services including budgeting, job skills/employment opportunities, transportation and the like. There seems to be an adequate selection of housing within the city limits, as we have not had any voucher holders unable to find appropriate housing. Our lease-up time is normally less than 60 days.

How do these needs compare to the housing needs of the population at large

The challenges facing extreme low-income households and individuals, especially in relation to affordable housing are significant. However, the residents of public housing have the most acute needs in terms of income and often represent the highest need. More than half of all public housing residents and Section 8 voucher holders are disabled and likely receive a fixed income.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The Continuum of Care (CoC) in the City of Sheboygan is dedicated to the elimination of homelessness through emergency shelters and transitional housing for those most in need, subsidized housing for low-income individuals and those exiting homelessness, and preventative measures aimed at making housing affordable and keeping people in their homes.

Local factors contributing to homelessness include a lack of quality, affordable housing, extremely low household incomes, lack of living wage employment, declining amounts of housing subsidies, and strained support networks, especially the availability of medical and behavioral health services.

The greatest needs in the homeless population are families who are homeless and clients with mental or physical disabilities. Individuals and families in the jurisdiction face a myriad of other personal challenges that increase homelessness and exacerbate housing instabilities. These include mental illness, underemployment and unemployment, domestic violence, disabling health conditions, chemical dependencies, criminal justice system involvement, lack of adequate transportation, and credit/landlord histories.

The Lakeshore Housing Coalition served approximately 1879 Individuals in Sheboygan County in 2014 in 655 families. At the Point in Time Survey in July, there were 9 households in emergency shelter, 11 in transitional housing. These families represented 18 and 21 minors respectively. This included 46 families fleeing Domestic Violence and no Veterans.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
168 White		
20 Black		
8 Alaskan or American Indian		
11 Multiracial		
Ethnicity:	Sheltered:	Unsheltered (optional)
175 Not Hispanic		
16 Hispanic or Latino		

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Most families in need of housing assistance are single parent, female head of household who require some rental assistance to meet the expense of childcare. Most of these women are not receiving child support and are having to bear the burden of family care by themselves. They are unskilled, poorly educated and have had their work history or education interrupted by child bearing.

There are very few, if any homeless veterans. Veterans who enter the assistance network are quickly referred to the VA which has a number of programs for assistance.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Homelessness in our area is more likely to occur in minority groups. 81% of the families receiving aid are white while they make up 94% of the general population. Blacks and Hispanics are over represented in the population seeking shelter.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Homelessness in this generally rural area is almost always sheltered. Unsheltered homeless migrate to more urban areas where there are more services directed toward that population. Locally we see more rental assistance needed and homelessness prevention activity.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d) Introduction:

This section will discuss the characteristics and needs of persons in various subpopulations who are not homeless but who may require supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental,) persons with alcohol or drug addiction, victims of domestic violence, and persons with a criminal record and their families.

Describe the characteristics of special needs populations in your community:

The special needs population of Sheboygan consists of several groups: persons with disabilities, the elderly, and elderly with disabilities. Disabilities are physical or mental health issues that substantially limit one or more life activities such as walking, talking, learning, or caring for oneself (HUD Section 504). These physical or mental health issues include hearing or vision difficulties, physical difficulties, cognitive or development difficulties, and mental illness. Some of the special needs population could have more than one disability. Underemployment, unemployment, and often fixed incomes mean that the special needs population has a high proportion of poverty relative to the general population.

Sheboygan's elderly population, 65 years of age or more, is currently 13.7% (6,576 persons). According to the 2011-2013 American Community Survey (ACS) estimates 12.1% of Sheboygan's total population are individuals with an identified disability and 32.7% of all elderly residents have an identified disability. 7.2% of Sheboygan's elderly population has had an income in the past 12 months (at the time of the 2013 ACS estimation) that is below the poverty level. According to the ACS, 8.5% of the households containing at least one member over the age of 60 received food stamps in the past year.

According to the ACS 2011-2013 3-year estimates, individuals with earnings who also had a disability were earning only 63% (\$15,417.00 per year) of the median individual earnings (\$24,374.00 per year) in the City. Among households who received food stamps 34.8% of them contained 1 or more persons with a disability. 4.8% of those in the labor force have a disability, while 13.1% of those that are unemployed (not currently holding a job, but actively seeking employment) have a disability. Persons with a disability also make up 34.5% of those currently not in the labor force in the City of Sheboygan according to the ACS. These statistics illustrate the fact that people living with a disability in Sheboygan are more likely to live in poverty than those who are not disabled.

What are the housing and supportive service needs of these populations and how are these needs determined?

The greatest need for the special needs population is affordable, decent, and safe housing that provides supportive services and meets their accessibility requirements. For those living

independently, this kind of support can include accessibility modifications, assistive devices and assistance with home care and home maintenance.

There are a number of programs that are available in Sheboygan to assist the special needs population with their living and housing needs. The City of Sheboygan offers low and no-interest loans to qualified applicants to aid in housing rehabilitation needs including modifications for the accessibility of people with special needs. A Brush with Kindness is a program run by Habitat for Humanity – Lakeside which aids people, including the elderly and those with special needs, with housing rehabilitation and repairs when the owners cannot afford to, or are not physically able to perform the work themselves. Sheboygan has many services available, and as a result public comments have not revealed additional need for services targeted at special needs populations. These populations do need continued support and agencies aimed at providing for the needs of these populations will continue to do so, and should consider expanding and altering as the need changes or grows. There is a general need, identified through public outreach, for housing programs in general which might also include these special needs populations.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

N/A

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

According to resident and stakeholder interviews, areas such as downtown Sheboygan including 8th Street, Indiana Avenue and Michigan Avenue are in need of increased and enhanced public facilities including such as enhanced beautification, addressing exterior building code violations on commercial businesses and filling vacant commercial and retail space. The Harbor Centre Business Improvement and the City of Sheboygan recently completed a downtown master plan to guide redevelopment in the downtown. This plan identified three strategic areas that should be focused on: 1.) Arts, Culture, and Food, 2.) Housing and Urban Development and 3.) Improve connections and cross-marketing.

Like most communities, Downtown Sheboygan has areas that in need of redevelopment. One particular area of focus is the S. 8th Street segment north of the 8th Street bridge. Plan are underway to building more housing in these areas and to bring more street appeal to those traveling through this corridor to access the heart of downtown Sheboygan. Sheboygan's downtown, Riverfront and South Pier Districts are all in CDBG qualified census tracts.

The City has implemented a successful historic preservation façade renovation and signage grant program. Stakeholders have indicated the need to continue these programs to supplement business owners when they are undertaking façade improvements. With limited funding, the program has been recently been changed to focus prioritize funds to the downtown area versus eligible census tract city-wide.

The South Pier District where the City has invested CDBG funds in the past contains over 20 acres of undeveloped municipally owned parcels. If the Harbor Centre continues to attract its share of anticipated growth with the City, the next ten years could witness the addition of more than 1,300 workers, and nearly 400 new residential units, with increased consumer demand of more than \$11.5M. With these new economic advances, the need for additional public facilities will rise and one source of potential funding is the City's CDBG program.

How were these needs determined?

City needs were prioritized based on input from the public survey, community meetings and the recently completed 2014 Harbor Centre Master Plan. One focus group meeting was held with City departments and outside economic development agencies that assist the city staff with advancing the City's economic development goals.

Describe the jurisdiction's need for Public Improvements:

Like most Midwestern cities, Sheboygan's infrastructure is aging and with limited resources available from property taxes, the number one concern about public improvements that was received from the on-line community survey was fixing Sheboygan roads. Areas with low to moderate income residents and areas with high concentrations of rental properties are experiencing aging housing stock in need of repairs. The CIP addresses handicapped accessibility concerns in our local parks, and the needs throughout Sheboygan with streets, street lighting, parks, recreational centers, sidewalks, park improvements and renovations. The City will continue throughout this planning period covered by this plan to fund street improvements, street lighting, storm water improvements in LMI qualified neighborhoods. The City uses CDBG funds match to CIP funds to complete these projects.

In 2010, the City Police Department changed its focus to a Community Policing model. This model assigned neighborhood officers to the City's 72 police districts. With this change, a partnership was developed between the Police Department and Building Inspection Division to complete enhanced code enforcement in neighborhoods that have seen an uptick in crime related incidents. The City adopts the International Property Maintenance Code which requires property owners to keep building exteriors up to date to ensure Sheboygan's neighborhoods remain safe and attractive. Sheboygan funds portions of the code enforcement officers' salaries to continue to partner with the Police Department to address code violations. We also fund community service officers to assist with crime prevention services in targeted neighborhoods.

City planning staff also has neighborhood development planners focused to working with grassroots neighborhood organizations to form neighborhood associations in all 72 police district neighborhoods to encourage residents to take a role in ensuring their neighborhoods stay safe and clean. Planning staff will also continue to encourage utilization of the City's housing rehabilitation programs to assist low income households with making repairs to the aging housing stock or should they be given code enforcement orders.

How were these needs determined?

City needs were prioritized based on input received from the online survey and from on-going discussions in the local newspaper about the deteriorating City infrastructure.

Describe the jurisdiction's need for Public Services:

The City of Sheboygan has historically funded public service agencies with CDBG funds. Support services that are provided include, but not limited to: case management, education, budget and credit counseling and home ownership training. Funding allocations are also directed to

agencies that assist our LMI residents to holding a job. Services may include daycare funding assistance, transportation through our Public Transit system and assistance to purchase bus tokens to be distributed to residents of shelters to access employment. The City plans to continue to provide and improve on supportive services and policies that encourage support services. The City will also continue to provide funding to shelters in this community that have historically run close to full occupancy.

How were these needs determined?

City needs are determined based on the United Way Community Needs Assessment. The online survey that was completed as part of the outreach of this plan also indicated the need to continue to fund public service agencies that assist the public in a number of beneficial ways.



Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

While housing opportunities can be limited by household income and purchasing power, the lack of affordable housing options can result in a significant hardship for low-income households, preventing them from meeting other basic needs. Low-income residents often have fewer financial resources available for making monthly rent or mortgage payments. Those low-income residents who do choose to purchase a home must keep even more funds for taxes, insurance, home maintenance, and repairs. In 2010, 63.8% of the housing units in the City were owner-occupied and 36.2% of the housing units were rented. Homeownership rates have improved slightly since 2000. Ratios in 2000 were 61.1% owner occupied units in the City of Sheboygan.

According to the United Way of Sheboygan County, Community Needs Assessment, 2013, the local housing market suffered after the economic downturn in 2007. In 2012, home sales returned to pre-recessional numbers. In 2005, 1,584 homes were sold and that dipped down to just 864 homes in 2010. By 2012, the number increased back to 1,205 homes. The Median Sale price has changed significantly as a result of the recession as well. The Wisconsin Realtors Association calculates the Median Price using summary data of sale prices of existing homes provided by multiple listing service (MLS) in the area. While more houses are being sold in 2012 and 2013, they are selling at a lower price point. 2013 data shows an increase in the median sale price which is a positive economic indicator.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

The City of Sheboygan's housing stock was comprised of 22,480 housing units in 2011.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	12,842	57%
1-unit, attached structure	526	2%
2-4 units	5,180	23%
5-19 units	1,868	8%
20 or more units	1,674	7%
Mobile Home, boat, RV, van, etc	390	2%
Total	22,480	100%

Table 26 - Residential Properties by Unit Number

Data Source: 2007-2011 ACS

Unit Size by Tenure

	Own	ers	Ren	ters
	Number	%	Number	%
No bedroom	42	0%	347	5%
1 bedroom	167	1%	1,842	25%
2 bedrooms	2,909	22%	3,558	48%
3 or more bedrooms	9,829	76%	1,607	22%
Total	12,947	99%	7,354	100%

Table 27 - Unit Size by Tenure

Data Source: 2007-2011 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

As of 2013, there were 242 families residing in the City of Sheboygan's public housing units. Over the past ten years, there have only been two new low-income housing structures added to the market. Both of the developers were restricted to 55 years of age or older. In 2015, a new low-income building of 42 new units is proposed. This development will take advantage of the Low-Income Housing Tax Credit program administered by WHEDA. In tax credit developments, the developer receives subsidy to assist with the construction costs. The subsidy allows the developer in charge to rent that is below market rate. These units are targeted to households at or below 80% of the county's median housing income. The proposed development at the

former Washington School on the City's north side provide entry level housing opportunities for the more than 1,600 open positions in Sheboygan County.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The City does not expect to lose any affordable housing units from the inventory during this period.

Does the availability of housing units meet the needs of the population?

The availability of housing units does not fit the needs of the population of Sheboygan. There is a lack of decent affordable housing units for larger families (3 or more bedrooms). They compromise was realized with the larger Asian population and the family structure typically includes the elderly parent residing with the children. Additionally the vacancy rates for both elderly/accessible units is quite low indicating the need for additional units of this housing.

Describe the need for specific types of housing:

Quality, affordable housing for extremely low-income and low-income households.

Quality, affordable housing for larger, low-income families with 3 or more bedrooms.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	87,500	118,000	35%
Median Contract Rent	412	502	22%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	3,705	50.4%
\$500-999	3,560	48.4%
\$1,000-1,499	34	0.5%
\$1,500-1,999	12	0.2%
\$2,000 or more	43	0.6%
Total	7,354	100.0%

Table 29 - Rent Paid

Data Source: 2007-2011 ACS

Housing Affordability

% Units affordable to Households	Renter	Owner
earning		
30% HAMFI	745	No Data
50% HAMFI	3,480	1,115
80% HAMFI	5,925	4,025
100% HAMFI	No Data	6,025
Total	10,150	11,165

Table 30 – Housing Affordability

Data Source: 2007-2011 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$545	\$647	\$803	\$1,054	\$1,085
High HOME Rent					
Low HOME Rent					

Table 31 – Monthly Rent Source: United Way of Sheboygan County, 2013

Is there sufficient housing for households at all income levels?

One group that may have particular trouble finding sufficiently-sized rental units is households with children, as well as households of the Asian population. A rule of thumb for determining whether there are an adequate number of rental units for households with children are the number of units with three or more bedrooms.

How is affordability of housing likely to change considering changes to home values and/or rents?

Neighborhood revitalization through rehabilitation or replacement of existing, lower value housing stock is a significant political and administrative priority in the City of Sheboygan, non-profit organizations, and an emphasis in this consolidated plan. This is resulting in a focused effort in terms of funding and human resources. In the mid- to long-term and within the next 5 years, this will result in an increase in home values and an increase in the availability of affordable rental housing.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Fair market rents are moderate for the area and are on-par with HUD-defined HOME rent levels. This underscores the lack of affordable housing in the area.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Definitions

HQS define "standard housing" and establish the minimum criteria for the health and safety of program participants. Current HQS regulations consist of 13 key aspects of housing quality, performance requirements, and acceptability criteria to meet each performance requirement. HQS includes requirements for all housing types, including single and multi-family dwelling units, as well as specific requirements for special housing types such as manufactured homes, congregate housing, single room occupancy, shared housing, and group residences.

Condition of Units

Condition of Units	Owner-	Occupied	Renter	-Occupied
	Number	%	Number	%
With one selected Condition	3,058	24%	3,054	42%
With two selected Conditions	69	1%	122	2%
With three selected Conditions	0	0%	54	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	9,820	76%	4,124	56%
Total	12,947	101%	7,354	101%

Table 32 - Condition of Units

Data Source: 2007-2011 ACS

Year Unit Built

Year Unit Built	Owner-0	Occupied	Renter-Occupied		
	Number	%	Number	%	
2000 or later	466	4%	137	2%	
1980-1999	1,707	13%	1,601	22%	
1950-1979	4,912	38%	2,868	39%	
Before 1950	5,862	45%	2,748	37%	
Total	12,947	100%	7,354	100%	

Table 33 – Year Unit Built

Data Source: 2007-2011 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number % Number		%	
Total Number of Units Built Before 1980	10,774	83%	5,616	76%
Housing Units build before 1980 with children present	160	1%	370	5%

Table 34 - Risk of Lead-Based Paint

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

The majority of the housing units in the City were built prior to 1950. With the city's targeted code enforcement program, a large number of the exteriors of the units have been rehabilitated. The interior of the units are still in need of repair, updating and accessibility requirements being met. As housing ages, maintenance costs rise, which can present significant costs for LMI homeowners. Therefore, the City of Sheboygan will continue to utilize the revolving loan program housing rehabilitation program to update these properties.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Exposure to lead based paint represents one of the most significant environmental threats from a housing perspective. Housing conditions can significantly affect public health. Many residential properties built before 1978 contain lead based paint. City estimates indicate approximately 16,000 housing units were built before 1978, and assumed to have lead hazards. The City has been very successful in the past obtained HUD Office of Healthy Homes and Lead Hazard Control funds to assist with lower the risks of lead poisoning in household with children under the age of 6 years. Over the past nine years, the City has assisted with funding to control lead concerns in over 500 units of low to moderate income households. Due to the majority of housing stock being pre-1978, the City will continue to target these properties with funding to assist with controlling lead concerns.

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OMB Control No: 2506-0117 (exp. 07/31/2015)

MA-25 Public and Assisted Housing - 91.210(b)

Introduction

Totals Number of Units

				Program [*]	Гуре				
	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total	Project -	Tenant -	Specia	l Purpose Vouc	cher
					based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units									
vouchers									
available			240	186			0	0	0
# of accessible									
units									
*includes Non-Eld	erly Disable	d, Mainst	tream One	-Year, Ma	instream F	ive-year, a	and Nursing I	lome Transi	tion

Table 36 – Total Number of Units by Program Type

Source:

Sheboygan Housing Authority, 2014

Describe the supply of public housing developments:

The developments are older, there are two 105 unit buildings that were constructed in the early 1970s. These buildings are seeing some increased structural needs, such as efficiency upgrades in electrical, heating and plumbing systems. These needs are currently being evaluated and will be addressed in our Green Physical Needs Assessment which will be completed by the end of the month. The supply of housing meets the basic needs of the community along with other subsidized housing. Our waiting list for our one bedroom and efficiency apartments is typically not more than three months. There is a shortage of units for families, where our wait list is typically two to three years. We have a limited number of family units, with four three bedroom units and 25 two bedroom units. The greatest need seems to be in three and four bedroom units. There are other subsidized and affordable housing opportunities in the community as well, however they are often times harder to access as the admission policies have become stricter of time.

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OMB Control No: 2506-0117 (exp. 07/31/2015)

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:.

The City Housing Authority consists of 5 facilities, one of which is a high rise located in downtown Sheboygan. There are accessible units in all of the Housing Authority properties. The Housing Authority is considered high achieving by HUD's scoring criteria.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 37 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

As stated above most of the units owned and operated by the Housing Authority are nearing 40 years old. General maintenance has been undertaken in most of these units, but aesthetic updates are needed like new cabinetry, flooring, etc. In the next year, based on a recommendation from HUD, the Authority will be carpeting most of the units due to the deterioration of the tile floors.

Describe the public housing agency's strategy for improving the living environment of lowand moderate-income families residing in public housing:

The Authority has a resident's services department that is responsible for programming in the facilities. There are also tenant organizations that operate similar to the neighborhood association to work together to solve issues and concerns and be a voice for the residents. Also since the majority of the properties are located near downtown Sheboygan, residents are able to participate in a number of the activities that occur downtown, like the Twilight Concert Series that is held at Fountain Park during the summer.

MA-30 Homeless Facilities and Services - 91.210(c)

Introduction

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds		nt Supportive sing Beds
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	36		37		
Households with Only Adults	37				
Chronically Homeless Households					
Veterans	4				
Unaccompanied Youth	4				

Table 38 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Mainstream mental health and health services are poor and overburdened. Locally the expansion of a federally funded clinic will expand availability to the low income population including those who are or are at risk of homelessness. All housing providers also provide contact information and locations for low cost health providers.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Salvation Army – Emergency Shelter for Families and individual

Safe Harbor – Domestic violence shelter and transitional living assistance for survivors

Interfaith Hospitality Network – Transitional living facilities for families

Lutheran Social Services - Emergency and transitional living for unaccompanied youth; PATHs transitional living services for teens aging out of foster care.

Lakeshore CAP – Intake screening and supportive services for homeless or at risk families and individuals. Rental assistance, transportation assistance are available as direct aid.

MA-35 Special Needs Facilities and Services – 91.210(d) Introduction

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Services are needed for mental health and chemical dependency, transportation, medical needs, connecting people with resources, knowledge required to access available services, case management advocacy, rental assistance with supportive services, and many others.

Examples of a few of the agencies and/or programs that provide services to the above populations that address those needs are:

Sheboygan Housing Authority – Housing voucher programs

Lakeshore Community Action Program – Emergency housing, rental assistance and case management services

Partners for Community Development – Various housing and weatherization programs

Safe Harbor – A wide array of services including emergency housing for victims of domestic violence and sexual assault and other financial and supportive assistance

Salvation Army – Emergency lodging and other financial assistance for Eastern Sheboygan County

Sheboygan County Health & Human Services – various financial programs for emergency housing

Sheboygan County Interfaith Organization/Bridgeway House – Various programs and supportive services

Society of St. Vincent de Paul – Various financial programs for emergency housing

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

These individuals are briefed describing their benefits prior to release. They are put in touch with the local housing authority and given a place on the list for subsidized housing. Their housing costs become income dependent, and if federally subsidized housing is not available, the state through the local regional care district finds them appropriate living arrangements

and bears the cost. These are most often CBRF's offering an appropriate level of care and supervision.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City of Sheboygan will continue to support the programs and services that provide housing assistance listed above. In addition to these services, the City will provide qualified LMI residents with no and low-interest loans to aid in the rehabilitation, repair, and adaptation/modification for accessibility to their homes. Other programs in Sheboygan such as Partners for Community Development, Habitat for Humanity, and Rebuilding Together offer similar services to qualified households.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

This does not apply to the City of Sheboygan.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Sheboygan, Analysis of Impediments to Fair Housing report identified several barriers to affordable and fair housing as well as housing choice. Below is the impediments identified in the study:

- 1. Lack of housing units accessible to persons with disabilities.
- 2. Inadequate affordable housing supply relative to resident income.
- 3. Flawed City Fair Housing Ordinance (this was updated in 2013).
- 4. Racial/Ethnic Segregation and Linguistic Isolation.
- 5. Housing Choice Vouchers Availability
- 6. Frequent attacks on the community reinvestment act by banking regulators.



MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The job market in Sheboygan County and the City of Sheboygan has been quite strong for entry-level positions in 2014. The current unemployment rate in October 2014 was 4.8%. Wisconsin as a whole had an unemployment rate in October 2014 of 5.4 percent.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	152	25	1	0	-1
Arts, Entertainment, Accommodations	1,865	2,309	9	10	1
Construction	634	646	3	3	0
Education and Health Care Services	3,146	5,741	15	24	9
Finance, Insurance, and Real Estate	991	1,576	5	7	2
Information	175	123	1	1	0
Manufacturing	7,223	5,488	35	23	-12
Other Services	794	1,048	4	4	1
Professional, Scientific, Management Services	942	1,362	5	6	1
Public Administration	0	0	0	0	0
Retail Trade	2,077	2,494	10	11	1
Transportation and Warehousing	459	320	2	1	-1
Wholesale Trade	781	562	4	2	-1
Total	19,239	21,694			

Table 39 - Business Activity

Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	26,286
Civilian Employed Population 16 years and over	24,229
Unemployment Rate	7.83
Unemployment Rate for Ages 16-24	23.35
Unemployment Rate for Ages 25-65	5.79

Table 40 - Labor Force

Data Source: 2007-2011 ACS

Occupations by Sector	Number of People
Management, business and financial	3,391
Farming, fisheries and forestry occupations	894
Service	3,066
Sales and office	5,374
Construction, extraction, maintenance and repair	1,481
Production, transportation and material moving	2,989

Table 41 – Occupations by Sector

Data Source: 2007-2011 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	19,877	86%
30-59 Minutes	2,254	10%
60 or More Minutes	1,105	5%
Total	23,236	100%

Table 42 - Travel Time

Data Source: 2007-2011 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labo		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	1,473	214	888
High school graduate (includes equivalency)	6,765	627	1,629
Some college or Associate's degree	6,609	467	1,208
Bachelor's degree or higher	4,494	137	423

Table 43 - Educational Attainment by Employment Status

Data Source:

2007-2011 ACS

Educational Attainment by Age

			Age		
	18-24 yrs	25-34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	141	127	307	656	653
9th to 12th grade, no diploma	569	514	436	535	658
High school graduate, GED, or alternative	1,956	2,401	1,952	4,669	3,944
Some college, no degree	1,429	1,918	1,752	2,482	933
Associate's degree	159	472	713	967	157
Bachelor's degree	365	965	883	1,803	471
Graduate or professional degree	13	209	383	816	414

Table 44 - Educational Attainment by Age

Data Source:

2007-2011 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	20,306
High school graduate (includes equivalency)	28,041

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OMB Control No: 2506-0117 (exp. 07/31/2015)

Educational Attainment	Median Earnings in the Past 12 Months
Some college or Associate's degree	31,830
Bachelor's degree	42,092
Graduate or professional degree	57,926

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2007-2011 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors in Sheboygan are:

- 1. Manufacturing
- 2. Health Care and Education
- 3. Retail Trade
- 4. Tourism

These sectors accurately show the make-up of Sheboygan's employment activity. Sheboygan has historically been a blue-collar manufacturing community. Sheboygan location on Lake Michigan and its waterfront activities also drive a lot of the retail trade and tourism that occurs in this market.

Describe the workforce and infrastructure needs of the business community:

As of November 2014, there were 1,600 open positions in Sheboygan County. This number is expected to rise in 2015. The lack of well-trained skilled workers in industrial, manufacturing trades in Sheboygan continues to be an issue. There is also a need to attract and retain talent in Sheboygan. Infrastructure is very important in a manufacturing community to transport raw and finished products. And the lack of market-rate modern housing has also posed a problem to attracting and retaining skilled workers in the market.

According to a recently released housing study prepared by the Sheboygan County Economic Development Corporation, the top thirty privately held employers in Sheboygan County are located within 14 miles or less Downtown Sheboygan and employ close to 70 percent of workers in the County. 8,658 workers commute into the county on the daily basis for work. The multi-family rental market with the City is

strong due to low or no vacancies in the survey of over 2,809 apartments in the County. High quality rental housing is a must to attract new talent to the market and priority of the City of Sheboygan.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The City has prioritized new economic for the period of this plan. Three key projects are proposed in attempting to bring new employers to the area to expand. The first is the purchase of the Schuchardt property on the City's western side. This property provides up to 180 acres of development space for technology and residential development. The second major project is the redevelopment of the former vacant Boston Store in downtown Sheboygan. This 5 acre parcel located in Sheboygan's central business district provides opportunity for new mixed used development. The last opportunity is the expansion to the west of I-43 for industrial development. The City will continue to promote the Business Development Revolving Loan program funded with CDBG funds to assist with the expansion of new businesses in the city.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Sheboygan is lacking in skilled labor sets of employers. One particular area that is need of assistance is IT and skilled maintenance/troubleshooting manufacturing machines.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Efforts are underway between the business community, the technical colleges and local school district to bring training into the schools to promote the workforce opportunities to undergraduate students. City planning staff continue to work with local groups to address these concerns and will provide assistance as required to address this concern.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

The City does participate in the CEDS process through the Bay-Lake Regional Planning Commission. The report is forwarded to the Economic Development Administration. Currently the City of Sheboygan does not qualify for funding under this organization.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The following are the broad objectives of Sheboygan's Economic Comprehensive Plan:

- Build a self-sustaining economy
 - o Actively pursue economic diversification to increase professional level employment in the community.
- Focus on the City's Center
 - Aggressively promote infill and redevelopment to utilize lands with existing city services and strengthen the City's tax base.
- Revitalize our Neighborhoods
 - o Diversify the City's housing stock to appeal to more residents. Continue the community policing approach.
- Capitalize on Lake Michigan
 - Advance redevelopment and infill projects proximate to Lake Michigan as high-value opportunities including South Pier,
 Indiana Avenue and lake sites.
- Cultivate the Arts and other Cultural Assets3
 - Work with community organizations building off of existing assets to coordinate and promote the arts, cultural facilities and events for local residents and tourism development.

All of the above objectives can take place in CDBG eligible census tracts.

MA-50 Needs and Market Analysis Discussion

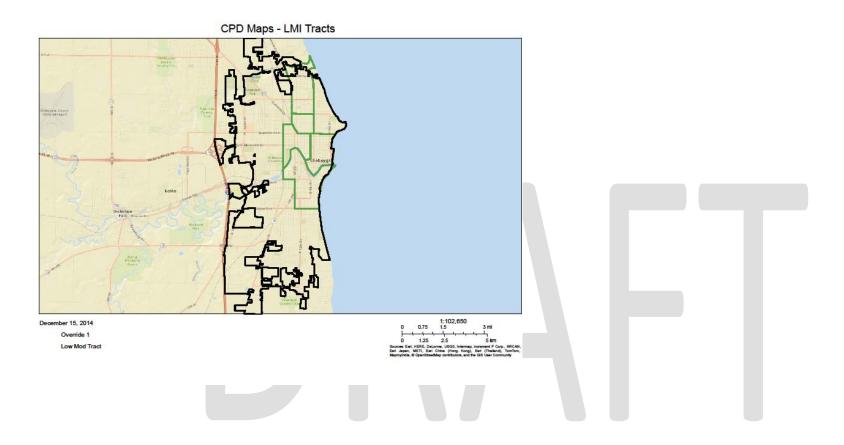
Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

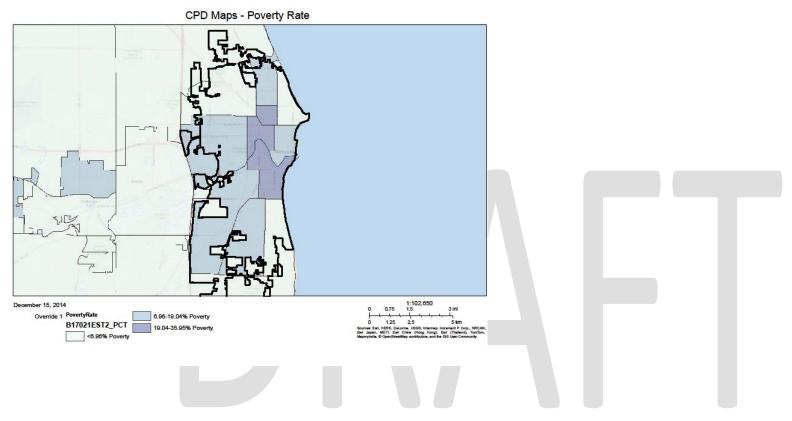
Much of Sheboygan's housing stock was built prior to 1950. Due to age, the central city housing stock has the highest concentration of multiple housing problems, and specifically, need for ADA modifications. During the public outreach process, respondents referred the upkeep and appearance of this housing stock being a concern.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

There is a larger concentration of ethnic and racial minorities, as well as low and moderate-income families in the center of the city. As illustrated by the maps below, Sheboygan's central city also contains all of the low and moderate income census tracts as defined by HUD (census tracts 2.02, 2.01, 5, 114, and 8). Census tracts 5, 8, and 2.01 hold a larger number of households under the poverty rate (see map). In these three census tracts not only have the city's highest poverty rates, but also show high numbers of households bearing a housing cost burden, with census tract 5, directly in Sheboygan's center, at the highest rate of housing cost burden (44.09%).

Please see section NA-30 for maps of census tracts with high concentrations of ethnic and racial minorities. The tracts that show these rates are 2.01, 5, 10, and to a lesser extent tracts 1 and 114.





What are the characteristics of the market in these areas/neighborhoods?

Areas in which housing problems and low-income populations are concentrated typically have older housing stock, higher rates of renter-occupied versus owner-occupied, higher vacancies and foreclosures, higher crime and perceived crime rates, and higher rates of code violations. All of these aspects contribute to a diminished quality of life. Property values are typically lower in these areas, and housing stock deteriorates at a higher rate due to lack of funds to allocate to repairs, high rental and turnover rates, and the age of the housing. Most of these neighborhoods are within walking distance to commercial corridors, but are farther from large-scale discounted retailers.

Are there any community assets in these areas/neighborhoods?

There are many community assets located within or very near these neighborhoods. Sheboygan lies on the shore of Lake Michigan, arguably our largest asset, and many of these neighborhoods abut the lakefront, or are within a very short distance. The central location of these neighborhoods also puts them near Sheboygan's downtown core and up and coming Arts, Culture and Food District. These neighborhoods are very near local shops and restaurants as well as civic and cultural amenities such as the Mead Public Library, City Hall, the John Michael Kohler Arts Center, the Children's Museum and the Weill Center for the Performing Arts. Sheboygan also has abundant parks throughout its central city, pedestrian sidewalks and trails, and a metro transit system. Sheboygan's core also has several service and non-profit agencies with targeted outreach and services for low-income families.

Are there other strategic opportunities in any of these areas?

The city of Sheboygan has targeted the areas with the oldest housing stock and highest concentrations of racial/ethnic minorities and low-income families for CDBG funding and revolving loan Housing Rehabilitation Loan Program. The program is designated towards code enforcement, each year two neighborhoods are targeted, and allows qualifying households to borrow funds to make necessary repairs for low or no interest. While only two neighborhoods are targeted per year for code enforcement walkthroughs, any qualifying household that is proven to have low or moderate-income can apply for the program at any time.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan outlined in the following sections provides comprehensive procedures for how the City of Sheboygan will continue to maintain compliance in managing its federal grant funds received by addressing market conditions, geographic distribution of needs and priorities in the City, the resources expected to be available to meet the goals and how those barriers may be overcome.

The City of Sheboygan's Community Development Strategy focusing on five priorities:

- 1. Collaboration with the City's public service agencies to work towards a community need.
- 2. Building upon the City's strength especially in the employment sector.
- 3. Community and political will to respond to urgent needs and make tough decisions in a timely manner.
- 4. Leveage community policing and neighborhood associations to ensure safe and clean neighborhoods.
- 5. Infrastructure improvements to assist local employers in expansion and provide safe roadways for city residents.

Within this context, this Consolidated Strategic Plan call for alignment of the City's funds over the next five years around its priorities.

SP-10 Geographic Priorities – 91.215 (a)(1)

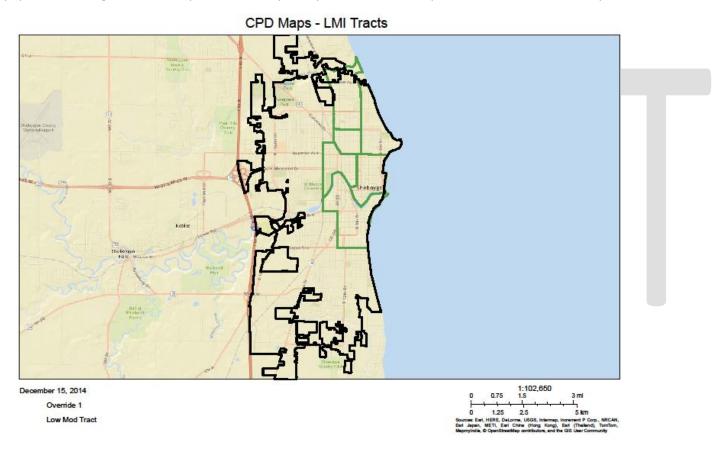
Geographic Area

Geographic priorities will be focused on LMI Census tracts as identified by HUD. Those tracts are: 2.02, 2.01, 5, 114, and 8. A map of these can be found below.

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Sheboygan will focus funds in Low and Moderate-income census tracts, as shown in the map below. The City's Planning & Development staff will identify specific housing or community needs within priority areas based on reported data from community residents and other non-profit



stakeholders

SP-25 Priority Needs - 91.215(a)(2)

Priority Need/Goals	Population	Priority Need2	Geographic Areas Affected	Basis for the Relative Need
Affordable Housing				
Make repairs or rehab existing income- eligible owner occupied housing to address building code issues	Extremely Low, Low, Large Families, Families with children, individuals, veterans, elderly, disabled, persons with HIV/AIDS	High	LMI Qualified Neighborhoods	There are owner-occupied housing units that are in need of redevelopment
Assist income-eligible households into homeownership.	Extremely Low, Low, Large Families, Families with children, individuals, veterans, elderly, persons with physical disabilities	High	Census Tracts 2.01, 2.02. 5, 114, 8	Provide assistance with down payment and closing costs to help lower income households.
Assist owners of rental properties to develop or improve rental housing for lower income households	25 rental properties rehabbed to be code compliant and made more affordable	High	LMI Qualified Neighborhoods	There are rental units in need of redevelopment.
Neighborhood Revitalization				
Increase safety, provide crime protection and foster building code compliance in locally selected areas.	Extremely Low, Low, Large Families, Families with children, individuals, veterans, elderly, persons with physical disabilities	High	Census Tracts 2.01, 2.02. 5, 114, 8	Crime prevention and building code enforcement in core city neighborhoods.
2. Foster and create new neighborhood associations in partnership with Sheboygan Neighborhood Pride and Sheboygan Police Department.	City-wide initative with a focus on central core neighborhoods.	High	City-Wide	Empower residents in neighborhoods
3. Initiate improvement efforts in locally- selected geographical areas.	Qualified Census Tracts	High	Qualifed Census Tracts	Deteriorating streets and public facilities
Anti-Poverty Strategy				
1. Reduce incidents of homelessness	Homeless or at-risk for homelessness	High	Central Core Neighborhoods	Point in Time Count
Economic Development	·			

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Provide assistance for central commercial zone businesses to complete Historic Preservation projects.	Businesses located in the City center (downtown) and qualified census tract.	Medium	Central Commercial Districts- Downtown	Blighted, vacant, underutilized properties
Create full-time permanent jobs at living wages.	LMI persons	High	City-wide	New LMI jobs
Foster commercial redevelopment projects in locally selected areas.	Redevelopment sites located in City Center (downtown and qualifed census tracts.	Medium	Central Commercial Districts- Downtown	New tax base, new jobs, new aesthetics.

Priority Needs

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence
	the use of funds available for housing type
Tenant Based Rental	Like most communities, Sheboygan has a need for more TBRA to make rents more affordable, the City does not anticipate
Assistance (TBRA)	spending CDBG funds on this need.
TBRA for Non-Homeless	The City does not anticipate prioritizing any programs which are TBRA for Non Homeless Special Needs.
Special Needs	
New Unit Production	New unit production in the City of Sheboygan in the past 10 years has been relatively flat.
Rehabilitation	The City has a well-established housing rehabilitation
	Program that has been in existence since 1987 and has sufficient funding in the revolving loan fund. Sheboygan has
	experienced a few foreclosures as result of the mortgage crisis, but not on the level of other communities.
Acquisition, including	Since the majority of the housing stock in Sheboygan is pre-1950, more houses will be demolished making way for new
preservation	homes.

Table 46 - Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction: The following table outlines the anticipated resources to include CDBG that the City anticipates having available during the 2015-2019 period covered by this Consolidated Plan.

Anticipated Resources

Program	Source	Uses of Funds	Exp	ected Amount	t Available Year	1	Expected	Narrative Description
	of		Annual	Program	Prior Year	Total:	Amount	
	Funds		Allocation:	Income: \$	Resources: \$	\$	Available	
			\$				Reminder of	
							ConPlan	
							\$	
CDBG	Public-	Admin & Planning	\$863,000	\$10,000		\$873,000	\$825,000	The City of Sheboygan CDBG
	Federal	Economic				, ,	. ,	program has seen on average
	. cae.a.	Development						of 1% decrease year over year
		Housing Rehabilitation						for the past 8 years. Due to
		Public Services						concerns at the Federal Level
		Public Facilities						the City is cautious over what
		Neighborhood						the continued allocations will
		Improvements						be.
		Street Improvements						
		Historic Preservation						

Table 47 - Anticipated Resources

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 federal funding that is listed above is funding which received annually to support activities outlined in this plan. Although there are no guarantees of this funding, particularly in the current budget environment, the City has historically received these funds and expect to continue to receive CDBG funds for the period covered by this Plan.

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 Sheboygan does not intend to address the needs of this plan with publically owned land or property within the jurisdiction.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Responsible Entity		Geographic Area Served	
	Туре			
City of Sheboygan	Dept. of Planning and	Administration of	LMI qualified Census	
	Development	Federal Funds	Tracts in the City of	
			Sheboygan	

Table 48 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Overall, the City of Sheboygan's community development delivery system has a commitment of partner agencies that work to achieve the goals year over year. The City continues to focus resources on the greatest needs/priorities of the community. This information is gathered from the United Way Community Needs Assessment. The City continues to streamline the process, but still gather the necessary data to report to HUD.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV					
Homelessness Prevention Services								
Counseling/Advocacy	X	X						
Legal Assistance	X	X						
Mortgage Assistance	X	X						
Rental Assistance	Х	Х						
Utilities Assistance	X	X						
	Street Outreach Se	ervices						
Law Enforcement	X							
Mobile Clinics								
Other Street Outreach Services	X							
	Supportive Serv	rices						
Alcohol & Drug Abuse	X	Χ						
Child Care	X	X						
Education	X							
Employment and Employment	X							
Training								
Healthcare	X							
HIV/AIDS	X							
Life Skills	X							
Mental Health Counseling	X	X						
Transportation								

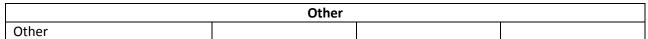


Table 49 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The organizations that deliver the services listed above are all members of the Sheboygan County Housing Coalition. Should homeless individuals or families, including veterans and unaccompanied youth, present themselves for services at either a Food Pantry, or at the Lakeshore Medical Clinic, they are referred to the Sheboygan Housing Assistance Center for assessment. Youth are reached on the street by a program of Lutheran Social Services called RAYs, and also brought into the continuum of care. Housing assistance is one gateway into a network of assisting agencies that have specific competencies in the areas of health care, living skills, and transportation.

Rental and Utility assistance is offered by a variety of agencies and again coordinated by SHAC through several funding sources including CDBG and HUD ESG grants. A percentage of the Federal Dollars granted the Local continuum are designated for prevention activities – i.e. money spent to keep vulnerable families housed.

Veterans services are coordinated by the regional VA office in Brown county and through local county Veteran's offices. Specific funds for housing are available for veterans and are accessed directly and by referral from SHAC.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Due to the aging infrastructure in Sheboygan and changes in policies for housing assistance, the institutional delivery systems in Sheboygan are a still catching up to addressing long-term housing needs of the community.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The Department of Planning and Development will work with the City Engineering Division, Sheboygan Redevelopment Authority, City Building Inspections Division and the City's Finance Department to coordinate and enhance the services provided by this funding and to maximize the impact on the community. The Department of Planning and Development Department will continue to work with the Finance Department to review the process used in the IDIS system.

The Planning and Development office will continue inputting beneficiary data into the IDIS system. Both the Planning and Development office and the Finance Department will work on updating and adding documentation to the IDIS system. Interdepartmental meetings are held to address concerns between the different offices.

The major strength in this delivery system is that the City public service organizations, housing agencies, and City Departments operate in a small geographic environment. As a result of this, communication and coordination between organizations is relatively easy. Gaps in delivery of services in Sheboygan are not related to institutional issues, but rather in insufficient funding.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort					Geographic	Needs		
Order	Goal Name	Start Yr	End Yr	Category	Area	Addressed	Funding	Goal Outcome
1								
	Repair Aging	2015	2020	Affordable Housing	LMI Census	Neighborhood	RLF	Rental Units: 25
	Housing				Tracts	Revitalization		
	Infrastructure							Owner/Occupied: 60
2	Homeownership	2015	2020	Affordable Housing	LMI Census	Affordable	EN	Homeowners Helped: 15
	Assistance			Homeless	Tracts	Housing		
3	Increase Safety/	2015	2020	Neighborhood	Police	Neighborhood	EN	Police Districts: 10
	Crime Protection/			Revitalization	Districts	Revitalization		
	Building Code Comp.							
4								
	Foster Neighborhood	2015	2020	Neighborhood		Neighborhood	EN	5 new Neighborhood Assoc
	Associations			Revitalization		Revitalization		
5	Public Infrastructure/	2015	2020	Street Infrastructure	LMI Census	Neighborhood	EN	5 neighborhoods
	Park Improvements				Tracts	Revitalization		
6	Reduce incidents	2015	2020	Affordable Housing		Affordable	EN	1000 persons helped
	of homelessness					Housing		
7	Historic Preservation	2015	2020	Non-Housing		Historic Preser	EN	10 businesses assisted
				Community Dev.				
8	Increase economic	2015	2020	Non-Housing		Economic	RLF	50 jobs created
	opportunities			Community Dev.		Development		
9	Foster commercial	2015	2020	Non-Housing		Economic	EN	2 target areas
	redevelopment			Community Dev.		Development		assisted
10	Alleviate poverty	2015	2020	Non-Housing		Public Services	EN	25,000 persons assisted

& increase self-		Community Dev.		
reliance.				

Goal Descriptions

Goal Name	Goal Description
Repair Aging Housing Infrastructure	The purpose of this goal is to increase the availability, accessibility, affordability, and sustainability of renter and owner-occupied housing units.
Homeownership Assistance	The purpose of this goal is to assist LMI qualified residents with 1st time homebuying assistance and housing counseling including financial and budget counseling.
Increase Safety/ Crime Protection/ Building Code Comp.	Increase the quality of life through outreach to residents of Sheboygan.
Foster Neighborhood Associations	Empower residents take ownership and improve their neighborhoods.
Public Infrastructure/ Park Improvements	Provide safe, adequate infrastructure, public facilities and recreational space.
Reduce incidents of homelessness	This goal includes activities targeted to persons and families experiencing or at risk of homelessness.
Historic Preservation	To preserve the City's ethnic and cultural heritage and architectural character.
Increase economic	To provide LMI persons the opportunity to

opportunities	secure living wage jobs.
Foster commercial	To enhance the local economy and provide
redevelopment	new job opportunities.
Alleviate poverty	Increase self-reliance through services to
& increase self-	youth, victims of domestic violence, food
	program and Neighborhood-based
reliance.	services.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)3.

The City anticipates providing affordable housing to 345 families using CDBG funds.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable.

Activities to Increase Resident Involvements

The PHA facilitates Tenant Organizations in their high-rise facility. These organizations serve as a public forum to talk about building issues and concerns, as well as planning facility programs like social and civil engagements.

Is the public housing agency designated as troubled under 24 CFR part 902?

The City of Sheboygan Public Housing Authority is not considered "troubled".

Plan to remove the 'troubled' designation

N/A

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City of Sheboygan, Analysis of Impediments to Fair Housing report identified several barriers to affordable and fair housing as well as housing choice. Below is the impediments identified in the study:

- 1. Lack of housing units accessible to persons with disabilities.
- 2. Inadequate affordable housing supply relative to resident income.
- 3. Flawed City Fair Housing Ordinance (this was updated in 2013).
- 4. Racial/Ethnic Segregation and Linguistic Isolation.
- 5. Housing Choice Vouchers Availability
- 6. Frequent attacks on the community reinvestment act by banking regulators

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City will address the barriers to affordable housing as discussed above by:

- Connecting residents with resources to provide modifications to make units accessible through such programs as the City's Housing Rehabilitation Program, Partners for Community Development, Rebuilding Together and Habitat for Humanity.
- 2. Work with developers to develop additional income restricted affordable housing units through the conversion of existing vacant buildings.
- 3. The City's fair housing ordinance was updated in 2013 to reflect the current state and federal regulations.
- 4. Partnership with organizations that represent minority groups and encourage involvement in neighborhood associations.
- 5. Petition Federal legislators to increase the funding available for this impediment.
- 6. Encourage banking regulators and our politicians to introduce legislation to encourage affordable housing.

SP-60 Homelessness Strategy – 91.215(d)

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

Addressing the emergency and transitional housing needs of homeless persons

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.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City of Sheboygan will continue to provide the following programs/services to end homelessness by:

- 1. Continued participation in the Homeless Point in Time count.
- 2. Supporting non-profit organizations that provide affordable housing opportunities for low and moderate income individuals and families.
- 3. Providing CDBG funds for programs that help maintain Sheboygan's housing stock, and enable low income individuals to stay in their homes through our Housing Rehabilitation Programs.
- 4. Providing CDBG funds to emergency shelter facilities.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The reduction of Lead Based Paint (LBP) hazards in the city's housing stock is an annual objective in Sheboygan. In the past nine years, the City has been successful with obtaining three HUD lead hazard control grants to control LBP in 530 units of the city. An unsuccessful attempt occurred in 2014 to obtain a new grant, but the City is committed to applying again in 2015 for these funds. In the interim, the City continues to utilize the Housing Rehabilitation Program to address LBP concerns in pre-1978 housing. The city also takes steps to educate homeowners receiving CDBG funds on the hazards and dangers of LBP. The City distributes to all loan applicants the pamphlet Protect your Family from Lead Based Paint.

All projects funded with CDBG that may affect LBP in a pre-1978, a lead risk assessment is completed and any surfaces with lead are controlled and treated.

How are the actions listed above related to the extent of lead poisoning and hazards?

In Sheboygan, children are exposed to lead poisoning as a result of lead painted window and door jambs. Similar to national leading cause of lead-based poisoning is exposure to dust from deteriorating paint in homes constructed prior to 1978. In the city of Sheboygan, almost 24,000 housing units were constructed prior to 1978.

How are the actions listed above integrated into housing policies and procedures?

The City of Sheboygan's policies and procedures call for full compliance and enforcement of lead based paint regulations. Contractors and other community partners are advised of lead-based paint. The prior lead grants in the community has trained approximately 500 landlords, homeowners and contractors on the effects of lead based paint and how to safely work with it. Contractors participating in the City's Housing Rehabilitation Program are required to have lead-certifications licenses from the State of Wisconsin before they can bid on projects that will affect LBP.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City's antipoverty strategy is based on attracting a range of businesses and providing workforce development in cooperation with the Sheboygan County Chamber of Commerce and the area colleges and technical colleges. The strategy includes job training services to low-income residents. In addition, it provides supportive services for target income residents.

Also, the City supports efforts of the local entrepreneur partners which work with low to moderate income individuals interested in starting a new business. Lakeshore Technical College also offers a variety of services to new small business owners to develop their ideas into reality.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City's poverty reducing goals are coordinated through:

- Goals to increase self-reliance and self-sufficiency. This is accomplished with funding through public services to agencies with missions to reflect this. Also services which assist homeless, job training programs, after-school programs and sustainable food programs.
- Economic Development goals to support business creation and expansion to create livable wages to LMI persons.
- Coordination with Lakeshore CAP CoC, Lakeshore Technical College, the United Way of Sheboygan County, to implement important programs aimed at ending and preventing poverty.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

At least once every two years, City staff conducts formal on-site monitoring. These visits are conducted more frequently if the sub-recipient is new or is having difficulty meeting program requirements. Program staff also review monthly and quarterly reports, and analyzes evaluation forms. HUD representatives may also make on-site visits as part of their monitoring visits to the City of Sheboygan. City staff may also make informal visits as needed.

Inadequate Performance and Non-compliance

If a sub-grantee/sub-recipient or its CDBG funded activity is found to be in non-compliance with terms stipulated in the contract, funding may be withheld until compliance is achieved. In the event that compliance cannot be achieved, funding maybe terminated. Additionally, funding maybe withheld from any agency which does not submit required reports in a timely manner. Disbursement will recommence with acceptable reporting procedures.

If program performance is found to be substantially inadequate for the stated objectives, the agency may be required to submit a written explanation for the variance. Inadequate program performance may adversely affect future CDBG funding requests to the City.

An agency may appeal a decision to terminate funding based on information not available to the City at the time of the decision. An appeal must be submitted in writing with documentation included, which justifies or substantiates the appeal. City staff will review the appeal in conjunction with the City legal department. If appropriate, meetings will be arranged between the City and the agency to determine the most appropriate course of action.

Expected Resources

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

Introduction

Anticipated Resources

F	Program	Source	Uses of Funds	Exp	ected Amount	Available Year	r 1	Expected	Narrative Description
		of		Annual	Program	Prior Year	Total:	Amount	
		Funds		Allocation:	Income: \$	Resources:	\$	Available	
				\$		\$		Reminder	
								of ConPlan	
								\$	
	CDBG	Public-	Planning/Administration	\$863,000	\$20,000		\$893,000		With the complexity
		Federal	Public Service						of the political and
			Public Facilities						economic
			Street Improvements						environment at the
			Housing Rehabilitation						federal level, it is
			Neighborhood						difficult to project the
			Revitalization						amount of CDBG
			Housing						funds for the next
			Homebuyer Assistance						Action Plan Period.
			Economic Development						7.00.0

Table 50 - Expected Resources – Priority Table