

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: City of Green Bay

Date: 3/15/2022

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

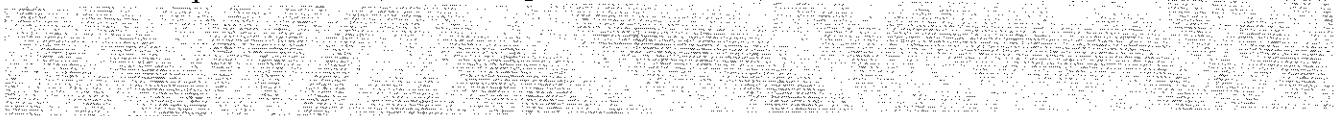
Summarize the consultation process:

The PJ consulted with local PHAs, CoC, and area service providers over the phone, in-person, and virtually. Attached is a list of organizations consulted, and a summary of the feedback received.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Golden House	Type of Agency/Org.	Method of Consultation.	Feedback.
Freedom House	Type of Agency/Org.	Method of Consultation.	Feedback.
NEW Shelter	Type of Agency/Org.	Method of Consultation.	Feedback.
NEWCAP	Type of Agency/Org.	Method of Consultation.	Feedback.
St. John Shelter	Type of Agency/Org.	Method of Consultation.	Feedback.
House of Hope	Type of Agency/Org.	Method of Consultation.	Feedback.
Safe Shelter	Type of Agency/Org.	Method of Consultation.	Feedback.

If additional space is needed, insert image of table here:



Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- **Public comment period: start date - 2/18/2022 end date - 3/10/2022**
- **Public hearing: 10/28/2021**

The City of Green Bay's citizen participation process in drafting the plan included the following:

1. Programs and activities set-up for the Plan have been discussed during meetings by department and division heads, including Planning; Neighborhood Division; Public Works; Parks, Recreation & Forestry; and Economic Development.
2. A public hearing was conducted on October 28, 2021 (published on October 8, 2021) to obtain citizen views on how to address housing and community development needs and to develop proposed activities before publication of the plan for citizen comment.
3. The City published its proposed plan on February 18, 2022 in the official city paper, giving citizens opportunity to review and provide comments. The comment period ran from February 18, 2022 through March 10, 2022, providing sufficient time for the public to review and provide comment. The City also made copies of the full plan available in the Department of Community and Economic Development for review to the public.
4. The City considered all comments or views from citizens received in writing, or orally at the public hearings, in preparing the final plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reason therefor, can be found below.

The City of Green Bay held one public hearing on 10/28/2021 which was conducted virtually via Zoom. The public hearing was attended by two City Staff, one elected official, and three members of the public. Comments received from the public hearing centered around the need for more affordable housing units. Members of the public also expressed the need for an increase in additional mental health services and AODA services.

During the public comment period from 02/18/22-03/10/22 feedback was received emphasizing the need for affordable housing options accessible to people who have physical disabilities. A separate comment was received requesting a grammatical/word usage change in a sentence of the Allocation Plan narrative.

Describe any efforts to broaden public participation:

In addition to placing a public notice in the local newspaper for both the public hearing and public comment period, staff placed notice on the City of Green Bay website, Facebook page, and with local Homeless and Housing Coalition which in turn shared the notices with their personal/professional networks.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

The public hearing was attended by two City Staff, one elected official, and three members of the public. Comments received from the public hearing centered around the need for more affordable

housing units. Members of the public also expressed the need for an increase in additional mental health services and AODA services.

During the public comment period from 02/18/22-03/10/22 feedback was received emphasizing the need for affordable housing options accessible to people who have physical disabilities. A separate comment was received requesting a grammatical/word usage change in a sentence of the Allocation Plan narrative. All comments received during the public comment period and public hearings were considered and discussed during the development of the plan.

Summarize any comments or recommendations not accepted and state the reasons why:

There were no comments or recommendations received which were not accepted.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	+	42	142	#	6								
Transitional Housing	138	36	19	#	21								
Permanent Supportive Housing	99	33	92	#	43								
Other Permanent Housing						#	#	#	#				
Sheltered Homeless						155	99	#	#				
Unsheltered Homeless						59	41	#	#				
Current Gap										59	26	0	0

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	#		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	#		
Rental Units Affordable to HH at 50% AMI (Other Populations)	#		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		#	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		#	
Current Gaps			#

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

QP1. Homeless

According to HMIS Data in March of 2021 there were a total of 1,177 clients served. 83 clients were new to the system, 23 returned to homelessness, and 42 exited to public housing. 50% of clients identified as female and 48.9% as male. 40.8% were under the age of 18 and 47.8% were adults over the age of 18. 3% of the population declared veteran status. Looking at racial makeup 0.2% identified as Other/Multi-Racial, 0.3% as Native Hawaiian or Other Pacific Islander, 1.1% as Asian, 2% did not identify, 16.8% American Indian or Alaska Native, 33% Black or African American, and 47% White. Brown County CoC ranked third highest out of all the Wisconsin CoC's for the largest population of people experiencing homelessness in 2019.

According to HMIS data, in the last year 220 youth were provided shelter: 131 unaccompanied youth, 35 unaccompanied minor youth, and 55 parenting youth. Minority youth are overrepresented among youth experiencing homelessness with minorities making up more than 55% of total unaccompanied youth and more than 65% of parenting youth experiencing homelessness. In the last year, more than half (53%) of youth experiencing homelessness had been homeless previously. It is significant that youth in Brown County are experiencing homelessness more than once.

QP2. At Risk of Homelessness

Though there is no comprehensive report available describing this population, there are a few sources which can shed a light on residents falling within this category.

-According to the 2021 American Community Survey, almost 15%(approx. 14,994 people) of Green Bay's population falls below the poverty line. Out of 46,857 households, over 20% fall below 30%AMI.

-Siting the Balance of State Coordinated Entry Prioritization List for 2020-2021, 156 households were served by homeless prevention services. 20 households were without children and 136 were with children. To date there are 187 households in Brown County currently waiting for services.

-Siting data from the Wisconsin Emergency Rental Assistance Program, 969 households were served. 484 households were individuals and 485 households were with children.

-Looking at data collected by the Green Bay Area Public School district from the 2021-2022 school year 890 students were "doubled up", without stable housing. Additionally there were 134 students identified as "unaccompanied youth" and therefore housing insecure.

QP3. Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking.

According to information from Family Services of Northeast Wisconsin's Sexual Assault Center, In 2021 1,195 survivors were served by the Sexual Assault Center and in 2022 that increased to 1,414 which is almost a 15% increase. Of the 1,414 victims served in 2022, 40 were identified as being trafficked.

Siting data from the Golden House, a local shelter which exclusively serves victims of domestic abuse and violence, their shelter and programs served 2698 clients in 2022. The Golden House provided shelter for 436 residents, 224 adults and 212 children, with a total of 6,549 nights of shelter.

It is important to note that most cases of domestic violence and sexual assaults go unreported. According to the Center for Disease Control, 1 in 3 women and 1 in 4 men will experience sexual violence involving physical contact during their lifetime.

*Note: City staff was unable to locate population specific demographics.

QP4. Other Populations.

Though hard data is limited for defining this population of the City of Green Bay, there are three primary sources to be considered: The utilization of the Housing Choice Voucher Program, the Brown County United Way's Report on the Asset Limited Income Constrained but Employed(ALICE) population, and the 2020 Green Bay Housing Market Study.

To reiterate a statistic cited from the 2021 ACS, approximately 15% of Green Bay's population falls below the poverty line. Looking at the Brown County Housing Choice Voucher Program, to be eligible for a voucher the applicant must meet the income requirement of earning at or below 50% AMI. There is currently a waiting list of 597 applicants which include families and single households. The assumption is being made if someone is applying for rental assistance, that applicant is struggling or unable to pay their current rent. This could also mean they may even be without stable housing and potentially homeless. Additionally, there are 2,410 recipients of the Housing Choice Voucher in Brown County. Approximately 70%(1680) reside in the City of Green Bay. The assumption is being made that if the recipient were to lose their voucher, they would be unable to afford their current housing and becoming at risk of homelessness.

According to the United Way, Asset Limited Income Constrained but Employed households are defined as, "Households that earn more than the Federal Poverty Level, but less than the basic cost of living for the county (the ALICE Threshold)." Households identified as ALICE are unable to afford the basics of housing, child care, food, transportation, health care, and technology. In Green Bay specifically, the combined ALICE and poverty rate is 48%. Based on

this information the argument could be made that 48% of households in Green Bay are struggling to meet their household's financial needs including managing their housing costs.

Siting information from the Green Bay Housing Market Study which sources data from the 2012-2016 HUD Comprehensive Housing Affordability Strategy, 3,870 households who are renters are housing cost burdened and earn 31-50% AMI. 5,974 households who are renters are identified as housing cost burdened and earn less than 30% AMI. Overall, 65% of Green Bay renters are either cost burdened or severely cost burdened.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***
and,
- ***Those at greatest risk of housing instability or in unstable housing situations:***

QP1. Homeless

To date, the daily number of unsheltered homeless ranges from 30-40 (according to street outreach and HMIS area lead). Local service providers state the primary barrier to housing and services for this population is the inability for the community organizations to meet the co-occurring needs of this population. The lead outreach staff from Newcap, Inc. stated through his observation and interactions with this population, the majority are struggling with both severe mental health needs and substance abuse. According to Newcap and other organizations, many service providers are understaffed and underresourced to deal with these co-occurring needs. There is a high need for qualified professionals who can provide mental health counseling and substance abuse support.

Through consulting with local shelters, many are at capacity and operating on a waitlist. The primary reason stated for this is the scarcity of available affordable housing units for their guests. Specifically, the family shelters in the area have guests ready to transition out of shelter, but are unable because there is no affordable housing available for them. Another need expressed by the service provider community is the challenge to find landlords who are willing to accept housing vouchers. The pool of landlords who currently accept housing vouchers is in short supply. In addition to the service providers, this need was also validated by the Brown County Housing Authority who administers the housing voucher program.

QP2. At Risk of Homelessness

As was stated above for the Homeless qualified population, the unmet housing and service needs for those at risk of homelessness are generally the same. Through consultation with service providers and shelters, the predominant needs are the creation of more affordable housing, and

increase in the availability of mental health services, and an increase in the supply of landlords who are willing to rent to households with housing vouchers.

QP3. Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

In speaking with the area's only shelter for domestic violence and sexual assault, the primary unmet needs are the same as the Homeless and At Risk of Homelessness qualified populations. Additionally, it was mentioned that there are insufficient supports available to their guests after they have been housed. Additional check-ins by case management would help increase the likelihood of their clients maintaining permanent housing.

QP4. Other Populations

Through consultation with area service providers and shelters, people who fall in this category are severely housing cost burdened. Referencing the 2020 Housing Market Study, there is an undersupply of 3,715 units. Almost every organization staff consulted with underscored this unmet need. Another factor which severely impacts this demographic is the lack of childcare. Through conversations with service providers, many of their clients struggle to find available childcare which impacts their clients ability to maintain stable work and ultimately stable housing.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

- **House of Hope TBRA** – Current capacity 32 households with children. No maximum capacity.
- **NEWCAP TBRA** – They do not have maximum capacity for TBRA program, they serve as many households as possible. TBRA funding is used to pay the rental assistance portion of EHH RRH/Prevention Services
- **NEWCAP CABA Emergency Shelter**- 16 beds, 8 units
- **Housing Choice Voucher/ICS** – 2799 households have vouchers and are getting assistance payments. 764 approved applicants on the waiting list waiting for vouchers.
- **The Bridge at Freedom House (TLP)**: Current capacity 5 household's w/ children
- **EPH**: 13 long-term supportive unites for families, 20 transitional units available
- **RE Management**: 120 Unit Badger Terrace Apartments, 80-unit Woodland Park Apartments; 70-unit Trail Creek Apartments all serving seniors and persons with disabilities; 84 units of Section 8 Family Housing at Line Tree Terrace and Parkview Terrace Apartments (taken from RE Management's website)
- **Housing Authority Scattered Sites**: 152 Households housed at Mason Manor; 48 families housed in scattered site program. Mason Manor currently has a wait list and they have 39 applications. 77 current applications on Scattered Sites Waiting List. (info from GB Housing Authority Director Jayme Valentine)
- **New Community Shelter**: 50 beds.

- **Safe Shelter:** 13 family units that can accommodate up to 60 individuals.
- **St. Johns Homeless Shelter-** A shelter of last resort for adult singles. Provides services and overnight shelter for approximately 120 people per night during the months of November 1st-April 30th.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Gaps within the current shelter inventory:

- Based on conversations at Brown County Homeless & Housing Coalition we need low-barrier shelters for clients with AODA needs, Severe Mental Health Illnesses (those unable to care for themselves or that may be a threat to others in shelter situations, individuals with disabilities that severely limit one or more functional capacities); Shelters for larger family sizes.
- Couples Shelter
- Shelter for persons who have committed sex offenses in the past and are registered as such.

Gaps within the current housing program inventory:

- Rentals that are “affordable”; three bedroom and larger units, handicap-accessible units, one-bedroom units; two-bedroom units.
- More Transitional Living Program units
- Permanent supportive housing for singles and families
- Housing specific for people with disabilities

Gaps within the service delivery system:

- Access to services- not all housing programs use coordinated entry, many have high barriers to access
- Waiting lists are long- Clients are often not reachable when shelter/housing becomes available.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

Not applicable.

Identify priority needs for qualifying populations:

QP1. Homeless

Based on consultation with service providers and area shelters, priority needs for the Homeless Population are:

- Increase in affordable and accessible housing
- Increase in qualified professionals and organizations to provide AODA and mental health services
- Additional transitional housing units and supportive housing units

QP2. At Risk of Homelessness

Based on consultation with service providers and area shelters, priority needs for the At Risk of Homeless Population are:

- Additional resources for mental health and AODA services.
- Additional creation of affordable housing units
- Additional childcare services

QP3. Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking.

Based on consultation with service providers and area shelters, priority needs for Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking population are:

- Additional resources for mental health and AODA services.
- Additional creation of affordable housing units
- Creation of supportive housing units
- Additional childcare services

QP4. Other Populations

Based on consultation with service providers and area shelters, priority needs for the Other Population are:

- Additional resources for mental health and AODA services.
- Additional creation of affordable housing units
- Additional childcare services

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

The level of need and gaps have been determined through consultation with local service providers, local area data, reports, and studies.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The PJ will follow all procurement standards and procedures as defined by the City of Green Bay's Purchasing Department. Applicants for the HOME-ARP funds will be solicited through the City of Green Bay's Purchasing Department by the use of a request for proposals. Any direct subsidy for the creation of affordable housing to developers will be awarded by the City of Green Bay's Redevelopment Authority through an application process and administered by City of Green Bay Staff.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not applicable.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 753,395.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,000,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 194,821.00	10 %	15%
Total HOME ARP Allocation	\$ 1,948,216.00		

Additional narrative, if applicable:

Not applicable.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The City of Green Bay is currently facing a housing shortage. This is shown in the attached data and it is validated by nearly every service provider and agency we have spoken to. Service providers are having a challenging time finding permanent housing for the individuals/familys they serve. Furthermore, there is a gap in supportive housing. There is a high need for housing which includes mental health, job development, and other supportive services. Separate from the need for housing, there are also gaps in our service delivery system for our homeless population who have high mental health needs including and those who struggle with substance abuse. Based on the input received from service providers and the data collected we are allocating the majority of funding to affordable housing development and supportive services.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

10-15 Units

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

It is the PJ's goal to produce rental housing which meet the needs of qualified populations. This includes, but is not limited to, the production supportive housing and accessible rental units priced for individuals earning below 30%AMI.

The City of Green Bay estimates that 10 to 15 units of permanent or transitional rental housing units will be developed with the HOME-ARP funding. The approximate per unit cost will range from \$66,000 to 100,000 depending on the number of units created. Additionally, Green Bay will use a portion of the \$753,395 budgeted for supportive services to assist the tenants of these units. These activities will address the acute need of quality affordable units and supportive services for qualifying population and 0-30% AMI households.

In October 2020, a Housing Market Study was completed for the city of Green Bay by the Green Bay Redevelopment Authority and Green Bay Community and Economic Development staff. One of the things the Housing Study illuminated was the need for more affordable rental units targeting those Green Bay residents at the lowest income.

Compounding this struggle is the reality that there is an undersupply of 3,715 rental units for the lowest income individuals and families in Green Bay, but a significant surplus of rental units at

the 31-50% AMI affordability – keeping affordable rental housing just out of reach for the poorest in Brown County.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

The City of Green Bay does not intend to give preferences.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable, no preference was identified.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Not applicable, no preference was identified.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- *Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity*

The City of Green Bay does not intend to use any HOME-ARP funds for refinancing existing debt.

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that*

the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.

Not applicable.

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

Not applicable.

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

Not applicable.

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

Not applicable.

- *Other requirements in the PJ's guidelines, if applicable:*

Not applicable.

For Official Notice:

**Public Hearing
2022 City of Green Bay
Annual Action Plan
Housing and Community Development Programs**

The Redevelopment Authority of the City of Green Bay will hold a public hearing on **Thursday, October 28, 2021**, at 6:00 p.m. The meeting will be conducted at a virtual location. If you wish to participate in the Public Hearing, you may access the meeting by the internet or telephone, using the access code below. If persons attending require special accommodations or translation of this notice, please contact the Community and Economic Development Department at (920) 448-3400.

Join Zoom Meeting

<https://us02web.zoom.us/j/81261236641>

Meeting ID: 812 6123 6641

One tap mobile

+16468769923,,81261236641# US (New York)

Dial by your location

+1 646 876 9923 US (New York)

+1 312 626 6799 US (Chicago)

Meeting ID: 812 6123 6641

Find your local number: <https://us02web.zoom.us/j/81261236641>

The hearing is regarding the following:

Allow interested citizens to participate and provide testimony on housing and other community development needs for the use of Community Development Block Grant (CDBG), HOME Investment Partnership program, and HOME-ARP funds the City will receive for 2022.

Since a primary objective of the CDBG program is to implement projects that benefit low- and moderate-income people, Public Hearing participation by representatives of low- and moderate-income residents is encouraged. Testimony presented at the hearing will be considered in the development of the 2022 Annual Action Plan.

Public comments will be invited at the public hearing or can be sent in writing to:

City of Green Bay

Dept. of Community and Economic Development

Attn: Krista Cisneroz

100 N. Jefferson St., Rm. 608

Green Bay, WI 54301

For additional information, contact Krista Cisneroz at krista.cisneroz@greenbaywi.gov or 920.448.3404.

Publication Date: October 8, 2021

PUBLIC NOTICE

The American Rescue Plan (ARP) provides funding to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME).

The City of Green Bay, Wisconsin has prepared a draft "HOME-ARP Allocation Plan". The public is invited to comment on the plan.

The Action Plan is a document which will guide the use of federal housing funds within the City of Green Bay, to perform activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations.

The draft plan includes funding for the following projects:

<u>HOME-ARP Program</u>	
Supportive Services.....	\$753,395
Development of Affordable Housing.....	\$1,000,000
Administration and Planning.....	\$194,821
TOTAL:	\$1,948,216

The public is invited to comment on the plan to William Peters, Neighborhood Development Specialist, at 920-448-3150, or by email at will.peters@greenbaywi.gov. If persons commenting on the amendment require special accommodations or translation of this notice, please contact the Department of Community and Economic Development at (920) 448-3400.

The comment period will run from February 18, 2022 through March 10, 2022. Written comments received at the Department of Community and Economic Development or by email at will.peters@greenbaywi.gov on or before March 10, 2022, will be considered.

Publication Date: February 18, 2022

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
WI CoC	State CoC	Virtual Meeting	Brown County is #1 in number of people experiencing homelessness and receives the most funding for rapid rehousing. Expressed need for more permanent supportive housing units. Expressed need for case managers experienced in working with individuals with high needs/barriers. Expressed need for a service navigator/housing navigator type position.
Golden House	Shelter for vict	Virtual Meeting	Expressed need for additional affordable housing units. Expressed need for landlords who are willing to rent to people with prior evictions and/or criminal records. Expressed need for housing that can accommodate larger families. Provider stated there is a lack of access to supportive services for individuals who are not in crisis or at "rock bottom". Provider stated more supports are needed for clients after they are housed to help keep them housed.
Freedom House	Family Shelter	Virtual Meeting	Expressed need for units that will accommodate large families(6-8 people), 3-4 bedrooms. Expressed need to address and house those who are currently unsheltered and are either ineligible for shelter or are refusing services. Would like the City to explore tiny house developments. Expressed need for and increase in mental health service providers and funding for mental health services.
NEW Shelter	Shelter	Virtual Meeting	Expressed need for safe, affordable housing and mental health services.
NEWCAP	Shelter/Service	Virtual Meeting	Provide shelter for mentally ill and those unable to provide self-care. Address the shelter needs for individuals who struggle with alcohol and drugs. Expressed need for an increase in a little supportive services.
St. John's Shelter	Shelter of last resort for individuals	In-person meet	Expressed need for more affordable housing units. Expressed concern with the amount of landlords not willing to accept vouchers.
House of Hope	Shelter for you	Virtual Meeting	Expressed need for housing options for high barrier/high need clients. Would like to see improved/increased mental health and AODA services. Would like to see more supportive housing. Agency stated they would like to see more service providers become property owners/managers as a solution to creating more housing options for their clients. Agency suggested providing funding to help agency staff become licensed to provide AODA counseling. Also suggested providing funding to hire licensed social workers and/or counselors.
Safe Shelter	Family Shelter	In-person meet	Explore "Socially Inclusive Housing". Work to address the needs of the unsheltered homeless. Work with landlords to accept section 8 housing vouchers. Address the capacity issues of social workers and case managers. Case managers are so busy trying to balance large case loads that they do not have the time and resources to assist high-need individuals in finding stability.
WI Dept. of Veterans Affairs	Veteran Service	Virtual Meeting	Expressed need for more affordable housing. Expressed need for better transportation to places of employment. Expressed need for more housing that will accept pets/support animals.
Options for Independent Living	Advocates for people with disabilities	Virtual Meeting	Expressed need for more qualified mental health professionals. Expressed need for more affordable housing units that are accessible to people with disabilities. Expressed need for a service navigator position, which currently does not exist. Address the needs of homeless individuals with physical barriers. Increase scattered site affordable housing development.
Brown County Housing Authority	Housing Authority	Virtual Meeting	Expressed need for affordable housing. Also expressed concern over the lack of landlords who are willing to accept housing vouchers.
Green Bay Housing Authority	Housing Authority	Virtual Meeting	Expressed need for assisted, low-income housing units, supportive housing, and childcare.
Brown County Homeless and Housing Coalition	Local Homeless and Housing Coalition	Phone Call	Expressed need for housing options for high barrier/high need clients. Would like to see improved/increased mental health and AODA services. Would like to see more supportive housing. They would like to see more service providers become property owners/managers as a solution to creating more housing options.
Metropolitan Milwaukee Fair Housing Council	Fair Housing & Civil Rights Organization	Phone Call	Amplifying all activities under HOME-ARP, increase presence of Metropolitan Milwaukee Fair Housing, build greater understanding and education around expanding housing choices. Fund testing to investigate illegal housing discrimination. Educating LGBTQ+ on fair housing rights.
Institute for Community Alliances	HMIS Lead Organization	Phone and In-person	Consulted on a regular basis to HMIS information for the Brown County area.

HOUSING GAPS & OPPORTUNITIES

Using both conservative and high growth scenarios to arrive at a range, the City will need the following to meet projected housing demand by 2040:

- **3,314 - 7,441 rental units (140 - 310/year)**

This equates to approximately the following per year, based on current rental pricepoints and HUD FY2020 income categories:

- 75-170 units with monthly rent up to \$1,030
- 50-110 units with monthly rent between \$1,150-\$1,650
- 15-30 units with monthly rent greater than \$1,440

- **4,052 - 9,098 owner-occupied units (170 - 375/year)**

This includes attached and detached units and equates to the following per year, based on current ownership price points and HUD FY2020 income categories:

- 35-75 units priced up to \$158,000
- 35-75 units priced between \$178,000-\$248,000
- 100-225 units priced greater than \$217,000

Figure 33. Rental Unit Mismatch in Green Bay

Source: 2012-2016 CHAS

	Rental Units Available	Renter Households	Over-/Under-Supply
0-30% AMI	2,720	6,435	(3,715)
31-50% AMI	12,745	3,875	8,870
51-80% AMI	3,450	4,735	(1,285)
>80% AMI	290	3,675	(3,385)

Figure 30. Cost Burdened Renters in Green Bay & Surrounding Communities

Source: 2012-2016 CHAS

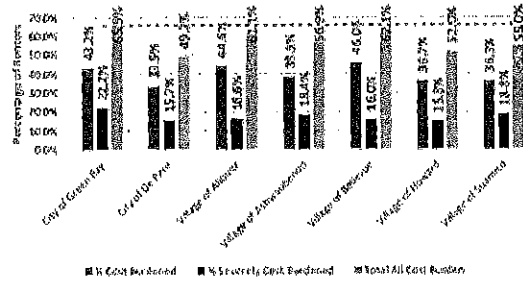


Figure 32. Households by Income & Tenure

Source: 2012-2016 CHAS

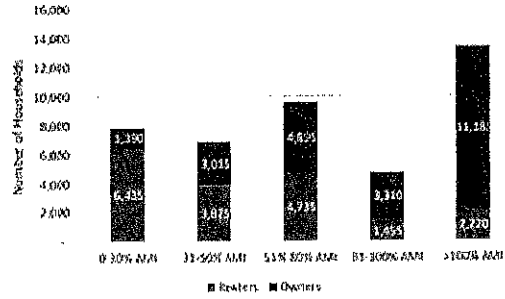


Figure 31. Renter Cost Burden by Household Income

Source: 2012-2016 CHAS

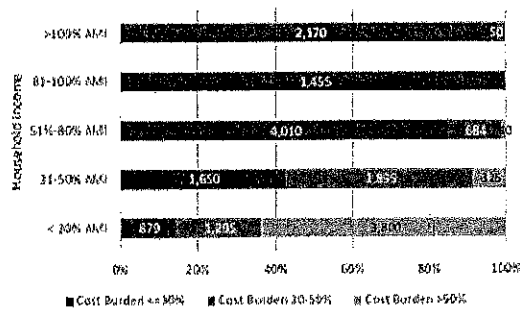


Figure 33. Rental Unit Mismatch in Green Bay

Source: 2012-2016 CHAS

Income Level	Rental Units Available	Renter Households	Over-/Under-Supply
0-30% AMI	2,720	6,435	(3,715)
31-50% AMI	12,745	3,875	8,870
51%-80% AMI	3,450	4,735	(1,285)
>80% AMI	290	3,675	(3,385)

*From 2020 Green Bay Housing Market Study

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
---	---	--

* 3. Date Received: _____	4. Applicant Identifier: _____
-------------------------------------	--

5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____
--	---

State Use Only:

6. Date Received by State: _____	7. State Application Identifier: _____
---	---

8. APPLICANT INFORMATION:

* a. Legal Name: City of Green Bay	
* b. Employer/Taxpayer Identification Number (EIN/TIN): 39-6005458	* c. Organizational DUNS: 0747970280000

d. Address:

* Street1:	100 N. Jefferson Street
Street2:	_____
* City:	Green Bay
County/Parish:	_____
* State:	WI: Wisconsin
Province:	_____
* Country:	USA: UNITED STATES
* Zip / Postal Code:	54301-5026

e. Organizational Unit:

Department Name: Community & Economic Developme	Division Name: _____
---	--------------------------------

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

Prefix: _____	* First Name: William
Middle Name: Joseph	_____
* Last Name: Peters	_____
Suffix: Jr.	_____

Title: Neighborhood Development Specialist

Organizational Affiliation: City of Green Bay Government
--

* Telephone Number: 920-448-3150	Fax Number: 920-448-3426
---	---------------------------------

* Email: will.peters@greenbaywi.gov
--

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:
[Empty field]

Type of Applicant 3: Select Applicant Type:
[Empty field]

* Other (specify):
[Empty field]

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

U.S. Department of Housing and Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:
[Empty field]

*** 12. Funding Opportunity Number:**

14.239

* Title:
HOME-ARP Grant

13. Competition Identification Number:

[Empty field]

Title:
[Empty field]

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

[Empty field] [Add Attachment](#) [Delete Attachment](#) [View Attachment](#)

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

Amendment to 2021 Annual Action Plan for Community Development Block Grant and HOME Program

Attach supporting documents as specified in agency instructions.
[Add Attachments](#) [Delete Attachments](#) [View Attachments](#)

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,948,216.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="1,948,216.00"/>

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

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

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

- Yes
- No

If "Yes", provide explanation and attach

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

** I AGREE

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

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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

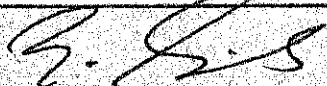
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED, CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Green Bay	03/16/2022

**Applicant Assurances
and Certifications**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2501-0017
(expires 01/31/2016)

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual must provide the following assurances and certifications. By submitting this form, you are stating that to the best of your knowledge and belief, all assertions are true and correct.

As the duly authorized representative of the applicant, I certify that the applicant (insert below the Name and title of the Authorized Representative, name of Organization and the date of signature):

Name: [Signature], Title: Mayor
Organization: City of Green Bay, Date: 3/17/22

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the applicant to act in connection with the application and to provide any additional information as may be required.
2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR Part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).
3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR Part 8, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07), as amended, and implementing regulations at 24 CFR Part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.
4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR Part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR Part 24 and 24 CFR 42, Subpart A.
6. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property acquisition and physical development activities subject to implementing regulations at 24 CFR parts 50 or 58.
7. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-L.L.L. Disclosure Form to Report Lobbying. I certify that I shall require all sub awards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

These certifications and assurances are material representations of the fact upon which HUD can rely when awarding a grant. If it is later determined that I the applicant, knowingly made an erroneous certification or assurance, I may be subject to criminal prosecution. HUD may also terminate the grant and take other available remedies.

HOME-ARP CERTIFICATIONS

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

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

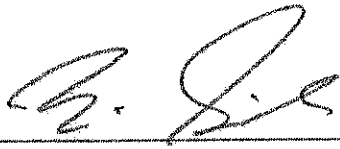
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

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

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

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

3/17/22
Date

Mayor

Title